

Language Assistance Plan

Revised February 2016

I. Introduction

This Language Assistance Plan is one component of the City of Santa Rosa Transit Division's efforts to provide an appropriate mix of language assistance measures to meet the needs of individuals within the Santa Rosa CityBus service area who are "limited English proficient." Limited English proficient (LEP) individuals are those who have limited ability to read, write, speak, or understand English. The plan includes demographic analysis, a survey of Santa Rosa CityBus and Santa Rosa Paratransit staff, input from staff of community organizations serving LEP individuals, and feedback from LEP individuals themselves. Also included is a summary of language assistance measures currently provided by the Santa Rosa Transit Division, and additional measures proposed for the future.

II. Background

Title VI of the Civil Rights Act of 1964 provides that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives federal financial assistance. Title VI regulations have been interpreted to hold that Title VI prohibits conduct that has a disproportionate effect on LEP persons because such conduct constitutes a form of national origin discrimination. Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency," directs each federal agency to examine the services it provides and implement a system by which LEP persons can meaningfully access those services, and to publish guidance for their respective funding recipients to assist them in meeting their obligations to LEP persons under Title VI.

The City of Santa Rosa's Transit Division has prepared this plan using the "Four-Factor Framework" outlined in the U.S. Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons (DOT LEP Guidance, Federal Register, vol. 70, no. 239, pp. 74087-74100, December 14, 2005). The Transit Division has applied the Four-Factor Framework according to guidance provided in the Federal Transit Administration Office of Civil Rights' *Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers* (April 2007).

The City of Santa Rosa Transit Division is grateful for the support provided by the community organizations that assisted us by participating in interviews, completing surveys, and organizing focus groups of LEP individuals, as well as the individuals who participated in the focus groups.

III. Analysis Using the Four-Factor Framework

Factor 1: The number and proportion of LEP persons served or encountered in the eligible service population.

Task 1, Step 1: Examine prior experiences with LEP individuals.

A survey of Santa Rosa CityBus and Santa Rosa Paratransit staff who interact with the public was administered in late January and early February 2016 to gauge prior experiences with LEP individuals. The number of responses received for each job category is displayed in Table 1.

Table 1: Staff Survey Responses by Job Category

Job Category	Responses
CityBus	
CityBus Operator	47
Field Supervisor	4
Customer Service Staff	3
Transit Service Representative	3
Marketing and Outreach Coordinator	1
Transit Planner	1
Total	59
Santa Rosa Paratransit	
Paratransit Operator	12
Paratransit Customer Service	2
Paratransit Supervisor	1
Total	15

Staff were asked to report how often they interact with limited English proficient individuals in an average week. As shown in Table 2, CityBus operators and Transit Service Representatives (TSR) assisting passengers in the downtown Transit Mall had the highest number of interactions with the LEP individuals in an average week.

Table 2: Number of Staff Interactions with LEP Individuals Each Week

Job Category	Interactions per Week				Responses
	0-5	6-20	20-40	40+	
CityBus					
CityBus Operator	13	9	14	11	47
Field Supervisor	3			1	4
Customer Service Staff	2	1			3
Transit Service Representative			1	2	3
Marketing and Outreach Coordinator	1				1
Transit Planner	1				1
Total	20	10	15	14	59
Santa Rosa Paratransit					
Paratransit Operator	8	1	1	2	12
Paratransit Customer Service	1	1			2
Paratransit Supervisor	1				1
Total	10	2	1	2	15

Staff were also asked to report how successful they were in communicating with LEP individuals (Table 3). Most respondents (67.6%) felt that they are able to effectively communicate “most or all of the time.” 24.3% reported successful communication “some of the time” and 8.1% felt that they were most often unable to communicate effectively with LEP individuals.

