

APPENDIX B – SACOG LEP Plan



S A C O G

SACOG Plan for Special Language Services to Limited English Proficient (LEP) Populations

Presidential Executive Order 13166 requires federal agencies to implement measures to ensure that people who speak limited English have meaningful access to programs and activities that are conducted and/or funded by the federal government, consistent with Title VI of the Civil Rights Act of 1964. Both the U.S. Department of Transportation (US DOT) and Federal Transit Administration (FTA) have implemented guidance or directives in furtherance of Executive Order 13166.

In compliance with guidance and rules issued by US DOT, and Title VI of the Civil Rights Act of 1964, SACOG continues to take reasonable steps to ensure that all persons have meaningful access to its programs, services, and information, at no additional cost. This document is SACOG's Plan for Special Language Services to Limited English Proficient (LEP) Populations, referred to as the LEP Plan. In order to prepare this LEP Plan, SACOG undertook the US DOT's four-factor LEP analysis, which considers the following:

1. The number and proportion of LEP persons served or encountered in the eligible service population.
2. The frequency with which LEP persons come in contact with SACOG programs, activities or services.
3. The importance to LEP Persons of SACOG's program, activities and services.
4. The resources available to SACOG and overall cost to provide LEP assistance.

SACOG is the metropolitan planning organization (MPO) for the Sacramento region. SACOG's service area includes six counties and 22 cities, with a population of 2.3 million in a range of urban, suburban, and rural settings. The population is increasingly diverse, with a portion speaking a language other than English.

In addition to this LEP Plan, a separate but related document, SACOG's Public Participation Plan, also lays out ways in which SACOG seeks broad public participation in SACOG's work and the transportation planning process. SACOG's current Public Participation Plan is included as Appendix A.

Part 1. Determination of Need

Factor 1: Number and proportion of LEP persons served or encountered

The following tables, drawn from American Community Survey (ACS) data for 2005-2009, identify those who speak English "less than very well" as Limited English Proficient persons.

Table 1 shows, by county, the ability to speak English and languages spoken at home for persons five years of age and older. The six most frequently spoken languages in the region other than English are Spanish (12.7 percent), Chinese (1.8 percent), Russian (1.2 percent), Tagalog (1.6 percent), Vietnamese (1.1 percent) and Hmong (1.1 percent). However, many of these people also speak English very well. Table 2 shows that Spanish-speakers are the only population representing more than 5 percent of any individual county's population, or of the region's population, that is identified as not speaking English very well.

Table 1 - Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over

	El Dorado	Placer County, California	Sacramento County, California	Sutter County, California	Yolo County, California	Yuba County, California	Region	Excluding MOE	
	Estimate	Estimate	Estimate	Estimate	Estimate	Estimate	Estimate	Percent of total	Margin of Error
Total:	169,191	315,818	1,294,651	86,278	183,950	64,903	2,114,791	100.0%	195
Speak only English	149,234	272,023	903,542	56,495	120,987	48,277	1,550,558	73.3%	5539
Speak Other than English	19,957	43,795	391,109	29,783	62,963	16,626	564,233	26.7%	unk
Spanish or Spanish Creole:	12,396	19,798	170,997	17,711	37,206	11,521	269,629	12.7%	3722
Speak English "very well"	6,888	11,297	93,246	7,068	19,745	5,560	143,804	6.8%	3028
Speak English less than "very well"	5,508	8,501	77,751	10,643	17,461	5,961	125,825	5.9%	3405
French (incl. Patois, Cajun):	387	1,284	3,748	145	832	98	6,494	0.31%	720
Speak English "very well"	332	1,124	3,085	122	752	74	5,489	0.26%	638
Speak English less than "very well"	55	160	663	23	80	24	1,005	0.05%	268
French Creole:	0	33	120	6	0	0	159	0.008%	245
Speak English "very well"	0	33	80	6	0	0	119	0.006%	243
Speak English less than "very well"	0	0	40	0	0	0	40	0.002%	39
Italian:	292	944	2,155	66	188	220	3,865	0.18%	492
Speak English "very well"	243	790	1,689	66	135	166	3,089	0.15%	425
Speak English less than "very well"	49	154	466	0	53	54	776	0.04%	229
Portuguese or Portuguese Creole:	145	357	2,027	181	247	75	3,032	0.14%	471
Speak English "very well"	116	196	1,583	118	184	23	2,220	0.10%	387
Speak English less than "very well"	29	161	444	63	63	52	812	0.04%	209
German:	1,098	1,231	4,377	314	939	246	8,205	0.39%	731
Speak English "very well"	933	1,087	3,721	300	873	175	7,089	0.34%	682
Speak English less than "very well"	165	144	656	14	66	71	1,116	0.05%	233
Yiddish:	0	16	75	0	17	0	108	0.005%	116
Speak English "very well"	0	16	75	0	0	0	91	0.004%	63
Speak English less than "very well"	0	0	0	0	17	0	17	0.001%	26
Other West Germanic languages:	76	346	849	48	161	17	1,497	0.07%	375

