



ALAMEDA COUNTY TRANSPORTATION COMMISSION

Title VI Language Assistance Plan

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Introduction

The following document serves as the Title VI Language Assistance Plan (LAP) for Limited English Proficient (LEP) Populations for the Alameda County Transportation Commission (Alameda CTC) and demonstrates the agency's commitment to provide meaningful access to all individuals accessing services provided by the agency. The plan is intended for managers and staff who interact directly or indirectly with LEP individuals. Title VI prohibits discrimination by recipients of federal financial assistance on the basis of race, color, and national origin, including the denial of meaningful access for Limited English Proficient people. As a sub-recipient of federal funds, Alameda CTC must "take reasonable steps to ensure meaningful access to their programs and activities by LEP persons."¹

On August 11, 2000, President William Jefferson Clinton signed Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" that requires federal agencies and recipients of federal funds to examine the services they provide, identify any need for services to those with limited English proficiency, and develop and implement a system to provide those needed services so that LEP persons can have meaningful access to them.

As a means of ensuring this access, the Office of Civil Rights has created a handbook² for public transportation agencies that provides step-by-step instructions for conducting the required LEP needs assessment and developing a LAP. The LAP becomes a blueprint for ensuring that language does not present a barrier to access to the agency's programs and activities.

To develop the LAP necessary to comply with the guidance, an individualized agency assessment is required that balances the following four factors:

- Factor 1: The number or proportion of LEP persons eligible to be served or likely to encounter a program, activity, or service of the recipient or grantee;
- Factor 2: The frequency with which LEP individuals come in contact with the program;
- Factor 3: The nature and importance of the program, activity, or service provided by the recipient to people's lives; and
- Factor 4: The resources available to the recipient and costs for language services.

¹ Federal Register Volume 70, Number 239 (Wednesday, December 14, 2005)

² Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers. The Federal Transit Administration Office of Civil Rights, April 13, 2007

To ensure compliance with federal guidance, Alameda CTC undertook an assessment with the goal that all reasonable efforts be made to ensure that stakeholders and members of the public are not denied access to their services due to a limited ability to speak, read, write or understand English. Alameda CTC believes in the rights of all residents within its community, and furthermore supports the overall goal of providing meaningful access to its services to LEP persons. Given the diverse nature of the Alameda County service area, eliminating the barrier to persons with limited English-speaking ability will have a positive impact not only on LEP individuals themselves, but also on the impact that Alameda CTC services have on the community.

Agency Background

Alameda CTC was created in July 2010 by the merger of the Alameda County Congestion Management Agency (ACCOMA) and the Alameda County Transportation Improvement Authority (ACTIA), to streamline operations, eliminate redundancies, and save taxpayer dollars. Alameda CTC prepares the local countywide transportation plan, along with other transportation planning activities in the county, and administers local transportation sales tax Measures B and BB and the Vehicle Registration Fee.

Alameda CTC receives federal funds for a number of programs and activities, including its general administrative operations, plan development of the Alameda Countywide Transportation Plan and Community Based Transportation Plan, Priority Development Area Planning, and the Safe Routes to Schools program and some federal grants, such as for Mobility Management for seniors and people with disabilities.

Alameda CTC also receives funds for the management or oversight of projects in Caltrans' or the local jurisdictions' right of way. However, some of these projects would not be included for Title VI compliance, as Alameda CTC is an "implementing agency" not a "project sponsor." For those activities, Caltrans or the local jurisdictions would be responsible for Title VI compliance.

Alameda CTC uses an open and inclusive public involvement process through public outreach, and project-specific committees made up of local elected officials, public works directors, transit operators, and interested citizens. Alameda CTC continues to be committed to ensuring that access to their services is not limited to English-only speaking populations.

Methodology and Recommendations

The development of the LAP and associated Four Factor Analysis included the following components:

1. Review of relevant programs, activities and services, also existing documents and materials, provided and/or translated by Alameda CTC
2. Data analysis
3. Surveys and Community Based Organization (CBO) participation
4. Alameda CTC staff and consultant interviews
5. General plan findings that include the Four Factor Findings, Top Languages, and Safe Harbor languages

Based on the Four Factor Findings, the following are categories of recommendations that would improve the level of service that Alameda CTC provides to its LEP stakeholders and members of the public and that can be implemented over time as budget and staff permits:

1. General, including such things as internal awareness and public outreach strategy
2. Materials and documents
3. Translation and interpretation tools and protocols
4. Employees, including training or guidance to empower employees to provide assistance.

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1. Four Factor Analysis Overview

The cornerstone of the LAP is the Four Factor Analysis that serves as a needs assessment for developing language assistance measures for those with a limited ability to read, write, speak or understand English. These LEP populations are those who reported to the U.S. Census that they speak English “less than very well,” “not well,” or “not at all.” It’s important to note that LEP status may be context-specific – an individual may have sufficient English language skills to communicate basic information (e.g., name, address, etc.) but may not have sufficient skills to communicate detailed information (e.g., trip planning needs, origin and destination needs) in English.

Federal circulars and resources provide guidance to recipients on how to ensure that they provide meaningful access to persons who are LEP. The guidance notes that recipients shall use the information obtained in the Four Factor Analysis to determine the specific language services that are appropriate to provide. The analysis can help Alameda CTC determine if it communicates effectively with LEP persons and will inform the development of the LAP.

The Four Factor Analysis is an individualized agency assessment that balances the following four factors: 1) determining the number or proportion of LEP persons in the service area who may be served or are likely to encounter an Alameda CTC program, activity or service; 2) the frequency with which LEP populations come in contact with Alameda CTC’s programs, activities and services; 3) the nature and importance of the program, activity, or service provided by the recipient to people’s lives; and 4) the resources available to Alameda CTC and costs associated with language assistance services. This section describes the step-by-step instructions for conducting the required LEP needs assessment according to the federal guidance as it applies to Alameda CTC.

Data Sources and Use

A variety of data sources were consulted for each of the steps in the Four Factor Analysis. This section presents a description of each of the data sources and how they were utilized in the analysis.

Data that were consulted to determine the most prevalent languages spoken in the service area, as well as those that may benefit from language assistance for the Factor 1 analysis included:

- American Community Survey (ACS) 2014-2018 five-year sample languages of people who speak English less than “Very Well” for Alameda County, Table B16001
- ACS 2019 one-year sample of LEP Households, Table S1602
- California Department of Education Language Learner data for Alameda County 2019-2020

The data that were consulted for Factors 2 and 3 (i.e., the frequency with which LEP Populations come in contact with Alameda CTC’s programs, activities and services, and the nature and importance of the program, activity, or service provided by Alameda CTC to people’s lives) included:

- Employee/consultant surveys
- CBO consultation/survey data
- Employee/consultant interviews
- CBO interviews

Data that were consulted for Factor 4 to determine the resources available to Alameda CTC and costs associated with language assistance services included:

- Department budgets for translation and interpretation expenses
- Document translation services costs

Factor 1 Overview

Factor 1 includes determining the number or proportion of LEP persons in the service area who may be served or are likely to encounter an Alameda CTC program, activity or service.

A review of available data sources enabled Alameda CTC to classify the languages spoken in Alameda County into three categories for the purposes of developing the Language Assistance Plan:

- Primary: These represent the languages that are spoken in the heaviest concentration in the county (Spanish and Chinese – Cantonese and Mandarin)
- Secondary: This represents two additional languages with significantly less concentration than Primary (Vietnamese and Tagalog)
- Safe Harbor: This represents the remaining languages in the county that meet the Safe Harbor definition and includes a total of 14 individual or discrete languages

The first step in the LAP development process is to quantify the number of persons in the service area who do not speak English fluently and would benefit from language assistance. This process includes examining the agency's prior experience with LEP populations, and using census and other available data to identify concentrations of LEP persons in the service area, including those that qualify under the "Safe Harbor Languages" definition.

Safe Harbor languages are defined by FTA Circular 4702.1B as languages spoken by at least 1,000 individuals with LEP within the service area, stating, "if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations."

To determine Safe Harbor languages in the Alameda CTC service area, the most recent available ACS data from Alameda County at the time this plan was researched was used. While the data is not as contemporary as desired, it represents the most recent data available at the time this plan was researched that had the granularity necessary to review the specific languages for consideration.

The 2019-2020 California Department of Education Language Learner data also provided corroborating data to support the findings.

1.1 Data Analysis

The first data reviewed related to the percentage of limited English-speaking households within Alameda County in which no member five years or older (1) speaks only English or (2) speaks a non-English language and speaks English "very well." In other words, households in which all members five years old and older have at least some difficulty speaking English. ³ Previous Census Bureau data products have referred to these households as "linguistically isolated."

Using this definition, about 7% of all Alameda County households would be considered LEP households as seen in Table 1: Linguistic Isolation for Households in Alameda County. Of Spanish-speaking households in Alameda County, about 12% are LEP households, or linguistically isolated. The percentage of households who speak Asian and Pacific Island languages and are LEP are about 20% of the total in Alameda County.

While this data presents the broad language categories of those LEP households, it is necessary to review other census data tables to determine the languages of the LEP population. The most current ACS data available at the time this report was undertaken was reviewed for this analysis, which includes Table B16001, which presents the population's ability to speak English.

Table 1: Linguistic Isolation for Households in Alameda County

Alameda County, California			
	Total Households	Limited English-Speaking Households	Percent Limited English-Speaking Households
All Households	585,632	40,116	6.9%
Households Speaking:			
Spanish	86,564	10,209	11.8%
Other Indo-European languages	55,405	3,752	6.8%
Asian and Pacific Island languages	121,592	24,519	20.2%
Other languages	10,222	1,636	16.0%

Source: ACS, 2019 one-year sample Table S1602.