Table 3: Staff Ability to Communicate with LEP Individuals

Job Category	Most or all of the time	Some of the time	Not very often	Responses
CityBus				
CityBus Operator	32	12	3	47
Field Supervisor	2	2		4
Customer Service Staff	2	1		3
Transit Service Representative	3			3
Marketing and Outreach Coordinator		1		1
Transit Planner		1		1
Total	39	17	3	59
Percent of Total	66.1%	28.6%	5.4%	

Santa Rosa Paratransit				
Paratransit Operator	8	1	3	12
Paratransit Customer Service	2			2
Paratransit Supervisor	1			1
Total	11	1	3	15
Total - Both Services	50	18	6	74
Percent of Total - Both Services	67.6%	24.3%	8.1%	

According to the staff surveyed, the most common questions asked by limited English proficient individuals are:

- Which bus should I take to [specific location]?
- What time does the bus come?
- How much is the fare?
- How do I make my connection/transfer?

Suggestions offered by CityBus and Santa Rosa Paratransit staff for language assistance measures include:

- Do more to make the social media accessible to LEP individuals
- More information printed in Spanish, including guidelines for riders
- Marketing more on Spanish radio, TV and newspapers

Task 1, Step 2: Become Familiar with data from the U.S. Census.

Task 1, Step 2A: Identify the geographic boundaries of the area your agency serves.

Santa Rosa CityBus' service area is defined by the city limits of Santa Rosa, including the Oakmont senior community in southeastern Santa Rosa. CityBus also serves the unincorporated area of Roseland in the southwest quadrant of the city, as well as other smaller unincorporated "islands" within the Santa Rosa city limits. For this analysis, data have been collected both for the City of Santa Rosa and the Roseland Census-Designated Place (CDP).

Task 1, Step 2B: Obtain Census data on LEP population in your service area.

Data was obtained from the American Community Survey 2009-2014 5-year estimates. These data are presented and analyzed below.

Task 1, Step 2C: Analyze the data you have collected.

Table 4 provides the breakdown of the top fifteen languages spoken in the CityBus service area. The most significant non-English language populations speak Spanish, African languages,
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Chinese and Vietnamese. As discussed further below, a large proportion of Spanish, African languages, Chinese and Vietnamese speakers also speak English “very well”.

Table 4: Top Fifteen Languages Spoken in Santa Rosa, 2014

Language Spoken	Population
English	113,110
Spanish or Spanish Creole	39,466
African Languages	1,273
Chinese	1,250
Vietnamese	1,118
Tagalog	943
Mon-Khmer, Cambodian	921
Other Pacific Island Languages	647
Laotian	620
French (incl. Patois, Cajun)	550
German	521
Other Indic Languages	500
Italian	487
Persian	430
Russian	408

Source: American Community Survey 2009 – 2014, 5-year estimates (Table B16001: Language Spoken at Home by Ability to Speak English for Population 5 Years and Older)

Table 5 displays the number of residents of the Santa Rosa CityBus service area who spoke English “less than very well” in 2014. The total population five years and older in Santa Rosa and the Roseland CDP was 165,005. Of that number, 22,643 (13.7% of the population) spoke English “less than very well”. Over 79% of the residents speaking English “less than very well” were Spanish-speakers (18,076 residents). After Spanish, the languages with the largest number of limited English proficient individuals were Chinese (660) and Vietnamese (647). Less than one-half of all Santa Rosa Spanish, Chinese and Vietnamese-speakers spoke English “less than very well” in 2014.

Table 5: Residents Five Years and Older Speaking English "less than Very Well", 2014