Speak English "very well"	76	242	765	48	161	17	1,309	0.06%	359
Speak English less than "very well"	0	104	84	0	0	0	188	0.009%	114
Scandinavian languages:	80	286	464	7	105	46	988	0.05%	211
Speak English "very well"	80	275	424	7	90	46	922	0.04%	208
Speak English less than "very well"	0	11	40	0	15	0	66	0.003%	47
Greek:	27	259	786	24	211	18	1,325	0.06%	291
Speak English "very well"	21	218	522	19	201	10	991	0.05%	252
Speak English less than "very well"	6	41	264	5	10	8	334	0.02%	126
Russian:	268	1,562	20,167	7	2,951	46	25,001	1.2%	2145
Speak English "very well"	208	953	8,724	5	1,092	30	11,012	0.52%	1319
Speak English less than "very well"	60	609	11,443	2	1,859	16	13,989	0.66%	1211
Polish:	149	53	628	14	65	18	927	0.04%	262
Speak English "very well"	118	53	508	14	52	18	763	0.04%	226
Speak English less than "very well"	31	0	120	0	13	0	164	0.008%	89
Serbo-Croatian:	66	165	1,524	13	107	42	1,917	0.09%	550
Speak English "very well"	34	63	932	10	95	34	1,168	0.06%	358
Speak English less than "very well"	32	102	592	3	12	8	749	0.04%	265
Other Slavic languages:	265	1,127	10,655	108	258	70	12,483	0.59%	1750
Speak English "very well"	224	615	3,690	62	128	36	4,755	0.22%	851
Speak English less than "very well"	41	512	6,965	46	130	34	7,728	0.37%	1107
Armenian:	69	103	1,187	158	105	0	1,622	0.08%	505
Speak English "very well"	69	75	577	64	8	0	793	0.04%	297
Speak English less than "very well"	0	28	610	94	97	0	829	0.04%	328
Persian:	560	1,314	4,637	12	769	60	7,352	0.35%	993
Speak English "very well"	465	850	2,967	12	462	28	4,784	0.23%	758
Speak English less than "very well"	95	464	1,670	0	307	32	2,568	0.12%	436
Gujarati:	86	87	1,432	0	237	0	1,842	0.09%	553
Speak English "very well"	86	55	966	0	152	0	1,259	0.06%	416
Speak English less than "very well"	0	32	466	0	85	0	583	0.03%	241
Hindi:	253	1,002	11,627	493	717	100	14,192	0.67%	1339
Speak English "very well"	225	765	8,495	254	484	57	10,280	0.49%	1084
Speak English less than "very well"	28	237	3,132	239	233	43	3,912	0.18%	522

