

APPENDIX B – SACOG LEP Plan

**SACOG Plan for
Special Language Services to
Limited English Proficient (LEP) Populations
May 2018**

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 2.2 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 D.

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 2011-2015, 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 (12.95 percent), Chinese (1.99 percent), Russian (1.36 percent), Tagalog (1.46 percent), Vietnamese (1.16 percent) and Hmong (1.07 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 County	Placer County	Sacramento County	Sutter County	Yolo County	Yuba County	SACOG Region	Percent
Total:	173716	345965	1366795	88685	195167	67372	2,237,700	100.00%
Speak only English	150968	294071	935666	55719	123868	51112	1,583,660	70.77%
Speak Other than English	22,748	51,894	431,129	32,966	71,299	16,260	654,040	29.23%
Spanish or Spanish Creole:	12805	24264	180867	18678	41634	11536	289,784	12.95%
Speak English "very well"	7811	15898	108849	10529	24369	6836	174,292	7.79%
Speak English less than "very well"	4994	8366	72018	8149	17265	4700	115,492	5.16%
French (incl. Patois, Cajun):	650	1148	2971	108	648	50	5,575	0.25%
Speak English "very well"	534	999	2434	85	608	50	4,710	0.21%
Speak English less than "very well"	116	149	537	23	40	0	865	0.04%
French Creole:	19	29	331	18	0	5	402	0.018%
Speak English "very well"	19	29	278	18	0	0	344	0.015%
Speak English less than "very well"	0	0	53	0	0	5	58	0.003%
Italian:	284	740	1872	49	267	203	3,415	0.153%
Speak English "very well"	262	584	1497	39	252	186	2,820	0.126%
Speak English less than "very well"	22	156	375	10	15	17	595	0.027%
Portuguese or Portuguese Creole:	144	607	2544	123	1032	116	4,566	0.204%
Speak English "very well"	101	392	1753	89	824	14	3,173	0.142%
Speak English less than "very well"	43	215	791	34	208	102	1,393	0.062%
German:	705	1782	3557	222	561	77	6,904	0.309%
Speak English "very well"	630	1532	3071	207	482	59	5,981	0.267%
Speak English less than "very well"	75	250	486	15	79	18	923	0.041%
Yiddish:	0	29	17	0	0	0	46	0.002%
Speak English "very well"	0	18	17	0	0	0	35	0.002%
Speak English less than "very well"	0	11	0	0	0	0	11	0.000%
Other West Germanic languages:	107	285	908	163	127	0	1,590	0.071%
Speak English "very well"	95	257	830	163	127	0	1,472	0.066%
Speak English less than "very well"	12	28	78	0	0	0	118	0.005%
Scandinavian languages:	74	441	435	0	117	41	1,108	0.050%

Speak English "very well"	74	430	425	0	117	41	1,087	0.049%
Speak English less than "very well"	0	11	10	0	0	0	21	0.001%
Greek:	102	193	1486	15	78	35	1,909	0.085%
Speak English "very well"	99	193	1204	9	68	35	1,608	0.072%
Speak English less than "very well"	3	0	282	6	10	0	301	0.013%
Russian:	512	2022	24382	402	3020	61	30,399	1.36%
Speak English "very well"	281	1443	11393	284	1378	37	14,816	0.66%
Speak English less than "very well"	231	579	12989	118	1642	24	15,583	0.70%
Polish:	29	162	504	33	52	22	802	0.036%
Speak English "very well"	29	108	313	26	40	22	538	0.024%
Speak English less than "very well"	0	54	191	7	12	0	264	0.012%
Serbo-Croatian:	0	175	1170	11	133	0	1,489	0.067%
Speak English "very well"	0	128	716	11	118	0	973	0.043%
Speak English less than "very well"	0	47	454	0	15	0	516	0.023%
Other Slavic languages:	109	635	11071	37	637	19	12,508	0.559%
Speak English "very well"	109	466	4887	22	390	4	5,878	0.263%
Speak English less than "very well"	0	169	6184	15	247	15	6,630	0.296%
Armenian:	80	64	3166	0	63	0	3,373	0.151%
Speak English "very well"	72	50	1699	0	17	0	1,838	0.082%
Speak English less than "very well"	8	14	1467	0	46	0	1,535	0.069%
Persian:	1266	1436	6898	342	1386	54	11,382	0.509%
Speak English "very well"	621	1080	4579	189	1120	46	7,635	0.341%
Speak English less than "very well"	645	356	2319	153	266	8	3,747	0.167%
Gujarati:	122	311	1333	5	234	54	2,059	0.092%
Speak English "very well"	122	184	925	5	164	30	1,430	0.064%
Speak English less than "very well"	0	127	408	0	70	24	629	0.028%
Hindi:	830	853	13364	234	1639	33	16,953	0.758%
Speak English "very well"	720	572	9282	135	1314	33	12,056	0.539%
Speak English less than "very well"	110	281	4082	99	325	0	4,897	0.219%
Urdu:	302	102	2960	267	329	6	3,966	0.177%
Speak English "very well"	302	76	2042	163	196	0	2,779	0.124%
Speak English less than "very well"	0	26	918	104	133	6	1,187	0.053%