Language Spoken	Estimate
Total:	165,005
Speak only English	113,110
Spanish or Spanish Creole:	39,466
Speak English less than "very well"	18,076
French (incl. Patois, Cajun):	550
Speak English less than "very well"	34
French Creole:	-
Speak English less than "very well"	-
Italian:	487
Speak English less than "very well"	64
Portuguese or Portuguese Creole:	373
Speak English less than "very well"	254
German:	521
Speak English less than "very well"	38
Yiddish:	9
Speak English less than "very well"	-
Other West Germanic languages:	107
Speak English less than "very well"	23
Scandinavian languages:	37
Speak English less than "very well"	0
Greek:	108
Speak English less than "very well"	4
Russian:	408
Speak English less than "very well"	170
Polish:	51
Speak English less than "very well"	43
Serbo-Croatian:	133
Speak English less than "very well"	51
Other Slavic languages:	66
Speak English less than "very well"	15
Armenian:	52
Speak English less than "very well"	0
Persian:	430
Speak English less than "very well"	124
Gujarati:	48
Speak English less than "very well"	24
Hindi:	261
Speak English less than "very well"	89
Urdu:	31
Speak English less than "very well"	19

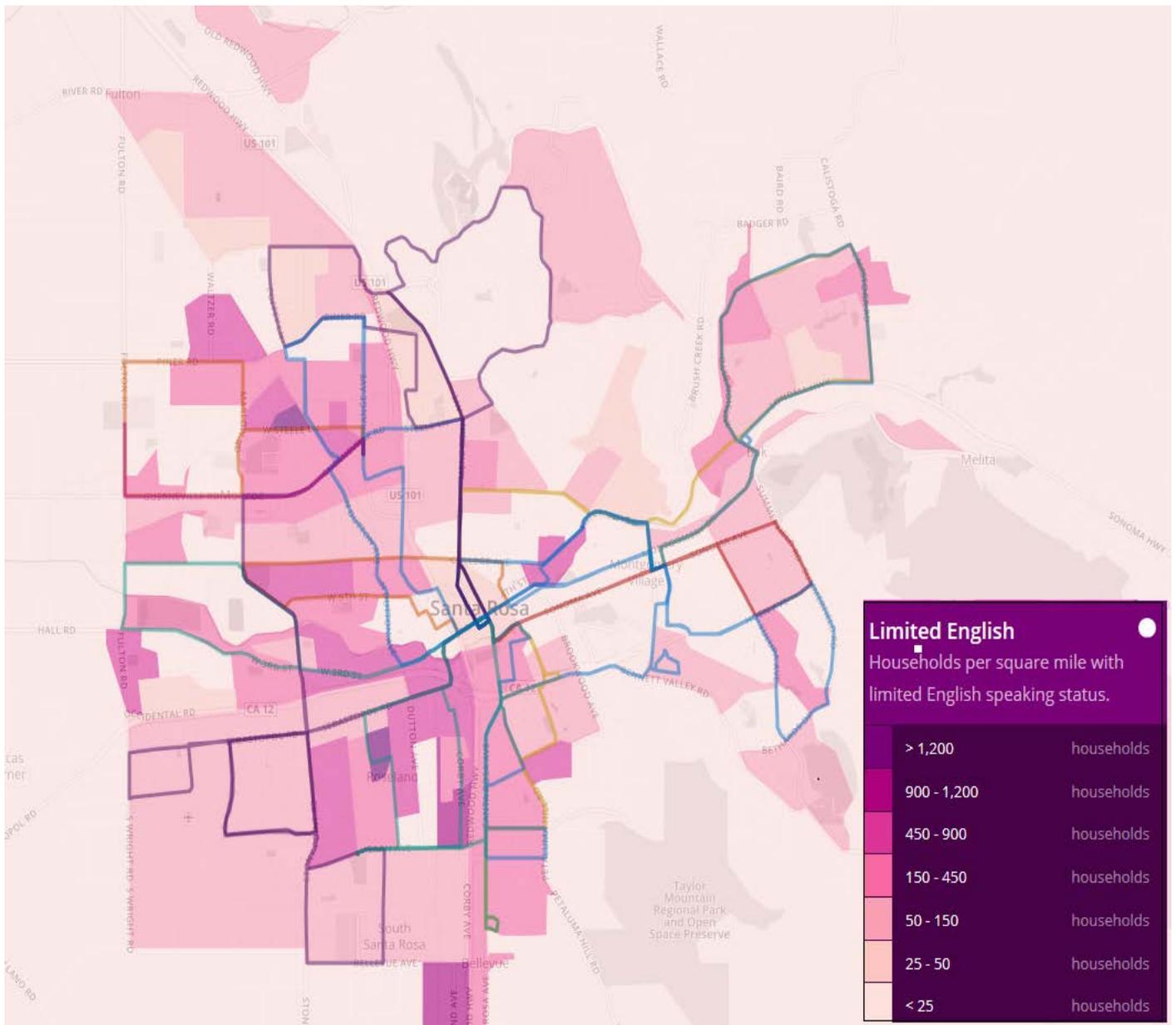
Other Indic languages:	500
Speak English less than "very well"	318
Other Indo-European languages:	120
Speak English less than "very well"	60
Chinese:	1,250
Speak English less than "very well"	660
Japanese:	285
Speak English less than "very well"	72
Korean:	343
Speak English less than "very well"	132
Mon-Khmer, Cambodian:	921
Speak English less than "very well"	499
Hmong:	54
Speak English less than "very well"	54
Thai:	191
Speak English less than "very well"	62
Laotian:	620
Speak English less than "very well"	343
Vietnamese:	1,118
Speak English less than "very well"	647
Other Asian languages:	76
Speak English less than "very well"	36
Tagalog:	943
Speak English less than "very well"	300
Other Pacific Island languages:	647
Speak English less than "very well"	126
Navajo:	-
Speak English less than "very well"	-
Other Native North American languages:	-
Speak English less than "very well"	-
Hungarian:	16
Speak English less than "very well"	-
Arabic:	226
Speak English less than "very well"	72
Hebrew:	96
Speak English less than "very well"	-
African languages:	1,273
Speak English less than "very well"	369
Other and unspecified languages:	78
Speak English less than "very well"	0