Urdu:	0	169	1,686	55	740	0	2,650	0.13%	713
Speak English "very well"	0	157	1,074	19	303	0	1,553	0.07%	458
Speak English less than "very well"	0	12	612	36	437	0	1,097	0.05%	351
Other Indic languages:	239	1,276	12,368	8,075	1,939	157	24,054	1.14%	1901
Speak English "very well"	229	960	7,264	2,526	1,370	111	12,460	0.59%	1311
Speak English less than "very well"	10	316	5,104	5,549	569	46	11,594	0.55%	1171
Other Indo-European languages:	62	826	4,099	26	382	410	5,805	0.27%	1016
Speak English "very well"	42	541	1,958	26	242	356	3,165	0.15%	665
Speak English less than "very well"	20	285	2,141	0	140	54	2,640	0.12%	646
Chinese:	924	2,162	28,986	390	6,149	219	38,830	1.8%	2137
Speak English "very well"	655	1,103	12,641	233	3,386	109	18,127	0.86%	1269
Speak English less than "very well"	269	1,059	16,345	157	2,763	110	20,703	0.98%	1340
Japanese:	208	630	3,932	160	564	132	5,626	0.27%	647
Speak English "very well"	110	288	2,307	94	290	86	3,175	0.15%	484
Speak English less than "very well"	98	342	1,625	66	274	46	2,451	0.12%	342
Korean:	419	871	5,297	467	1,351	95	8,500	0.40%	1192
Speak English "very well"	216	528	2,448	215	779	58	4,244	0.20%	707
Speak English less than "very well"	203	343	2,849	252	572	37	4,256	0.20%	731
Mon-Khmer, Cambodian:	82	118	2,069	120	216	174	2,779	0.13%	682
Speak English "very well"	43	29	1,284	79	162	126	1,723	0.08%	480
Speak English less than "very well"	39	89	785	41	54	48	1,056	0.05%	339
Hmong:	30	383	20,075	96	731	2,001	23,316	1.1%	2256
Speak English "very well"	30	176	9,691	70	594	612	11,173	0.53%	1407
Speak English less than "very well"	0	207	10,384	26	137	1,389	12,143	0.57%	1400
Thai:	53	172	1,686	122	115	12	2,160	0.10%	553
Speak English "very well"	24	94	843	60	92	0	1,113	0.05%	355
Speak English less than "very well"	29	78	843	62	23	12	1,047	0.05%	339
Laotian:	0	27	3,271	0	164	0	3,462	0.16%	797
Speak English "very well"	0	27	1,567	0	67	0	1,661	0.08%	462
Speak English less than "very well"	0	0	1,704	0	97	0	1,801	0.09%	465
Vietnamese:	49	786	19,900	245	1,629	174	22,783	1.1%	1782
Speak English "very well"	6	442	8,491	90	1,122	108	10,259	0.49%	1160