Other Indic languages:	259	1841	17825	9656	2205	102	31,888	1.43%
Speak English "very well"	242	1183	10009	4638	1107	44	17,223	0.77%
Speak English less than "very well"	17	658	7816	5018	1098	58	14,665	0.66%
Other Indo-European languages:	273	786	5794	40	355	0	7,248	0.324%
Speak English "very well"	244	429	3332	33	120	0	4,158	0.186%
Speak English less than "very well"	29	357	2462	7	235	0	3,090	0.138%
Chinese:	739	2222	32880	382	7601	765	44,589	1.99%
Speak English "very well"	438	1127	11855	232	3852	400	17,904	0.80%
Speak English less than "very well"	301	1095	21025	150	3749	365	26,685	1.19%
Japanese:	176	719	4203	225	463	78	5,864	0.262%
Speak English "very well"	111	420	2460	116	270	56	3,433	0.153%
Speak English less than "very well"	65	299	1743	109	193	22	2,431	0.109%
Korean:	85	1132	5851	91	1506	79	8,744	0.391%
Speak English "very well"	40	378	2674	76	893	35	4,096	0.183%
Speak English less than "very well"	45	754	3177	15	613	44	4,648	0.208%
Mon-Khmer, Cambodian:	42	115	2094	0	321	17	2,589	0.116%
Speak English "very well"	31	45	900	0	202	0	1,178	0.053%
Speak English less than "very well"	11	70	1194	0	119	17	1,411	0.063%
Hmong:	0	266	21341	370	215	1814	24,006	1.07%
Speak English "very well"	0	201	11755	244	126	1037	13,363	0.60%
Speak English less than "very well"	0	65	9586	126	89	777	10,643	0.48%
Thai:	106	206	1148	0	187	124	1,771	0.079%
Speak English "very well"	65	82	517	0	26	111	801	0.036%
Speak English less than "very well"	41	124	631	0	161	13	970	0.043%
Laotian:	37	72	3743	64	393	72	4,381	0.196%
Speak English "very well"	17	66	1689	30	171	53	2,026	0.091%
Speak English less than "very well"	20	6	2054	34	222	19	2,355	0.105%
Vietnamese:	380	1304	22069	259	1733	167	25,912	1.16%
Speak English "very well"	71	621	8936	149	959	72	10,808	0.48%
Speak English less than "very well"	309	683	13133	110	774	95	15,104	0.67%
Other Asian languages:	478	991	12472	45	1326	36	15,348	0.686%
Speak English "very well"	443	711	8249	45	1036	13	10,497	0.469%

Speak English less than "very well"	35	280	4223	0	290	23	4,851	0.217%
Tagalog:	1148	4574	24334	677	1430	432	32,595	1.46%
Speak English "very well"	842	3158	15539	462	943	269	21,213	0.95%
Speak English less than "very well"	306	1416	8795	215	487	163	11,382	0.51%
Other Pacific Island languages:	455	690	6814	166	390	130	8,645	0.386%
Speak English "very well"	344	302	4249	111	286	95	5,387	0.241%
Speak English less than "very well"	111	388	2565	55	104	35	3,258	0.146%
Navajo:	0	0	43	7	16	0	66	0.003%
Speak English "very well"	0	0	36	7	16	0	59	0.003%
Speak English less than "very well"	0	0	7	0	0	0	7	0.000%
Other Native North American languages:	28	66	297	20	56	0	467	0.021%
Speak English "very well"	28	66	288	20	21	0	423	0.019%
Speak English less than "very well"	0	0	9	0	35	0	44	0.002%
Hungarian:	43	179	237	0	31	0	490	0.022%
Speak English "very well"	34	179	143	0	22	0	378	0.017%
Speak English less than "very well"	9	0	94	0	9	0	112	0.005%
Arabic:	93	912	5644	155	401	56	7,261	0.324%
Speak English "very well"	76	608	3390	92	235	34	4,435	0.198%
Speak English less than "very well"	17	304	2254	63	166	22	2,826	0.126%
Hebrew:	163	99	421	0	121	0	804	0.036%
Speak English "very well"	88	86	404	0	116	0	694	0.031%
Speak English less than "very well"	75	13	17	0	5	0	110	0.005%
African languages:	18	176	3740	73	568	46	4,621	0.207%
Speak English "very well"	18	176	2391	73	458	46	3,162	0.141%
Speak English less than "very well"	0	0	1349	0	110	0	1,459	0.065%
Other and unspecified languages:	85	266	343	29	24	30	777	0.035%
Speak English "very well"	85	126	216	29	24	0	480	0.021%
Speak English less than "very well"	0	140	127	0	0	30	297	0.013%