Source: American Community Survey 2009 – 2014, 5-year estimates (Table B16001: Language Spoken at Home by Ability to Speak English for Population 5 Years and Older)

Task 1, Step 2D: Identify any concentrations of LEP persons within your service area.

Figure 1 identifies the number of households with limited English speaking status per square mile, by Census block group. The areas with the highest concentrations of household with limited English speaking status are found west of Highway 101, particularly in the Roseland neighborhood of southwestern Santa Rosa, the West Third Street corridor, the West College/West Ninth neighborhood, and the Coddington/West Steele Lane area. There is also a high concentration found south of the incorporated area of the City of Santa Rosa, in the Moorland Avenue neighborhood west of Highway 101.

Figure 1: Areas with High Concentrations of LEP Individuals, Santa Rosa, 2013



Source: American Community Survey 2009-2013

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Task 1, Step 3: Consult state and local sources of data.

Data from the California Department of Education were analyzed to identify the languages spoken by English Learners in Santa Rosa schools. Table 6 presents the number of English Learners in Santa Rosa schools, by language spoken. Of the 9,790 students who were English Learners in 2014-2015, over 93% were Spanish speakers.

Data from the U.S. Department of Labor and the National Center for Education were also reviewed. These data consisted of statistics for Sonoma County as a whole, with no break-out of data at the municipal level. For this reason, these data were not useful for identifying characteristics of the LEP population within the CityBus service area.

Table 6: English Learners in Santa Rosa Schools by Language Spoken, 2014-2015

Language	Number of English Learners
Spanish	9,114
Vietnamese	115
Khmer (Cambodian)	72
French	46
Filipino (Pilipino or Tagalog)	45
Tigrinya	41
Lao	36
Punjabi	32
Mandarin	31
Cantonese	20
Hindi	18
Arabic	15
Samoan	14
Urdu	13
Japanese	12
Russian	11
Korean	8
Korean	8
Gujarati	6
Thai	6
German	5
Portuguese	5
Italian	4
Farsi (Persian)	3
Ilocano	3
Tamil	3
Bengali	3
Pashto	2
Cebuano (Visayan)	2
Hmong	2
Marathi	2
Mien (Yao)	2
Polish	2
Dutch	1
Indonesian	1
Lahu	1
Rumanian	1
Tongan	1
Turkish	1
Ukrainian	1
Burmese	1
All other languages	86

Source: California Department of Education, Demographics Department

Task 1, Step 4: Community organizations that serve LEP persons.