Speak English less than "very well"	43	344	11,409	155	507	66	12,524	0.59%	1087
Other Asian languages:	195	991	9,811	0	521	10	11,528	0.55%	1291
Speak English "very well"	163	701	5,543	0	359	0	6,766	0.32%	860
Speak English less than "very well"	32	290	4,268	0	162	10	4,762	0.23%	810
Tagalog:	743	3,953	25,725	396	1,515	491	32,823	1.6%	2224
Speak English "very well"	519	2,796	17,270	273	1,077	352	22,287	1.1%	1619
Speak English less than "very well"	224	1,157	8,455	123	438	139	10,536	0.50%	1201
Other Pacific Island languages:	65	525	5,850	173	338	61	7,012	0.33%	1023
Speak English "very well"	52	396	3,790	144	272	37	4,691	0.22%	797
Speak English less than "very well"	13	129	2,060	29	66	24	2,321	0.11%	446
Navajo:	0	0	82	10	0	3	95	0.004%	66
Speak English "very well"	0	0	75	0	0	3	78	0.004%	60
Speak English less than "very well"	0	0	7	10	0	0	17	0.001%	21
Other Native North American languages:	45	28	217	30	112	13	445	0.02%	157
Speak English "very well"	45	28	166	30	47	6	322	0.02%	122
Speak English less than "very well"	0	0	51	0	65	7	123	0.006%	89
Hungarian:	221	40	422	0	16	48	747	0.04%	265
Speak English "very well"	151	40	330	0	16	39	576	0.03%	239
Speak English less than "very well"	70	0	92	0	0	9	171	0.008%	110
Arabic:	181	638	3,980	82	207	0	5,088	0.24%	897
Speak English "very well"	119	350	3,211	16	147	0	3,843	0.18%	785
Speak English less than "very well"	62	288	769	66	60	0	1,245	0.06%	341
Hebrew:	186	38	293	0	221	31	769	0.04%	342
Speak English "very well"	178	19	209	0	220	31	657	0.03%	329
Speak English less than "very well"	8	19	84	0	1	0	112	0.005%	76
African languages:	14	80	3,653	21	801	11	4,580	0.22%	815
Speak English "very well"	14	80	2,479	21	629	11	3,234	0.15%	656
Speak English less than "very well"	0	0	1,174	0	172	0	1,346	0.06%	394
Other and unspecified languages:	24	115	252	8	137	7	543	0.03%	160
Speak English "very well"	24	21	200	0	98	7	350	0.02%	134
Speak English less than "very well"	0	94	52	8	39	0	193	0.009%	97

Table 2 – Populations speaking English Less than “Very Well” by County and Regionally

County	Speaks English Less than "Very Well"						Total Speaking English Less than "Very Well"	Speaks English "Very Well"	Speaks Only English	Total
	Spanish	Chinese	Russian	Vietnamese	Hmong	All other languages				
El Dorado	5,508	269	60	43	0	1,339	7,219	12,738	149,234	169,191
	3.3%	0.2%	0.0%	0.0%	0.0%	0.8%	4.3%	7.5%	88.2%	100.0%
Placer	8,501	1,059	609	344	207	5,592	16,312	27,483	272,023	315,818
	2.7%	0.3%	0.2%	0.1%	0.1%	1.8%	5.2%	8.7%	86.1%	100.0%
Sacramento	77,751	16,345	11,443	11,409	10,384	48,887	176,219	214,890	903,542	1,294,651
	6.0%	1.3%	0.9%	0.9%	0.8%	3.8%	13.6%	16.6%	69.8%	100.0%
Sutter	10,643	157	2	155	26	6,729	17,712	12,071	56,495	86,278
	12.3%	0.2%	0.0%	0.2%	0.0%	7.8%	20.5%	14.0%	65.5%	100.0%
Yolo	17,461	2,763	1,859	507	137	4,350	27,077	35,886	120,987	183,950
	9.5%	1.5%	1.0%	0.3%	0.1%	2.4%	14.7%	19.5%	65.8%	100.0%
Yuba	5,961	110	16	66	1,389	758	8,300	8,326	48,277	64,903
	9.2%	0.2%	0.0%	0.1%	2.1%	1.2%	12.8%	12.8%	74.4%	100.0%
Region	125,825	20,703	13,989	12,524	12,143	67,655	252,839	311,394	1,550,558	2,114,791
	5.9%	1.0%	0.7%	0.6%	0.6%	3.2%	12.0%	14.7%	73.3%	100.0%

Factor 2: Frequency of LEP populations' contact with programs, activities, services.

SACOG's experience with LEP populations has been primarily with Spanish speakers. However, SACOG has also made an effort to reach out to speakers of Asian and Eastern European language to gather input for the update of the Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) and in other transit studies and planning work.

Outreach print materials for MTP workshops, unmet transit needs hearings, and environmental justice focus groups have regularly been translated into Spanish. Some meetings have been conducted entirely in Spanish; at other times, simultaneous translation into Spanish has been provided. SACOG has also worked with a community-based organization, Asian Resources, Inc., to provide simultaneous and material translation into Mandarin, Vietnamese, and Russian.

Factor 3: Importance to LEP population of programs, services, activities.