1.2 ACS Safe Harbor Languages

The Safe Harbor language determination began with a review of the 2014-2018 ACS five-year sample data, Table B16001 for Alameda County, presented below in Table 2: Alameda County LEP Population (2014-2018 ACS 5-Year Sample) below. This data is slightly different than the "Linguistic Isolation" table, above, as that data considers only those 5 years of age and older.

³ ACS 2019 one-year sample Table S1602 Table Notes

At 56% of the county's population, the majority of the population in the service area speaks English-only.

Spanish, by a large margin, continues to be the most prevalent LEP language in the service area, at 38% of the LEP population in Alameda County. While Spanish is the most prevalent LEP population, this only accounts for about 7% of the entire population in Alameda County.

The estimated percentage of the population that indicated they speak English less than "Very Well" is about 272,000 or roughly 18% of the total Alameda County population of 1,546,195. When taken together, Spanish and Chinese LEP speakers account for two-thirds of the LEP speakers in the county. LEP speakers of the four most commonly spoken languages (Spanish, Chinese, Tagalog and Vietnamese) account for 79% of all LEP speakers. Table 2: Alameda County LEP Population (2014-2018 ACS 5-Year Sample), below, presents the ACS data breakdown by language for those within the county who speak English less than "Very Well."

Table 2: Alameda County LEP Population (2014-2018 ACS 5-Year Sample)

Alameda County LEP Population				
Languages		ACS LEP Population (Speaks English Less than "Very Well")	Percent of Total County Population	Percent of Total LEP Population
Total Population ACS 2019	1,546,195			
Speak only English	847,080		54.8%	
Spanish		103,510	6.69%	38.09%
Chinese (incl. Mandarin, Cantonese)		78,405	5.07%	28.85%
Tagalog (incl. Filipino)		17,180	1.11%	6.32%
Vietnamese		15,930	1.03%	5.86%
Korean		6,770	0.44%	2.49%
Punjabi		6,450	0.42%	2.37%
Hindi		5,355	0.35%	1.97%
Arabic		3,685	0.24%	1.36%
Other languages of Asia		3,610	0.23%	1.33%
Amharic, Somali, or other Afro-Asiatic languages		3,505	0.23%	1.29%
Persian (incl. Farsi, Dari)		3,435	0.22%	1.26%
Ilocano, Samoan, Hawaiian, or other Austronesian languages		2,685	0.17%	0.99%
Telugu		2,590	0.17%	0.95%
Russian		2,155	0.14%	0.79%
Japanese		2,060	0.13%	0.76%
Tamil		2,040	0.13%	0.75%
Thai, Lao, or other Tai-Kadai languages		1,750	0.11%	0.64%

Alameda County LEP Population				
Languages		ACS LEP Population (Speaks English Less than "Very Well")	Percent of Total County Population	Percent of Total LEP Population
Portuguese		1,700	0.11%	0.63%
Gujarati		1,530	0.10%	0.56%
Nepali, Marathi, or other Indic languages		1,470	0.10%	0.54%
Khmer		1,390	0.09%	0.51%
French (incl. Cajun)		1,230	0.08%	0.45%
Urdu		1,210	0.08%	0.45%
Other and unspecified languages		1,120	0.07%	0.41%
Other Indo-European languages		1,000	0.06%	0.37%
TOTAL		271,765	17.58%	100.00%

Source: U.S. Census Bureau, American Community Survey, 5-Year Estimate (2014-2018).

Because the Department of Transportation (DOT) guidelines regarding "Safe Harbor Provision" for translation of written materials requires the identification of "Safe Harbor Languages," careful attention must be paid to the absolute numbers as well as the percentage of the population that do not speak English in the development of the LAP Plan. FTA Circular 4702.1B states the following with respect to the Safe Harbor Provision:

The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

Based on these guidelines, 18 discrete languages—including the Primary and Secondary languages discussed in Section 1.2—have more than 1,000 persons who speak English less than "Very Well" and would qualify as "Safe Harbor" languages, requiring the translation of vital documents. According to Federal guidance, vital written documents include, but are not limited to, consent and complaint forms; intake and application forms with the potential for important consequences; written notices of rights; notices of denials, losses, or decreases in benefits or services; and notices advising LEP individuals of free language assistance services. While several language groups include more than 1,000, they have not been included in the Safe Harbor languages because they represent a variety of languages that may, independently, fall below the threshold. They also may represent a language family consisting of several individual languages, not one specific or individual language.

It is important to note that due to the size of the service area, the 1,000-person Safe Harbor threshold can sometimes represent a very small percentage of the overall population. For instance, while 6,770 Korean speakers indicate that they speak English less than “Very Well,” this equates to less than one-half of one percent (0.44%) of the total population in the county. Regardless, this language constitutes more than 1,000 individuals and would qualify for “Safe Harbor Provisions” along with several other languages that represent less than 1% of the service area population.

While specific languages within the group are not included in the Safe Harbor list, there may be a need to investigate whether there are unmet needs within this or other of these language groups that may result in some languages being included for written translations. This will be further discussed in Factors 2 and 3.

According to the guidelines set forth by the federal government, the LEP analysis should also review alternate and local sources of data to assist in Factor 1 findings. To provide further understanding of the languages that may require language assistance, data from the California Department of Education (DOE) 2019-20 Census of English Learners data on bilingual and English language learners was reviewed for Alameda County. The English Learner survey does not provide the most useful data for the LEP analysis, as it is collected among students and not the population as a whole. However, it provides another means of cross-checking census data findings. Below, Table 3: Department of Education Survey of English Learner Population 2019-20 provides a breakdown of the languages of the Department of Education English Learners reported for the school districts in Alameda County that have greater than one speaker.

Table 3: Department of Education Survey of English Learner Population 2019-20

Number	Language Name	Total	Percent of Total
1	Spanish	27,025	60.92%
2	Other non-English languages	2,562	5.78%
3	Cantonese	2,386	5.38%
4	Mandarin (Putonghua)	1,897	4.28%
5	Arabic	1,688	3.81%
6	Vietnamese	1,201	2.71%
7	Filipino (Pilipino or Tagalog)	1,089	2.45%
8	Farsi (Persian)	710	1.60%
9	Punjabi	698	1.57%
10	Telugu	698	1.57%
11	Hindi	603	1.36%
12	Tamil	390	0.88%
13	Korean	355	0.80%
14	Pashto	298	0.67%
15	Urdu	275	0.62%
16	Russian	229	0.52%
17	Tigrinya	211	0.48%
18	Japanese	187	0.42%
19	Khmer (Cambodian)	162	0.37%
20	Tongan	159	0.36%

Number	Language Name	Total	Percent of Total
21	Gujarati	133	0.30%
22	Marathi	130	0.29%
23	Portuguese	130	0.29%
24	French	122	0.28%
25	Amharic	109	0.25%
26	Burmese	102	0.23%
27	Bengali	83	0.19%
28	Kannada	77	0.17%
29	Toishanese	57	0.13%
30	Samoan	50	0.11%
31	Thai	50	0.11%
32	Turkish	44	0.10%
33	Hebrew	41	0.09%
34	Mien (Yao)	40	0.09%
35	German	40	0.09%
36	Ilocano	38	0.09%
37	Serbo-Croatian (Bosnian, Croatian, Serbian)	33	0.07%
38	Polish	32	0.07%
39	Lao	30	0.07%
40	Italian	24	0.05%
41	Indonesian	22	0.05%
42	Cebuano (Visayan)	19	0.04%
43	Rumanian	18	0.04%
44	Dutch	14	0.03%
45	Armenian	12	0.03%
46	Chaozhou (Chiuchow)	11	0.02%
47	Taiwanese	10	0.02%
48	Somali	10	0.02%
49	Greek	9	0.02%
50	Ukrainian	9	0.02%
51	Hungarian	8	0.02%
52	Hmong	8	0.02%
53	Assyrian	6	0.01%
54	Bulgarian	5	0.01%
55	Albanian	4	0.01%
56	Kurdish (Kurdi, Kurmanji)	2	0.00%
57	Marshallese	1	0.00%
58	Mixteco	1	0.00%

Number	Language Name	Total	Percent of Total
59	Swedish	1	0.00%
60	Swahili	1	0.00%

Source: California Department of Education Language Learner data 2019-20.

Using a compound analysis of the data sources, we find that all of the most prevalent languages are represented in these data sets. Table 4: Composite of LEP Languages, below, presents the ranking of the data sets that were used to help identify the Safe Harbor languages. Based on Factors 2 and 3, additional languages may be added or refined to reflect the better understanding of the service area's language needs.

Table 4: Composite of LEP Languages

Language	Alameda County ACS Ranking	AISD Learner Ranking
Spanish	1	1
Mandarin	2	4
Cantonese	2	3
Tagalog (including Filipino)	3	7
Vietnamese	4	6
Korean	5	13
Punjabi	6	9
Hindi	7	11
Arabic	8	5
Other languages of Asia	N/A	N/A
Amharic, Somali, or other Afro-Asiatic languages	N/A	36, 48
Persian (incl. Farsi, Dari)	9	8
Ilocano, Samoan, Hawaiian, or other Austronesian languages	N/A	30, 36
Telugu	10	10
Russian	11	16
Japanese	12	18
Tamil	13	12
Thai, Lao, or other Tai-Kadai languages	NA	31
Portuguese	14	23
Gujarati	15	21
Nepali, Marathi, or other Indic languages	N/A	22
Khmer	16	19
French (incl. Cajun)	17	24
Urdu	18	15
Other and unspecified languages	N/A	2

Sources: ACS, 2018 one-year sample Table B16001; and CA Department of Education Language Learner 2019-20.