Task 1, Step 4A: Identify community organizations.

Community organizations and social service agencies serving large numbers of LEP individuals were identified using the Santa Rosa Transit Division's database of community organizations and by consulting with City staff, social service agency staff, and community members with knowledge of organizations serving LEP individuals in Santa Rosa.

Task 1, Step 4B: Contact relevant community organizations.

Organizations and agencies to be contacted were prioritized based on their apparent level of involvement with LEP individuals. Staff were contacted and asked to participate in a phone interview or to fill out a short survey. Three community organizations and social service agencies completed the surveys; Roseland English Adult Learners, Catholic Charities of Santa Rosa and Goodwill Industries.

Task 1, Step 4C: Obtain information.

During interviews with staff of community organizations and social service agencies, information was collected on the size of the population served, the transportation needs of the client population, demographic trends among the population, and effective ways to obtain input from the population.

Client Population Characteristics

The organizations surveyed were quite diverse, with client populations ranging between 120 and 7,000 per year. Some reported serving the entire Sonoma County area, others reported serving surrounding counties as well. For this reason, information regarding transit and transportation needs was not limited to CityBus services within Santa Rosa.

All stated that the LEP individuals they serve are immigrants from Latin American countries, with the largest proportion immigrating from Mexico.

Transportation Needs or Issues

All agency staff stated that their clients ride the bus; with commonly cited destinations including work, school or college, citizenship or ESL classes, grocery shopping, and medical appointments. Staff reported that clients can have difficulty using the bus because of the length of trips and the limited frequency.

Effective Ways to Communicate with Client Population

According to the staff interviewed, LEP individuals would prefer "clearly" written brochures in their native language. A few respondents noted that one-on-one communication between

organization/agency staff and LEP individuals was often the best way to provide information. Other effective means of communication cited by respondents to previous interviews of community organization staff include Spanish-language radio and peer networks. Community organization staff have noted that many undocumented individuals have a distrust of government and fear of deportation which limits their involvement in meetings or willingness to voice needs or complaints directly.

Factor 2: The frequency with which LEP individuals come into contact with your programs, activities, and services.

Task 2, Step 1: Review the relevant programs, activities, and services you provide.

As identified in Task 1, LEP individuals inquire about, use, and are affected by the services Santa Rosa CityBus provides on a daily basis. Operational services include fixed route service and ADA Paratransit. LEP persons also make use of information provided by CityBus customer service staff, Transit Service Representatives, bus operators, field supervisors, maps and schedules, and the CityBus website.

Task 2, Step 2: Review information obtained from community organizations.

As discussed in Task 1, Step 4, staff of community organizations and social service agencies reported that many of their clients use transit, including Santa Rosa CityBus and Sonoma County Transit, for much of their travel. However, in general, respondents did not have detailed knowledge of which routes are most heavily used, or the frequency with which transit services are used.

Task 2, Step 3: Consult directly with LEP persons.

Information collected during focus groups with approximately 45 transit riders (60% of which reported that they spoke English “not very well”) conducted in collaboration with community partners during initial development of the CityBus Language Assistance Plan included the following:

- Participants get CityBus information from a wide variety of sources, but the most common responses were that participants get information from bus drivers or from CityBus’ bilingual system maps. Rider alerts/notices, CityBus Transit Service Representatives, and the CityBus website were also cited by several respondents. Several participants indicated that they think CityBus already does a good job of providing information in Spanish.
- Participants’ suggestions for how CityBus information could be provided included making transit information and fare products available at stores that are popular with Spanish speakers, such as Lola’s Market, Rancho Mendoza, Dollar Tree, and Food Maxx;

more bus stops with bus schedule information and maps (with a “you are here” indicator) for orienting riders; real-time bus arrival information (now available); providing Spanish language training to bus drivers; and via mail and local news, including Spanish-language radio (e.g., KBBF).