SACOG is not a direct provider of transportation services, but instead every four years creates the MTP/SCS, a 20-year or longer plan for transportation facilities, programs and services across the region. Because of the long-term nature of SACOG's MTP/SCS planning, it has often been difficult to engage LEP populations in providing input.

However, some of SACOG's programs have a more immediate reach, including an agricultural worker vanpool program; annual hearings to identify unmet transit needs in Sacramento, Sutter, Yolo and Yuba counties; the region's 511 traveler information system; and motorist-aid call boxes. These routinely include support for languages other than English.

Factor 4: Resources available to SACOG and overall cost to provide LEP assistance.

SACOG provides publicity in Spanish for unmet transit needs hearings and offers translation into any language upon request to allow LEP populations to participate. SACOG has also offered translation services upon request for community workshops to develop the region's long-range transportation plan. However, there has not been significant demand from LEP residents to participate in these discussions, unless SACOG actively works with community-based organizations to recruit participants from their LEP constituency and provide on-site language support. To the extent possible, SACOG staff also goes out to other organization's meetings or English as a Second Language (ESL) classes involving LEP persons, but unfortunately, the resources for doing this type of outreach are very limited.

SACOG's Community Outreach Specialist speaks fluent Spanish, answers calls from the main telephone line that come in in Spanish, and has an outgoing voicemail message in both English and Spanish. This staff member is also competent in American Sign Language. Several other

staff members also speak Spanish, one staff member speaks Hindi, another speaks Korean, and two other staff members are fluent in Chinese. Several SACOG staff members are proficient enough in Spanish to help translate some written materials, or outside translation services are procured. However, in some cases, the cost to implement multiple language programs, especially to provide translated materials or simultaneous translation, is significant and unfunded.

Part 2. Implementation Plan on Language Assistance

1. Identifying LEP persons who need language assistance

As noted above, the most significant group requiring language assistance has been the Hispanic/Latino population, with 5.9 percent of the region's Spanish-speaking population speaking English less than very well. However, SACOG has also sought to identify other groups needing language assistance. Although they represent one percent or less of the region's population, those who speak Hmong, Vietnamese, Russian, and Chinese without speaking English very well still represent, respectively, 12,000 to 20,000 people in the region. SACOG continues to monitor the needs of LEP persons, and to design its communications and public participation efforts to include people regardless of language barriers.

2. Providing language assistance

SACOG has used a number of techniques or practices to provide meaningful opportunities for LEP residents to access transportation-related information and provide input that informs key decisions, including the following:

Transportation Information

- SACOG's 511 website for traffic, transit, rideshare and bicycling information can be accessed in all languages supported by Google translator, including Spanish, Russian, Chinese and Vietnamese.
- By dialing 511, telephone information on transportation services in the Sacramento region is available in Spanish.
- As part of a study of transit needs to reach "lifeline" or essential destinations, SACOG staff interviewed organizations and ESL classes representing LEP populations to identify issues and concerns with public transit services and provide more transportation information.

- SACOG staff has produced and distributed transportation resource sheets to agencies working with low-income and LEP populations in the various counties in the region, including where to find transit information in languages other than English.
- With support from a Caltrans transportation planning grant, SACOG produced and continues to distribute copies of a multi-lingual DVD in Spanish, Cantonese, Vietnamese, Hmong and Russian on using transit, bicycling, walking, and carpooling in the region. The video also has an accompanying information sheet in each language. The video and information sheet is also accessible in all of these languages through the 511 website.
- SACOG helped with the content and translation into Spanish of materials publicizing to labor contractors and potential drivers and riders the availability of reduced cost vanpools for agricultural workers in the Sacramento region.
- SACOG contracts with the company that answers freeway call boxes and insures that translation assistance for any language is available for motorists using call boxes, and through freeway service patrol dispatchers.
- SACOG routinely creates publicity materials for annual Unmet Transit Needs hearings in both English and Spanish. Hearings are held in at least five locations in Sacramento, Yolo, Yuba and Sutter counties, and translation is provided upon request. SACOG also sends press releases to and purchases advertisements in non-English language newspapers publicizing the hearings. Spanish-speakers with comments by phone are directed to a voicemail box with a Spanish greeting, and written or email comments are accepted in any language.
- Most of the region's transit operators already provide transit service information in Spanish. Regional Transit also has an arrangement with a translation service for callers in any language. SACOG also maintains an awareness and sensitivity to LEP needs in developing Short Range Transit Plans for transit agencies in the region, including creating on-board surveys in languages other than English as needed, and developing new transit marketing strategies and recommendations for reaching relevant LEP populations in the transit operator's area.