1.3 Factor 1 Finding

Factor 1 of the LEP Plan was undertaken to assess the proportion of LEP individuals that may be encountered within Alameda County. A number of data sources were used as a way to inform the conclusions, including the American Community Survey (Census), the California Department of Education English Learners, and information from existing translation services provided by Alameda CTC. The findings reveal the following about languages spoken in Alameda County that will inform the Language Assistance Plan:

- 18 discrete languages qualify under the “Safe Harbor Provision” for written materials within Alameda County
- 2 Languages (Spanish and Chinese) represent the primary non-English languages spoken in the county
- 2 additional languages (Tagalog and Vietnamese) represent the secondary non-English languages spoken in the county
- The remaining 14 languages represent those that may require translation services but that are spoken less often by LEP populations in the county and include: Korean, Punjabi, Hindi, Arabic, Persian (incl. Farsi, Dari), Telugu, Russian, Japanese, Tamil, Portuguese, Gujarati, Khmer, French, Urdu

Below, Table 5: Safe Harbor Languages within Alameda County, combines the outputs of the data considered, and presents a ranking of the languages by the data considered. Using this to determine the prevalence of the Safe Harbor languages, four languages are identified as those that should be considered for written or verbal translation service: Spanish, Chinese, Tagalog and Vietnamese. However, only Spanish and Chinese could be considered predominant languages using all data sets, as they represent about 67% of the entire LEP Population.

Table 5: Safe Harbor Languages within Alameda County

Safe Harbor Language	Alameda County ACS Ranking
Spanish	1
Mandarin	2
Cantonese	2
Tagalog (including Filipino)	3
Vietnamese	4
Korean	5
Punjabi	6
Hindi	7
Arabic	8
Persian (incl. Farsi, Dari)	9
Telugu	10
Russian	11
Japanese	12
Tamil	13
Portuguese	14
Gujarati	15
Khmer	16
French (incl. Cajun)	17

Safe Harbor Language	Alameda County ACS Ranking
Urdu	18

Factor 2 Overview

Factor 2 includes the frequency with which LEP Populations come in contact with Alameda CTC's programs, activities and services. This factor can also influence the languages that are included in the LAP, as some language groups may require language assistance even though they are not identified by data.

Assessing the frequency with which LEP populations come in contact with Alameda CTC's programs, activities and service helps the agency determine which languages need to be considered for language services. Generally, "the more frequent the contact, the more likely enhanced language services will be needed."⁴ Strategies that help serve an LEP person on a one-time basis will be very different than those that may serve LEP persons on a daily basis. This analysis provides more clarity on the languages encountered and can help refine the languages requiring language assistance. This can also include adding languages for potential language assistance based on the agency employee's interaction with specific language populations.

For purposes of estimating the frequency of contact with LEP individuals, Alameda CTC programs and services were reviewed, and front-line employees that have direct connection with LEP populations were surveyed and/or interviewed. Surveys and interviews with CBOs were also reviewed for relevance. Copies of the Alameda CTC Staff and Consultant Survey and Alameda CTC Community Based Organization (CBO) Survey are available in the Appendix of this report. Other data sources, including ACS data, was also consulted.

2.1 Alameda CTC Services and Programs

Alameda CTC provides a variety of services and programs that were reviewed to better understand the populations that Alameda CTC may serve. The following provides a general description of the activities and the language assistance measures that may be available.

GENERAL ADMINISTRATION AND PLANNING

As the Congestion Management Agency and county transportation planning agency, Alameda CTC completes studies that engage local jurisdictions as well as residents through a number of planning activities. For example, as recipients of federal funds for identifying barriers to mobility and working to overcome them, Alameda CTC has completed a number of Community Based Transportation Plans (CBTPs) in the past that have solicited direct engagement from the community. These studies as well as other similar transportation studies help the agency set priorities for recommendations that are forwarded to the region for future funding.

When soliciting information from the public during the time this report was researched, flyers in English and Spanish were provided on the Alameda CTC website or may have involved other notification methods based on the type of studies being undertaken. For example, when preparing the Alameda County Transit Plan, relevant documents were translated into Spanish and Chinese and were available both on the Alameda CTC website and at public meetings.

⁴ Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons--A Handbook for Public Transportation Providers, 2007.

Alameda CTC also uses bilingual staff within their organization to provide informal interpretations or translation services for events and/or hearings, or when recording bilingual telephone recordings for project specific hotlines.

Alameda CTC has a number of program specific websites under its jurisdiction: alamedactc.org, accessalameda.org, alamedacountysr2s.org and grh.alamedactc.org. Material providing general Alameda CTC information, as well as project- and program-specific information, is provided on the website. While Google Translate is included on the Alameda CTC main website, it is not currently available on all program specific websites and for all languages. Additionally, some general information is provided in Spanish and Chinese on the website, and public outreach material for planning efforts like the Countywide Transportation Plan are also translated and posted.

Additionally, as a local sales taxing authority, Alameda CTC has an Independent Watchdog Committee (IWC) that provides reports to the public. These are translated into both Spanish and Chinese and posted to the Alameda CTC website and distributed in hard copy format to libraries and other public centers.

SAFE ROUTES TO SCHOOLS (SR2S)

Safe Routes to Schools (SR2S) in Alameda County is a program that encourages elementary, middle and high school students to walk or bike to school and promotes bicycle and pedestrian safety. The SR2S program includes educational events, student training, student incentives and safety projects in collaboration with school staff and volunteers, parents, police departments, public health staff, and city staff. Since 2006, the Alameda County SR2S program has focused on educating students at special events, enforcing traffic laws in school zones, installing safety improvements, and encouraging families to sidestep traffic in favor of “walking & rolling” to school. The program also performs “walk audits” with local engineering experts to assist the community in evaluating streets and identifying improvements for walking and biking to school. There is also a website dedicated to SR2S for those who want to access information directly (<http://alamedacountysr2s.org/>) which provides Google Translate in all available languages.

Because SR2S staff works directly with the school staff, parents, public health officials, police and cities, requests for language assistance typically do not come directly from the beneficiaries of the programs. However, due to input from the school staff and other participants, information about the programs is now provided in other languages and capacity exists to provide translated information upon request. Some information is also provided on their website in the form of PDFs in Spanish. However, some content is English-only, which may be appropriate given that school coordinators are staff that are not LEP.

STUDENT TRANSIT PASS PROGRAM (STPP)

Alameda CTC is responsible for the implementation of the STPP in Alameda County. The STPP provides free youth Clipper cards to eligible middle and high school students in Alameda County which can be used for unlimited free bus rides in their area (on AC Transit, Union City Transit or LAVTA Wheels), as well as a 50 percent discount on BART trips and youth discounts on other transit systems. The program makes it easier to travel to and from school and school-related programs, jobs and other activities, expanding transportation options for Alameda County's middle and high school students. Eligible students can apply online to receive a Clipper card that provides the discount. The website provides translations for all languages via Google translate including for the application process. It also provides fact sheets in Spanish, Chinese, Arabic and Farsi.

GUARANTEED RIDE HOME (GRH)

Their Guaranteed Ride Home program is designed to encourage the use of commute alternatives such as carpooling, vanpooling, public transit, walking or bicycling, by providing a free ride home to program participants in cases of emergency, unscheduled overtime, and other qualifying events. Those wishing to participate can register online at the GRH website (grh.alamedactc.org) or they can contact the GRH program administrator. The GRH program is also advertised through employers who may have ways of communicating the benefits of the program to their non-English employees. Currently, written information materials are not provided in languages other than English, although the basic information available on Alameda CTC's website about GRH can be translated using Google Translate via the website. However, the microsite where the majority of program information is located as well the program's registration page is not available for use with Google Translate.

PARATRANSIT PROGRAMS

While Alameda CTC does not directly provide paratransit services within the county, local funds are used by local jurisdictions to provide these services. When the Measure B ½ cent sales tax was reauthorized, it increased the percentage of net revenue for Special Transportation from 1.5 percent to 10.45 percent. These revenues fund operations for Americans with Disabilities Act (ADA)-mandated services and city-based paratransit programs. In 2014, the passage of Measure BB augmented funding to local cities and paratransit providers to continue transportation services through 2045. Even though the paratransit services are not directly provided by Alameda CTC, they do provide information related to the services and have a website geared towards paratransit users (<http://accessalameda.org/>). Website content is available for translation through Google Translate. Access Alameda is a resource guide provided through this program. It is available on the website and in print in English, Spanish, Vietnamese, Farsi, Chinese and Tagalog.

2.2 Alameda CTC On-site Language Assistance Services

Alameda CTC provides varying degrees of inclusive language assistance tools for LEP persons, some practices are concrete and specific, while other measures are informal.

According to Alameda CTC staff, the agency relies on informal systems to determine which vital documents it translates from English into other languages. The agency standard is to translate into Spanish and Chinese, largely assisted by professional translation services and bilingual Alameda CTC employees as needed. At the time this report was researched, multiple staff identified as speaking Spanish, and staff who speak Chinese (Mandarin and Cantonese), Hindi, Punjabi, Tamil, Vietnamese, Russian, French and Czech.

At the time this report was researched, LEP persons requesting language assistance were reliant on the Alameda CTC's unofficial language assistance policy. When LEP callers call into the agency for translation services, they were directed to an appropriate person, depending on the nature of the request. Safe Routes to Schools Site Coordinators seeking translation services for parents did not have formal systems set in place for adult LEP family members utilizing SR2S services. Alameda CTC relied on the California Department of Transportation (Caltrans) staff for interpretation or translation services when conducting in-person/virtual open-houses that were sponsored by Caltrans. Alameda CTC staff provided ad hoc interpretation for LEP attendees asking for translation services during in-person events if Alameda CTC staff speaking those languages were available and in attendance. Staff noted that for virtual open-houses, LEP attendees utilize the Google Translate function on the Alameda CTC website.