- It can be confusing when buses change routes (i.e., when interlined buses change from one route to another at the Transit Mall)—providing information to indicate how buses are interlined would be helpful.
- Public information indicating which routes to take to popular stores would be helpful.

Transit Division staff plan additional consultation with LEP individuals in early 2016 as part of its “Reimagining CityBus” project. The Language Assistance Plan will be updated with any new information collected as part of that consultation.

Factor 3: The importance to LEP persons of your program, activities, and services.

Task 3, Step 1: Identify your agency’s most critical services.

Critical services are defined by the DOT guidance as programs or activities that would have serious consequences for individuals if language barriers prevent a person from benefiting from the activity. Serious consequences could include the inability of an LEP individual to effectively utilize public transportation to obtain health care, education, or access to employment. Critical services provided by the Transit Division include:

- CityBus route and schedule information
- Fare media information
- System rules, particularly transfer rules
- Information on how to ride the system
- Rider Alerts
- Safety and security announcements
- Communication related to transit planning and service changes
- Information on ADA Paratransit services
- Non-discrimination (Title VI) policy

Task 3, Step 2: Review input from community organizations and LEP persons.

The Transit Division’s communication with community organizations and LEP persons clearly identified the importance of fixed-route transit services to LEP individuals, as well as the importance of the range of language assistance in Spanish already provided by the Transit Division.

Factor 4: The resources available to the recipient and costs.

Task 4, Step 1: Inventory language assistance measures currently being provided, along with associated costs.

Santa Rosa CityBus provides the following language assistance measures to date:

- Phone translations are provided through an AT&T calling service for any individual.
- Use of pictograms or additional translation related to required actions/behavior onboard vehicles
- A number of CityBus staff, including bus operators, a Transit Service Representative, and administrative/customer service staff are proficient in Spanish.
- Route information that can be accessed through the automated phone system is recorded in both English and Spanish.
- System maps and schedules have all fare, holiday, contact, and trip planning information in both English and Spanish.
- Customer information brochures (e.g., Learn to Ride CityBus, Fare Policy) and Rider Alerts are printed in both English and Spanish.
- Paratransit Rider Guide is available in both English and Spanish.
- Information on promotional events is printed in English and Spanish.
- Car cards that include fare information and the Title VI non-discrimination policy are printed in English and Spanish and displayed continuously inside buses.
- Stickers displaying fare information on buses are provided in both English and Spanish
- Information about filing a Title VI complaint is provided in both English and Spanish.
- Public notices of meetings and service changes are printed in both English and Spanish.
- Important, time-sensitive information, including Public Service Announcements, are announced/advertised on local Spanish-language radio stations and published in *La Voz* newspaper.
- Interpretation is provided for Spanish-speakers at public meetings and workshops.
- All information on the City's website (www.srcity.org), including transit and paratransit information, can be translated into numerous languages by clicking on the desired language at the bottom of the web screen.

CityBus has an annual budget of roughly \$75,000 dollars for marketing and outreach. Any marketing and outreach information translated into Spanish is included in this budget.

Task 4, Step 2: Determine what, if any, additional services are needed.

Based on the most recent Census data for the Santa Rosa CityBus service area, by far the largest LEP population in our service area is Spanish-speaking. The next largest groups are the Chinese and Vietnamese-speaking LEP populations, which are of a size that place them below but near

the “Safe Harbor” threshold of 5% of the service area population or 1,000 individuals, whichever is less. Given the findings of this analysis, it does not appear that translation of printed information into Chinese or Vietnamese is warranted at this time, given constraints on the operating budget and other language assistance priorities. However, Transit Division staff will continue to evaluate the need to translate additional printed materials into languages other than Spanish in coordination with community partners.