less than very well

Source: 2011-2015 Census American Community Survey (ACS) Table B16001

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"	Total Speaks English "Very Well"	Total Speaks Only English	Total
	Spanish	Chinese	Russian	Vietnamese	Hmong	All other languages				
El Dorado	4,994	301	231	309	0	1,815	7,650	15,098	150,968	173,716
	2.87%	0.17%	0.13%	0.18%	0.00%	1.04%	4.40%	8.69%	86.91%	100.00%
Placer	8,366	1,095	579	683	65	6,703	17,491	34,403	294,071	345,965
	2.42%	0.32%	0.17%	0.20%	0.02%	1.94%	5.06%	9.94%	85.00%	100.00%
Sacramento	72,018	21,025	12,989	13,133	9,586	57,152	185,903	245,226	935,666	1,366,795
	5.27%	1.54%	0.95%	0.96%	0.70%	4.18%	13.60%	17.94%	68.46%	100.00%
Sutter	8,149	150	118	110	126	5,982	14,635	18,331	55,719	88,685
	9.19%	0.17%	0.13%	0.12%	0.14%	6.75%	16.50%	20.67%	62.83%	100.00%
Yolo	17,265	3,749	1,642	774	89	5,313	28,832	42,467	123,868	195,167
	8.85%	1.92%	0.84%	0.40%	0.05%	2.72%	14.77%	21.76%	63.47%	100.00%
Yuba	4,700	265	24	95	777	741	6,602	9,658	51,112	67,372
	6.98%	0.39%	0.04%	0.14%	1.15%	1.10%	9.80%	14.34%	75.87%	100.00%
Region	115,492	26,685	15,583	15,104	10,643	77,706	261,113	365,183	1,611,404	2,237,700
	5.16%	1.19%	0.70%	0.67%	0.48%	3.47%	11.67%	16.32%	72.01%	100.00%

Source: 2011-2015 Census American Community Survey (ACS) Table B16001

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 updates of the Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) and in other transit studies and planning work.

Outreach print materials for unmet transit needs hearings, MTP/SCS workshops, and other key community input meetings 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 translation into Mandarin, Vietnamese, and Russian upon request.

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 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 goes out to other organization's meetings, but unfortunately, the resources for doing this type of intensive outreach are very limited.

SACOG's Public Information & Media Affairs Coordinator 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, two staff members speak Hindi, one speaks

Gujarati, 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 5.16 percent of the region's Spanish-speaking population speaking English less than very well, which is a .3% decrease from the previous five year period. 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, approximately, 10,000 to 27,000 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 automatic browser language preference detection, including Spanish, Russian, Chinese and Vietnamese.
- By dialing 511, telephone information on transportation services in the Sacramento region is available in Spanish.
- 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 multilingual 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 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 call box answering center personnel.
- 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. 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. Sacramento Regional Transit also has an arrangement with a translation service for callers in any language. Transit operators are also increasingly including Google Translator or automatic browser language preference detection on their web pages, to provide translation of their transit information into 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 2016 MTP/SCS, adopted in February 2016, and will continue to do so during the update process of the next MTP/SCS. SACOG has publicized community workshops through outreach materials in English and Spanish. Staff leveraged relationships with community-based organizations that serve LEP populations to support outreach and participation in the workshops. Translation services are always offered upon request.
- All MTP/SCS workshops had Spanish-speaking staff and materials available in Spanish. Additionally, a Spanish online workshop and survey were available and promoted in Spanish through electronic communications and social media.

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.

Given the proliferation of smart phones and expansion of internet access, even among low-income populations, SACOG is continuing to explore opportunities 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 use automatic translation technology or otherwise 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 automatic translation of all pages based on the user's browser language preferences.
- 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.

SACOG is currently working with its website vendor to add information in Spanish on how to translate PDFs of public documents posted into Spanish. Additionally, SACOG will comply with California state law going into effect on January 2019 that requires all public agencies to make all information available on their websites readily translatable in multiple languages.

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.