Since this report was initially researched, Alameda CTC has implemented a translation assistance telephone service that staff may access when they receive a call from an LEP caller. The service provides real-time translation services so that the LEP caller and agency staff can communicate with each other. As they are updated, publications and fact sheets are also being edited to include directions in English about how LEP persons may request translated documents.

2.3 Alameda CTC Website

The Alameda CTC website currently uses Google Translate for a variety of languages that have historically been requested, but does not include the full list of languages that Google Translate provides. While not as accurate as a translator, Google Translate provides cost effective methods of addressing the immediate needs of LEP populations who speak lightly used languages. It can also be used as a method of translating text in a rough manner that can then be corrected by native speakers, thereby saving time on translations.

Google Translate is available on the Alameda CTC, Safe Routes to Schools (SR2S), and Student Transit Pass Program (STPP) websites. While the limited Google Translate function translates webpages into several languages, including several of the Alameda CTC's Safe Harbor languages, it does not translate PDF documents into other languages.

All Board Meeting Agenda notices since March 2018 advertise free language assistance. In addition to English, the notice is provided in Spanish, Chinese and Vietnamese. While free language assistance is available to LEP stakeholders, it was not consistently posted front and center throughout the Alameda CTC website, on all public notices, microsites and other websites operated on behalf of Alameda CTC at the time of this report's research. Directions for how LEP persons may request translation assistance is now consistently and visibly posted on the agency's website.

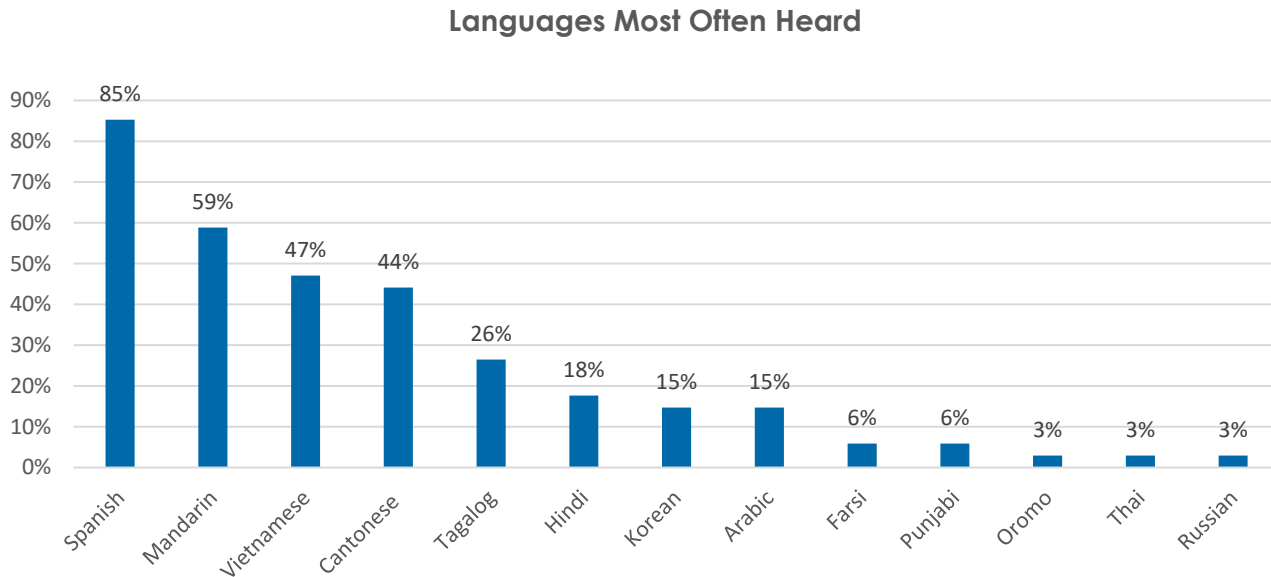
2.4 Frontline Staff Consultation

To better understand the languages that are most encountered by Alameda CTC staff, surveys and interviews were conducted during this report's research phase. These surveys provided some broad understanding of the frequency of contact, while the interviews provided an in-depth look at the practices of those encountered and the language needs of Alameda CTC's LEP stakeholders. In addition to asking questions about language interactions and requests, the survey asked questions on methods that could improve Alameda CTC's outreach and communication to LEP communities.

The employee survey was posted online via Google Forms to ensure that all employees and consultants would be able to participate. Alameda CTC publicized and distributed the survey to select Alameda CTC staff and consultants. Alameda CTC staff and consultants received the internal survey through an email and staff received verbal reminders during their team meetings. Survey results are included in Appendix A: LEP X Survey. A total of 34 employees and consultants completed the survey.

The survey results found that Spanish was the predominant language most often heard when interacting with the stakeholders or members of the public, which also corresponds to the ACS data. Other languages from Factor 1 are also heard in significant numbers, including Chinese (Mandarin and Cantonese), Vietnamese, Tagalog, Hindi, Arabic and Korean. Several other languages were also heard including Punjabi and Farsi. Table 6 presents the findings on the following page:

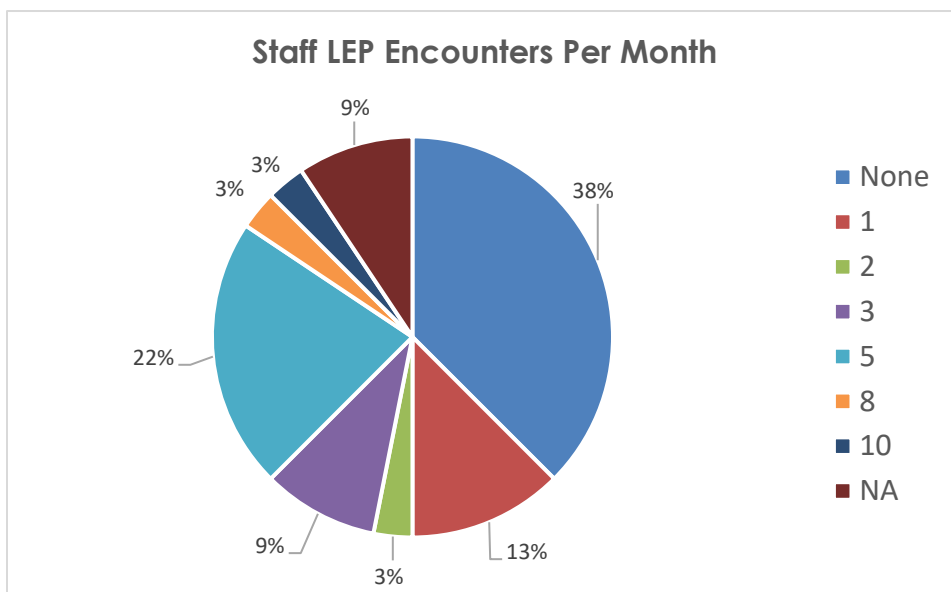
Table 6: Top Languages Heard by Alameda CTC Staff and Consultants



Does not add to 100%, as respondents could select up to five options

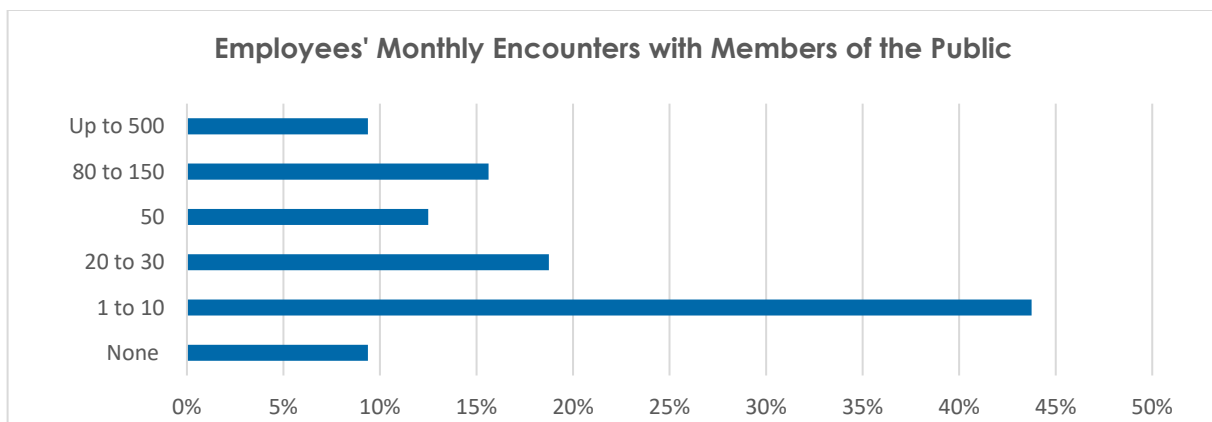
More than half of survey respondents (63%) indicated that they encountered, on average, fewer than 5 LEP persons per month, and almost 38% indicated that they never encountered LEP persons and/or members of the public who are seeking assistance and are unable to communicate well in English. Figure 1: Frequency of LEP Stakeholder Encounters, below, presents the frequency of contact with LEP stakeholders.