Regional Transportation Planning

- SACOG provided opportunities for public input at several stages of development of the recently-adopted MTP/SCS. SACOG publicized community workshops through fliers in English and Spanish. Media releases were sent to non-English language media outlets as suggested by participants in SACOG's Public Participation Plan working group, made up of stakeholders representing environmental justice communities. Staff also worked with

community-based organizations that serve LEP populations to support outreach and participation in the workshops. Translation services were offered upon request.

- SACOG also had the opportunity to partner with Asian Resources, Inc. (ARI), a community-based nonprofit providing a wide spectrum of social services to low-income and limited English speaking youth, immigrant and refugee communities in Sacramento, as well as re-entry clients. ARI recruited LEP participants, translated workshop materials into Vietnamese and Russian, and provided-real time language interpretation services for Asian and Eastern European LEP participants at two of the MTP/SCS public workshops.
- Modeled on environmental justice (EJ) focus groups held in 2007 to inform the prior MTP, eight EJ focus groups were held in 2011 to provide input to the recently completed MTP/SCS, with support from Caltrans and the consulting firm MIG. Of the eight, two were targeted to Hispanic/Latino populations and held in Spanish, and one was conducted with Asian/Pacific Islander participants with Vietnamese and Mandarin translation.
- SACOG staff worked with local food banks to promote community workshops by including fliers in Spanish and English in food boxes. Staff also made presentations at social service client meetings.

SACOG plans to continue such measures to insure that those with limited English proficiency can obtain information about transportation services in the region, provide meaningful comment on public transit services, and participate in SACOG's transportation planning work.

3. Training staff

Many of SACOG's staff have experience communicating in an ethnically diverse environment. A number come to the job with multi-lingual skills. Agency training and internal planning will continue to note the need to consider persons with limited English proficiency in communicating transportation information, and providing or partnering for language assistance for LEP persons to support and encourage their participation in the MTP/SCS planning process and other key planning activities. This Plan will be distributed to all agency staff members.

Given the proliferation of smart phones and expansion of internet access, even among low-income populations, SACOG is also exploring the potential to use more online community education and engagement tools that allow people to participate in the planning process without having to physically attend workshops or meetings, and whether those tools can be cost-effectively translated into Spanish or other non-English languages.

4. Providing notice to LEP persons

SACOG will continue to inform the public and LEP persons of their rights under Title VI in a number of ways:

- Notification of Title VI rights on SACOG's website in English, Spanish, and Chinese (the second most prominent non-English language in the region), with Google translator offered on the page for other languages.
- Complaint procedures and forms translated into Spanish and Chinese that are posted on SACOG's website and available through SACOG's offices.
- Routine use of both English and Spanish on printed or electronic announcements for Unmet Transit Needs Hearings and public workshops on key planning efforts that alert interested individuals on how to request translation services.
- Working with community-based organizations and other stakeholders to inform LEP individuals of SACOG's programs and services, including the availability of language assistance services.

5. Monitoring/updating the plan

While maintaining a basic level of access by LEP populations to SACOG transportation information and services, and public input opportunities into key planning decisions, SACOG will monitor demographic shifts and translation requests and adjust practices to meet demand. SACOG's LEP Plan will be updated periodically as needed to reflect significant changes.