The following is a list of language assistance measures the Transit Division plans to investigate or implement based on this outreach and analysis:

- Training for staff in the basics of communicating with Spanish-speakers
- Provision of information on schedules indicating interlines
- Additional “guide-a-ride” style bus schedule information at key bus stops
- A listing of popular destinations and bus routes that serve those destinations to aid with trip planning
- Posting or distribution of targeted transit information at stores that are popular with Spanish speakers
- Translation of additional paratransit paperwork
- Further education of the public as well as staff of community organizations and social services agencies about availability of language assistance.

Task 4, Step 3: Analyze your budget.

The Transit Division budget is constrained at this time given reduced funding from several sources of operating funds. However, there is capacity within the Division’s marketing budget to provide translation of materials into Spanish on an ongoing basis, in keeping with the current practice. We believe that many of the language assistance measures identified in Task 4, Step 3 can also be implemented within the existing budget. Grants can be pursued for any measures that cannot be implemented within the existing budget.

Task 4, Step 4: Consider cost-effective practices for providing language services.

Cost-effective practices for providing language services that the Transit Division has pursued or may pursue include:

- Add larger translation “button” on Transit division webpages to make it easier for pages to be translated
- Partnering with community organizations to assist with translation or interpretation
- Partnering with community organizations to assist with distribution of printed information to LEP individuals, or to provide educational or outreach opportunities to LEP individuals.

We also believe that the measures identified in Task 4, Step 2, are highly cost-effective measures for improving the access of LEP individuals to Santa Rosa CityBus and Santa Rosa Paratransit services.

IV. Providing Notice to LEP Persons Regarding the Availability of Language Assistance

CityBus will create and post a notice informing riders and other members of the public of the availability of free language assistance and how to access it. The notice will be provided in English and Spanish and posted at the following locations:

- Inside buses (car cards)
- Transit Division offices at City Hall and the Transit Operations Building
- Downtown Transit Mall
- Major transfer hubs
- CityBus website

The notice will be provided to all Transit Division and staff, as well as staff of the paratransit contractor. The notice will also be distributed during community outreach activities and forwarded to community partners who work with LEP individuals.

As part of monitoring this Language Assistance Plan, the Transit Division will periodically review whether this notice should be provided in additional languages.

V. Staff Training

The Transit Division will deliver an annual training for front line staff that will include:

- A summary of the Transit Division's responsibilities under the DOT LEP Guidance,
- A summary of the Language Assistance Plan,
- A description of the type of language assistance offered by the Transit Division and instructions for accessing these services, and
- Strategies for working effectively with Limited English Proficient individuals and Spanish-speaking LEP individuals in particular.

Front line staff include:

- | | |
|--------------------------------------|--------------------------------------|
| - Bus operators | - Paratransit Supervisors |
| - Field Supervisors | - Transit Superintendent |
| - Customer Service Staff | - Transit Planners |
| - Transit Service Representatives | - Paratransit Operators |
| - Marketing and Outreach Coordinator | - Paratransit Customer Service Staff |

In developing the training, the Transit Division may make use of the training resources identified in the DOT LEP Guidance. Training for paratransit front line staff and paratransit eligibility evaluations will be delivered in coordination with the paratransit contractor and eligibility process contractor.

VI. Monitoring, Updating, and Evaluating the Language Assistance Plan

At a minimum, the Language Assistance Plan will be evaluated and updated every three years to coincide with submittal of the CityBus Title VI Program to the Federal Transit Administration. In the interim, monitoring activities may identify changes that should be made to the Language Assistance Plan. Monitoring activities will include evaluation of the following information:

- Needs identified by front line staff during employee training activities related to Limited English Proficiency or in the course of day-to-day operations of the system;
- Needs identified by community partners or LEP individuals during outreach activities or other engagement with Transit Division staff; and
- New data related to LEP populations in the CityBus service area.

If evaluation of new information received during monitoring of the plan leads to substantive changes in language assistance policies or practices, the Language Assistance Plan will be updated accordingly.