Figure 1: Frequency of LEP Stakeholder Encounters



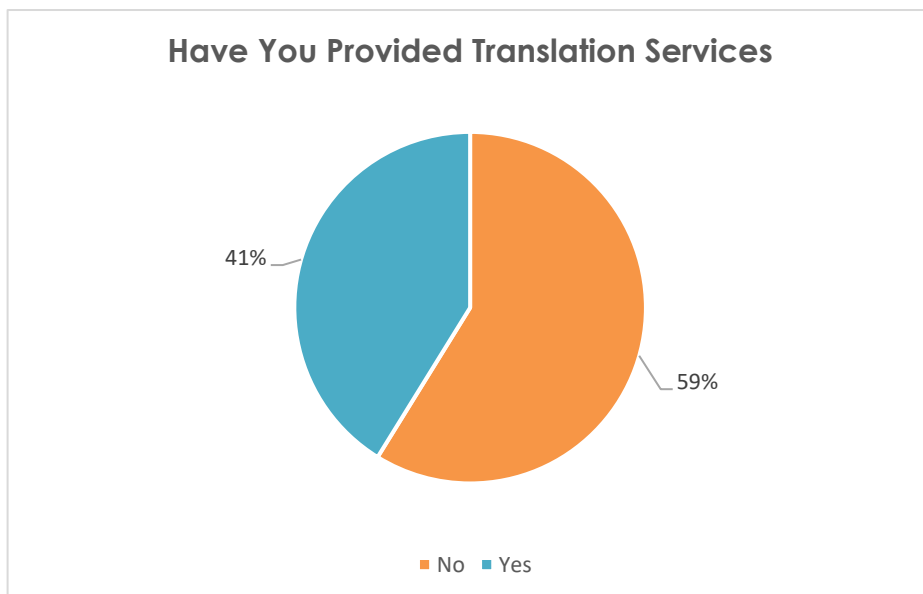
This is not unusual for an agency that has a more capital project-driven outreach, as encounters with the general public may also be fairly low. At the time this report was researched, Alameda CTC Staff and Consultants were asked how many members of the public they come in contact with on an average month in person, via email, by phone or virtual meeting. In response, greater than 53% noted that they encountered fewer than 10 members of the public per month, with almost 10% never encountering the public. It's clear though that there are differences based on staff responsibilities, because almost 10% indicated that they often had encounters with greater than 500 members of the public per month, as reflected in Table 7: Members of the Public Encountered per Month, below.

Table 7: Members of the Public Encountered per Month



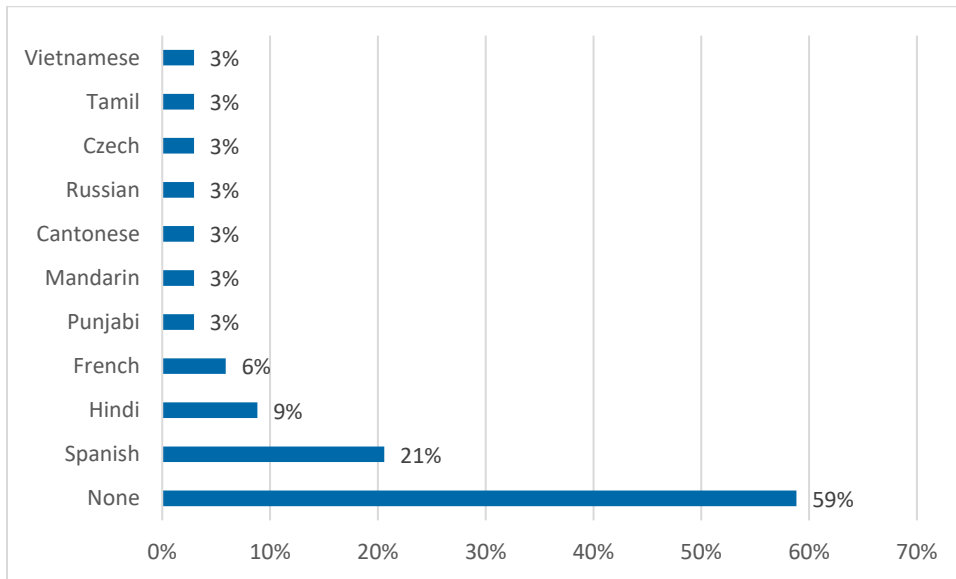
Also, when asked if they ever provided translation services for LEP populations, almost 60% of the employees indicated that they had not, as reflected in Figure 2, below. 41% indicated that they had provided written translation services for both Spanish and Chinese populations.

Figure 2: Staff Providing Translation Service to LEP Populations



When asked about whether they spoke another language proficiently, almost 60% indicated that they did not. However, 14 staff members and consultants indicated at the time this report was researched that they spoke a variety of languages, as reflected below in Table 8: Percentage of Staff and Consultants who speak Other Languages (Conducted in 2021).

Table 8: Percentage of Staff and Consultants who speak Other Languages (Conducted in 2021)



The final question posed to employees was, “Are there any resources you need to assist you in communicating with members of the public?” A significant proportion (44%) provided very useful suggestions that have been incorporated into the plan. The verbatim comments were:

- *I don't have immediate resources for Mandarin or other languages that come up, either for verbal communication or translating materials.*
- *Easy access to translation services. It would also be important that when working on large projects, to do outreach/provide information via TV or radio stations broadcasting for the diverse communities in the County. I am aware of the Spanish TV/Radio, but there are media stations in different languages that could help us conduct outreach in those communities.*
- *Translation services*
- *Translation services for written translations of public facing documents*
- *Sign Language*
- *Training on what to do when caller does not speak English. It would be nice to have a reference list of staff who would be able to help translate certain languages. For example, if we have member of the public on the phone who does not speak any of the languages I speak, I would like to know who is available to help translate and transfer the call.*
- *All our resources should be accessible to the public we serve following a good LEP*

- *It would be really helpful to have translation and interpretation services available for all staff to access for planning/projects/programs outreach. Thank you for the work on this important topic.*
- *I'm relatively new, so haven't learned yet what existing language resources exist.*
- *In addition to translating materials, it would be helpful to have translators available to attend meetings and other in-person events to help with communication. I'm mostly interested in Spanish, Cantonese, and Mandarin translators.*
- *As there may be non-English speaking residents in West Oakland that are not being reached about GoPort due to language barriers, it would be helpful to have the following:*
 - *Access to translation services for GoPort literature, emails, newsletters, mailings, etc. in Spanish and other languages spoken in West Oakland.*
 - *Information on telephone interpreter services.*
- *Our consultant team only has the ability to QC [quality control] Spanish and Chinese translations. We do not have staff that are native speakers of the other languages we use (Tagalog etc...) We anticipate that many of the translated texts may have the same issues that we see in the Spanish, but we have no way of identifying or rectifying the issues. To ensure that we are communicating in a way that is culturally competent and effective, there are two solutions that could help: 1) review and QC of all translated materials by native language speakers, or 2) working with native language speakers to create the text from scratch, rather than translating from English.*
- *For the CTP, it would've been nice to have clearer guidance from the agency on what is needed/ideal for outreach related to a planning effort. Many times, we are commenting on scopes of work from outreach consultants and they ask us what are our policies/recommendations with respect to language coverage. Having some guidelines or rules of thumb would be great. If you're curious on what we ended up doing, see the outreach summary report for the CTP: https://www.alamedactc.org/wp-content/uploads/2020/12/2020_CTP_Final_Outreach_Summary_Report.pdf*
- *I need assistance with consultative services for both translation and interpretation for SR2S provided in the top five languages listed previously in this survey.*
- *We have not yet done much public outreach, more efforts where we communicate in writing. When we "open up" and begin to communicate directly with the public, we may need interpreters in the languages that are most spoken in Alameda County and communication assistance for deaf and blind people.*

2.5 Staff Survey Major Findings

The employee survey results lead us to draw the following conclusions.

- 1) Contact with LEP members of the public is limited to just a handful of employees and consultants working at Alameda CTC. And, even when public contact is more often, there are typically very few members of the public that require language assistance.
- 2) The languages most often heard by staff correspond to the languages identified in Factor 1.
- 3) At the time this report was researched, several employees and consultants spoke languages other than English, enabling them to engage members of the LEP community directly and providing a pool that LEP persons could be referred to if necessary. However, the ability to provide written translations for additional languages is still desired.

- 4) While translations are often available in Spanish and Chinese, the need to improve translation services for other languages would assist staff and consultants with additional LEP language needs.

2.6 Community-Based Organization Consultation

In addition to conducting interviews with employees, online surveys and interviews were conducted with four community-based organizations (CBOs) located in Alameda County using a list of contacts suggested by Alameda CTC staff. The list of contacts was compiled by Alameda CTC staff prior to the email with the survey link being sent to CBOs. Additional outreach was done with each non-respondent organization contacted via telephone to ensure delivery of the survey link to the appropriate CBO staff member and to encourage participation. A copy of the survey is included in Appendix A.

A total of 22 organizations were contacted:

- Bay Area Urban Debate League
- Center for Independent Living (CIL)
- Centro de Servicios/Resource Center
- City of Fremont Human Services Department - Aging and Family Services Division
- Community Resources for Independent Living (CRIL)
- East Bay Sanctuary Covenant
- Eden I&R/211
- Hispanic Community Affairs Council
- Indo-American Seniors Association Fremont (INSAF)
- Kenneth Aitken Senior Center (Castro Valley)
- Korean Community Center of the East Bay
- La Pena Cultural Center
- LIFE ElderCare
- Mastick Senior Center (City of Alameda)
- Oakland African American Chamber
- Oakland Asian Cultural Center
- Oakland Chinatown Chamber of Commerce
- Pleasanton Library and Recreation Department
- Tri-City Senior Peer Counseling
- The Unity Council
- United Seniors of Oakland and Alameda County (USOAC)
- Vietnamese American Community Center of the East Bay

Survey respondents were given the option to complete the survey link anonymously. The following four organizations completed the survey link and identified their affiliations:

- Oakland Asian Cultural Center
- Pleasanton Library and Recreation Department
- United Seniors of Oakland and Alameda County (USOAC)
- The Unity Council

Survey questions were designed to obtain demographic information on the populations that the CBOs serve, what their LEP clients need from Alameda CTC, the types of information needed, methods of communication with the populations, and methods of delivering the information.

2.7 CBO Summary Findings

Each CBO reported serving a specific geographic area, with three serving particular districts or cities within Alameda County, and one serving people within the entire county. Respondents also reported that the number of people their organization serves changed with COVID-19. Prior to the pandemic, one organization served 25,000 people; when this survey was conducted the number was 10,000. One group reported typically serving 100 people throughout the year; another a little over 11,000 people; and two groups provided services or advocated for 2,500 to 3,000 people.

The CBOs reported serving, in addition to U.S. born individuals, individuals whose countries of origin include China, India, Afghanistan, Iran, Mexico, Guatemala, El Salvador, Japan, Cambodia, Korea, the Philippines, and Vietnam, as well as other Middle Eastern countries.

When asked the top five primary languages spoken by their population, all CBOs reported serving Chinese-speaking individuals. Another 80% list English as one of the primary languages. More than half say their clients speak Vietnamese; 40% list Spanish as a primary language. Other languages mentioned as being one of the top five languages spoken by their populations include Korean, Tagalog, Arabic, Mum, Hindi, Punjabi and Farsi.

Respondents were asked to identify which age groups they served, providing age groups that included "Youth (under age of 17);" "Adults (18-64);" "Seniors (65 and older);" and "All Ages." Four CBOs reported serving all three age groups; one reported serving Seniors.

Among those able to assess the literacy level of their clients in their native language, about 60% believed it was proficient while the remainder believed it is basic or below basic. English literacy was perceived by the CBOs as markedly lower: 60% believe it was below basic, while 20% saw it as basic or intermediate, and none deemed the English literacy level of the people they serve as proficient.

Next, the CBOs were asked to what degree their populations rely on Alameda CTC's programs and services including Safe Routes to Schools, other bicycle and pedestrian projects and programs, paratransit, senior and disabled programs, and the Guaranteed Ride Home program. Organizations were asked to report their populations' reliance using the characterizations "A great deal;" "Some;" "Very little;" and "Not at all." More than half of the CBOs said their clients were reliant on Alameda CTC's programs and services to some degree. Only one CBO reported its population relying on Alameda CTC programs and services a great deal, another one reported its reliance as very little.

When asked what difficulties their populations encounter in using Alameda CTC's programs and services, their verbatim responses were:

- *Doesn't know about Guaranteed Ride Home program. No difficulties.*

- *I am not familiar with these programs or how frequently they are being used by our audiences, so I do not know what difficulties they may be having in using Alameda CTC's programs.*
- *Not aware.*
- *Accessibility, hours of operations, information on program availability, requirements and benefits. They're not aware of the programs offered. Educating them on available programs and services. Also hesitant about having to rely on an agency or organization for transportation, 7 day in advance requirement and not having a specific time for pick-up and drop-off, or just having a window, is a deterrent. Also giving up their independence is hard for them to accept; they don't want to be a burden on anyone so they don't use the services. Learning a new system can be overwhelming for them.*

When asked the best way to obtain input from their populations in order to better serve them, the CBOs named a number of steps. Verbatim responses included:

- *Best way to obtain input is by the telephone.*
- *I think posting printed notices, direct mail, WeChat communications in Chinese and Vietnamese may be helpful. Incentives like free swag & prize drawings may help encourage engagement.*
- *Having a language translator or interpreter to send out information in their own language [for] written materials... talking about Chinatown specifically. Try to work with more respected organizations like Asian Health Services because [they] already have good relationships with the audience.*
- *By talking to them, calling, or sending written information (flyers, email, social media)*
- *Surveys (on-line, in-person and on paper) are good, focus groups are good. Coming to speak and asking them in person. Calling them.*

Offering the two or three things their populations need from Alameda CTC to be better served, CBOs primarily focused on improving accessibility in LEP stakeholder's native languages. Specific suggestions included the below, some of which reflect concerns specific to when the interviews were conducted in 2021:

- *Update the Access Guide 2018... during COVID a lot of those programs and phone numbers have been changed. Oakland and Emeryville had changes and paratransit had changes.*
- *Safety may be a very relevant issue and potential barrier to using transportation programs as Oakland Chinatown has seen an escalation in anti-Asian violence.*
- *Getting information about Alameda CTC programs in native languages through social media apps. Using WhatsApp for Chinese American community, using KakaoTalk (Katakalk) for Korean American community. 90% of both communities use these apps.*
- *Information on program availability, requirements and benefits.*
- *1. Financial discounts. 2. Building partnerships with the agencies that serve [clients] so that information is getting out to them from a trusted source... that Alameda CTC is out in the community and visible. 3. Provide all materials and collateral in population's language of choice. 4. Having staff that look and talk like [CBO client population].*

Finally, CBOs were asked what suggestions, if any, they had for Alameda CTC when it comes to communicating with their population. Responses included:

- Getting information about Alameda CTC programs in native languages through social media apps. Using WhatsApp for Chinese American community, using KakaoTalk (Katak) for Korean American community. 90% of both communities use these apps.
- Share proactively resources and services available.
- Having Mandarin, Cantonese, Hindi, Punjabi and Farsi speakers. I think native English speakers take for granted that representation on their staff is needed. I think if you have a paid staff person that comes from their community it flows better, it feels better. It's different when you can have someone speak with you in your own language versus having someone in English communicate and then have someone else translate for you. It's better received from the community if the person can just use their native language. Age Well Center is for all of Fremont not just English speakers.
- None.

According to these CBOs, and as would be expected, when it comes to reaching out to their LEP populations, the CBOs advocated for more communication in native languages and outreach on the part of Alameda CTC. It appears a number of these CBOs would be willing to assist Alameda CTC in their outreach, and Alameda CTC could consider enlisting their and others' help in order to reach more LEP persons within the county.

2.8 Factor 2 Summary Findings

Combined survey results led us to draw the following conclusions:

- 1) Contact with LEP members of the public is limited to just a handful of employees and consultants working at Alameda CTC. And, even when public contact is more often, there are typically very few members of the public that require language assistance.
- 2) While Alameda CTC does a good job addressing the needs of the few non-English speakers that currently access the agency's website, providing additional translations on the website may improve access to information for LEP populations.
- 3) The languages most often heard by staff correspond to the languages identified in Factor 1.
- 4) At the time this report's research was conducted, several employees and consultants spoke languages other than English, enabling them to engage members of the LEP community directly and providing a pool that LEP persons could be referred to if necessary. However, the ability to provide written translations for additional languages is still desired.
- 5) While translations are often available in Spanish and Chinese, the need to improve translation services for other languages would assist staff and consultants with additional LEP language needs.
- 6) CBOs remain a valuable asset in helping achieve language assistance goals, including the ability to reach LEP populations in their native language.
- 7) Utilizing social media apps such as WhatsApp and Kakao Talk are recommended as necessary in disseminating information about Alameda CTC programs to LEP persons, especially Chinese and Korean speakers.

Factor 3 Overview

Factor 3 includes the nature and importance of the program, activity, or service provided by the recipient to people's lives. "The more important the activity, information, service, or program, or the greater the possible consequences of the contact to the LEP individuals, the more likely language services are needed."⁵

Because this report's research was conducted during the COVID-19 pandemic, circumstances did not permit surveying individuals who directly seek out Alameda CTC's services. In place of the standard approach, alternative steps were taken to gathering information for this factor's analysis. First, input was taken from the staff survey. Second, information from interviews with key staff in relevant departments referenced in Factor 2 was also used. The interviews provided insight into the needs the public may have in accessing Alameda CTC planning activities, as well as the more specific programs such as paratransit and SR2S. Interviews included key staff in several departments, including but not limited to Administration, Communications, GoPort, Planning, Projects and Safe Routes to Schools. These surveys and interviews also helped to understand how important these or other programs are to the general public and how the ability to speak English may impact access to the programs.

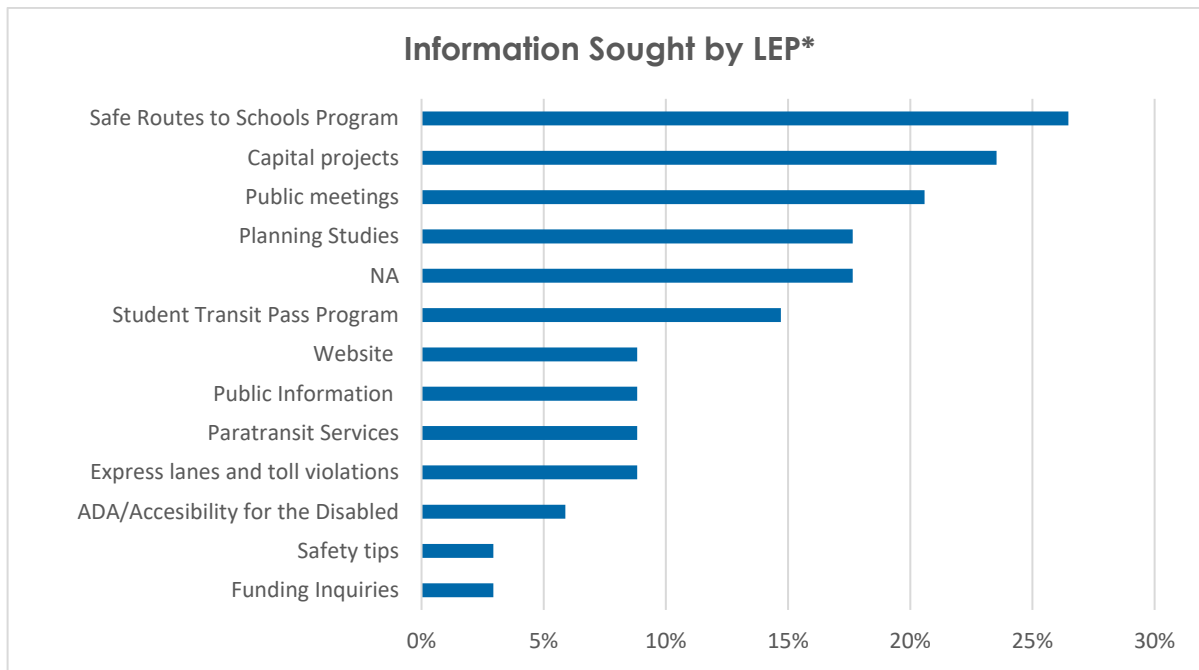
3.1 Employee Survey

Employees were asked what information was being sought by the LEP population, which can provide more clarity on how LEP persons may be interacting with the agency. When asked about the services most sought by the LEP public, Safe Routes to School services was listed as the greatest percentage of responses (26%), which corresponds to the outward-facing nature of the program. This was followed by Capital Projects, Public Meetings, Planning Studies and the Student Transit Pass Program. A significant number had indicated "NA" (Not Applicable), which corresponds to those who have little interaction with the public in general and with LEP populations, specifically.

Almost 10% of customers are either seeking information about the Alameda CTC website, public information, paratransit services or express lanes and toll violations. This signals that stakeholders calling into Alameda CTC are likely to need service-related language assistance. (See Appendix A: Agency Survey Questions.) Table 9 on the following page presents the survey responses referenced.

⁵ Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons--A Handbook for Public Transportation Providers, 2007

Table 9: Information Being Sought by LEP Public



*Does not add to 100% because respondents could choose multiple options.

3.2 CBO Survey

As discussed in Factor 2, the CBOs also provided information about their clients' use of Alameda CTC programs and services including Safe Routes to Schools, other bicycle and pedestrian projects and programs, paratransit, senior and disabled programs, and the Guaranteed Ride Home program. This information helps explain how important these services may be for them. Organizations were asked to report their populations' reliance using the characterizations "A great deal;" "Some;" "Very little;" and "Not at all." More than half of the CBOs say their clients are reliant on Alameda CTC's programs and services to some degree. Only one CBO reported its population relying on Alameda CTC programs and services a great deal, another one reported its reliance as very little.

Also noted in the previous section on Factor 2, when CBOs were asked how many people they provide services to or advocate on behalf of each year, the numbers varied widely. The broad range was in large part due to the effects of the pandemic, during which the research for this report was conducted. Prior to the pandemic, one organization served 25,000 people; when this survey was conducted the number was 10,000. One group reported typically serving 100 people throughout the year; another a little over 11,000 people; and two groups provided services or advocated for 2,500 to 3,000 people.

In terms of languages spoken by the LEP members of the public they encounter, Chinese (Cantonese and Mandarin) were identified as the primary language spoken. Three organizations said their clients speak Vietnamese while two CBOs list Spanish as a primary language.

All responding CBOs typically provide translation or interpretation services for Chinese (Mandarin and Cantonese) speakers and two do so for Spanish-speaking LEP persons. At least one of the CBOs reports providing interpreter and

translation services in Vietnamese, Arabic, Mum, Hindi, Punjabi and Farsi. The agency that provides translation or interpretation services for Farsi-speaking LEP persons does not do so themselves; an outside organization provides this service.

When asked which languages the CBOs use interpreters for when hosting live or virtual events, four CBOs do so for Chinese (Mandarin and Cantonese) speakers; and at least one CBO provides this service for its LEP Spanish, Arabic and Mum speaking clients. It is worth noting that the CBO with Hindi, Punjabi and Farsi LEP speakers did not find it necessary to hire an interpreter for live and virtual events as the events are held in the population's native language and do not include English presentations. While it was unconfirmed, this may also be the reason why no CBOs reported utilizing Korean, Tagalog or Vietnamese interpreters when hosting live or virtual events.

Providing critical information in languages most commonly used by the LEP community ensures that LEP population can access the services and programs that Alameda CTC provides. Frequent connection with CBOs serving these populations, with LEP users themselves, and with the agency's own employees and consultants will provide feedback on Alameda CTC's success in continuing to ensure all have equal access to the services and programs that Alameda CTC provides.

3.3 Summary Findings

Using input from the surveys described in the Factor 2 analysis, along with the consultation with staff and CBOs, it is clear that some of the programs have a greater importance to individuals than other programs, namely paratransit. The bulk of CBOs surveyed indicated that increasing awareness about Alameda CTC programs and services would be useful for its LEP population.

This report's surveys and interviews indicate that the LEP community does not have extensive contact with many of Alameda CTC's programs and services. Still research shows there is an obvious need to ensure LEP individuals are able to access the services and programs of the agency. To the extent it is practical, ensuring that critical information is available in languages most commonly spoken within Alameda County is important to providing access to Alameda CTC services. It is assumed that Alameda CTC will need to continue to assess and identify program components that may require language assistance to LEP stakeholders. This includes information on services, programs and benefits of their programs that may be limited to those who are proficient in English. By identifying the most critical elements to ensure LEP access, Alameda CTC can routinely assess programs and activities to avoid language barriers that could have serious consequences to LEP stakeholders.

Factor 4 Overview

Factor Four includes a review of the resources available to Alameda CTC and the cost associated with translation services. This provides context for the extent and frequency of recommended language services that Alameda CTC can provide within their current budgetary setting.

Alameda CTC currently provides language services in Spanish and Chinese, including translation and interpretation services at public meetings and translation of public outreach materials and additional translated languages based upon project-specific requirements. Currently, translation and interpretation services are provided for general communications needs as component of a contract for communication and outreach services with a designated budget for LEP services. Additionally, project-specific contracts (e.g., capital projects and/or planning studies) also

include language assistance services as part of the project's outreach budget. However, those costs are not typically identified within the contract budget as a separate line item.

Not including project-specific outreach, which has translation items included in their individual budgets, approximately \$31,000 was spent per year on translation services at the time this report's research was conducted. However, translations for specific projects, which are paid for within their individual budgets, could exceed \$15,000 a year per project at the time of research. The \$31,000 annual charge did not include routine printings of previously translated materials, as those expenses are difficult to segregate. The existing communications and outreach services contract at the time of this research had budgeted at \$141,000 for three fiscal years.

It should be noted that currently, Alameda CTC staff are called upon to provide some translation or interpretation services at no additional cost to the agency. It is possible that contributing staff bill their time to specific projects or other line items. This practice will continue if staffing continues to offer this option.

Alameda CTC assessed its available resources that could be used for providing LEP assistance, including determining the cost of a professional interpreter and translation service on an as-needed basis, along with which of its documents would be the most valuable to be translated if the need should arise. The amount of staff training that might be needed was also considered to ensure that the staff understands how to access language assistance tools and resources.

4.1 Factor 4 Summary Findings

Alameda CTC has budgeted a substantial amount to provide Language Assistance Measures to the community. As they move forward in providing more language services, there are a few recommendations toward budgeting and resource allocation that can improve their practice:

- 1) All project-specific budgets should include line item costs for translation or interpretation services not only to ensure that those language services occur, but to better budget in the future for similar projects.
- 2) Requests for translation and interpretation services should be tracked, both for general outreach as well as project-specific outreach, to enable the Alameda CTC to be more responsive to LEP populations and gear future language assistance measures toward known needs.
- 3) Because staff is one of the greatest resources that an agency has, continuing to use bilingual staff for language services will leverage an already available resource, and remains one of the best ways to achieve staff buy-in for providing language assistance measures.

Four Factor Findings and Strategies

The Four-Factor analysis provides clear support for Alameda CTC's approach to universal access to its services and programs regardless of English language proficiency and language spoken. Among the highlights of this analysis are:

- **Factor One:** At the time research was conducted, over 18% of the population in the service area did not speak English very well and are considered to have Limited English Proficiency. One language—Spanish—remained the predominant LEP language in the county, amounting to 7% of the population, followed by Chinese (Mandarin and Cantonese) at 5%. 18 languages are included as Safe Harbor languages, in order of prevalence: Spanish, Chinese (Mandarin & Cantonese), Tagalog (including Filipino), Vietnamese, Korean, Punjabi, Hindi, Arabic, Persian (incl. Farsi, Dari), Telugu, Russian, Japanese, Tamil, Portuguese, Gujarati, Khmer, French, Urdu.

- **Factor Two:** The LEP community infrequently accesses Alameda CTC's information, and only a small number of Alameda CTC's staff crossed paths with persons needing language assistance. Greater than 53% indicated that they encounter fewer than 10 members of the public per month, with almost 10% never encountering the public.
- **Factor Three:** As indicated in the results of all surveys and interviews, while there is not extensive contact with the LEP community among many associated with Alameda CTC, there is an obvious need to ensure LEP individuals are able to access the services and programs of the agency. Additionally, the majority of the CBOs contacted responded that their clients did not regularly seek information from Alameda CTC other than for Access Alameda information for paratransit (senior and disabled) services. However, ensuring that critical information is available in languages most commonly spoken within Alameda County is important to providing access to Alameda CTC services.
- **Factor Four:** The analysis shows that Alameda CTC has budgeted a significant amount towards language assistance measures, and intends to include language assistance measures into the myriad activities that they currently undertake to ensure that people who do not speak English very well are able to access their information and services as easily as the general population. Additionally, recommended changes will help Alameda CTC plan into the future to monitor and budget their activities to ensure they are cost effective and help those with the greatest need.

2. Limited English Proficiency: Language Assistance Plan

Language Assistance Plan Overview

The DOT LEP Guidance recommends that recipients develop an implementation plan to address the needs of the LEP populations they serve. The DOT LEP Guidance notes that effective implementation plans typically include the following five elements: 1) identifying LEP individuals who need language assistance; 2) providing language assistance measures; 3) training staff; 4) providing notice to LEP persons; and 5) monitoring and updating the plan.

This plan represents the most recent Language Assistance Plan prepared by Alameda CTC to comply with the federal guidance. As such, while some measures are in place, other methods of providing language assistance will need to be implemented over time to ensure full compliance with Federal requirements.

2.1 Identifying LEP Individuals Who Need Language Assistance

The Four-Factor analysis discussed earlier in this report considered a number of data sets to determine the languages that would require “Safe Harbor” consideration, in addition to languages predominantly used by residents within Alameda County. The data included Census data (American Community Survey 5-year sample 2014-2018), and the Department of Education English Learners data. At the time research for this report was conducted, approximately 18% of the population in the service area spoke English less than “Very Well” and would be considered the LEP population.

The findings reveal the following about languages spoken in Alameda County that will inform the Language Assistance Plan:

- 18 discrete languages qualify under the “Safe Harbor Provision” for written materials within Alameda County
- Two Languages (Spanish and Chinese) represent the primary non-English languages spoken in the county
- Two additional languages (Tagalog and Vietnamese) represent the secondary non-English languages spoken in the county
- The remaining 14 languages represent those that may require translations services but that are spoken much less often by LEP populations in the county: Korean, Punjabi, Hindi, Arabic, Persian (incl. Farsi, Dari), Telugu, Russian, Japanese, Tamil, Portuguese, Gujarati, Khmer, French, Urdu

Because Spanish and Chinese remain the predominant languages of LEP households, Alameda CTC will continue to focus language assistance to Spanish- and Chinese-speaking populations. However, based on the Four-Factor Findings, there is a need for more language translations beyond Spanish and Chinese.

2.2 Providing Language Assistance Measures

Alameda CTC uses various methods to accomplish the goal of providing inclusive language assistance but is planning on enhancing those methods to include all necessary languages. Specific methods pertaining to outreach are discussed in the Alameda County Public Participation Plan unless they are related specifically to the benefits or services that Alameda CTC provides.

At the time of the plan's research, Alameda CTC's primary language assistance tools included:

- Spanish and Chinese translations on some informational brochures and meeting notices
- Translated materials on the Alameda CTC website, Access Alameda website, and Safe Routes to Schools websites
- Translation of Notice to Beneficiaries and complaint form in Spanish and Chinese
- Google Translate on the Alameda CTC, SR2S, STPP and Guaranteed Ride Home websites
- Translators and interpreters at designated public meetings and upon request at other meetings
- Posting project-specific meeting notices, hotline telephone recordings, and/or news releases and advertisements to newspapers in other languages
- Ad hoc language assistance provided by bilingual staff as appropriate
- CBO assistance in outreach to LEP populations and translation and interpretation assistance
- Targeted translation of certain documents (i.e., Access Alameda resource guides) in additional safe harbor languages, including Farsi, Tagalog and Vietnamese.

The following are recommendations that would improve the level of translation assistance that Alameda CTC provides to its LEP populations and that can be implemented over time as budget and staff permits. Contained in Appendix B: Language Assistance Plan Recommendations is a list of all recommended activities that are either being implemented or are ones that Alameda CTC desires to undertake to fully support its Language Assistance Plan and corresponding Public Participation Plan. These activities are organized into four categories:

- 1) General, including such things as internal awareness and public outreach strategy
- 2) Materials and Documents
- 3) Translation and Interpretation Tools and Protocols
- 4) Employees, including training or incentives to empower employees to provide assistance

General Title VI and LEP Awareness

Title VI and LEP awareness are the cornerstone of the entire Title VI program and can promote understanding within the agency. A number of recommendations may help to improve the practice:

- **Title VI awareness training:** integrate Title VI awareness into all activities of the agency
- **Public engagement needs and strategies:** formalize internal department public engagement activities by developing a public engagement strategy, and develop a protocol that includes procedures, roles and responsibilities for all departments that interact with the public including incorporating language assistance measures.

- **Project Charter:** develop a process to ensure that Title VI and/or LAP issues are acknowledged and addressed by each department's project manager, including a form outlining the LEP strategy that is submitted to the Title VI officer for approval.
- **Demographic analysis of new project areas:** consider the attributes of the people in the geography of the project or outreach area.
- **Eliminating English-only informational efforts:** include Spanish or other languages as appropriate; include "Free Language Assistance" text box at a minimum to ensure participation of LEP populations.
- **Develop or enhance relationships with Community Based Organizations:** continue to expand the CBO database and engage CBOs to improve communication methods; build partnerships with agencies serving LEP populations so that Alameda CTC is visible, and information about the agency is coming from a trusted source.
- **Contract compliance:** ensure that contracts contain language that includes requirements to provide public information that complies with Title VI LEP guidelines.

Materials and Documents

- **Title VI Public Notice, Complaint Form and Procedures** (Vital Document): notice should be in all Safe Harbor languages on the website and posted on-site in locations such as the Board room, General Office lobby, or other public areas; provide translations on the website.
- **Notice of Free Language Assistance** (Vital Document): notice of free language assistance should be located on mast head of website in a text block and included in all printed and digital materials; this should also be printed at the bottom of the Title VI Notice and posted on-site in locations such as the Board room, at the General Office lobby, or any locations where stakeholders may be alerted.
- **Legal Notices** (Vital Document); translations of legal documents should be translated upon request.
- **Registration Forms** (Vital Document): make sure that all registration forms on the website can be translated using online tools (Google Translate or others) and for printed materials, forms should be translated into Spanish with "Free Language Assistance" printed at the bottom of all forms.
- **Safety and Security Information:** use pictographs as much as practicable. QR codes can provide web-based information for users in other languages.
- **General Promotional Materials:** translate into Spanish as budget permits or other Safe Harbor languages as required by issue or geographic area. Print "Free Language Assistance" on all promotional materials.
- **Construction, Detour and Other Courtesy Notices:** translate into Spanish when feasible and into other Safe Harbor languages as determined by analysis of location and marketing reach. Improve interdepartmental collaboration to allow sufficient time for translation.
- **Website Materials:** ensure that all web content is provided in a form that can be translated, so persons with LEP can access all information; new documents should be posted in a format that works with the Google Translate button or other online translation tools (i.e., uploaded in read-only original formatting instead of being scanned, or content provided as text in a webpage.) Remove English-only buttons that navigate to registration forms or important program related webpages.
- **Resource Guides and Materials:** develop Access Alameda Resource Guide or other User Guides in English and Spanish with options to provide in Safe Harbor languages as budget permits; incorporate greater use of illustrations and pictographs and include sources of additional information in multiple languages. Increase the

number of videos on social media, including "How to" videos aimed at non-English speakers, youth, seniors, new users in English with subtitles in Spanish and other languages as budget permits.

- **Social Media and Apps:** use social media apps geared towards language groups, such as WhatsApp for Chinese speakers and KakaoTalk (Katakalk) for Korean speakers.

Translation Tools and Protocols

- **Language Line Service:** initiate Language Line and publicize the use of the service via a "Free Translation Assistance" text block, including on the website, in all printed materials; promote availability to stakeholders and encourage its use by all employees and consultants. Train frontline employees on its use.
- **Line Item for Translation and Interpretation:** to ensure the translation requirements of the plan are met consistently across departments and projects, use budget account codes so that all Departments can budget and monitor translations and interpretation. Ensure that grant funded and/or Alameda CTC projects that include outreach or scoping efforts include translation and interpretation expenses to provide necessary translation assistance.
- **Public Hearing Protocol:** for all public hearings, provide Spanish interpreters; provide Safe Harbor interpreters upon request and advertise option in advance of the meeting in all Safe Harbor languages. The availability of interpreters should be promoted in the language of provided interpretation at the same time the agency is promoting the public hearing.
- **Board Meeting Protocol:** subject to availability, provide interpreters upon request with a 72-hour notice for all Safe Harbor languages; Language Assistance text box should be included in Board agendas and in native languages and in English.
- **Community Meetings Protocol:** For all community meetings and workshops, provide Spanish interpreters for at least one meeting within the outreach topic series; offer interpretation upon request for Safe Harbor languages. The availability of interpreters should be promoted in the language of provided interpretation at the same time the agency is promoting the community meetings.
- **"I Speak" Cards:** Produce and distribute to all employees "I speak" cards for emergency situations requiring language assistance. In conjunction with Language Line service, this will enable staff to quickly keep LEP users informed. Consider QR codes on cards that direct users to Language Line.
- **Digital Tools or Language Technology:** encourage employees to take initiative to use new technology (Google Translate or mobile apps) to communicate with persons who speak languages other than English.
- **Website Administration and Management:** Add all languages to the Google Translate function. Add "Free Language Assistance" with Language Line telephone number in all Safe Harbor languages to the top of the home page. Improve design and organization of website and mobile website to ensure LEP access. Ensure that all web content is provided in formats that can be used by modern online translation tools. Remove pictures with text that cannot be translated using Google Translate or other translation tools. Implement webpage protocols that will allow the use of Google Analytics to understand how persons who use the internet in languages other than English use the agency website.

Employees

- **New Employees** (and consultants): Include ability to speak another language as a desired qualification in hiring to take advantage of an existing resource.

- **Bilingual Employees:** Identify jobs where bilingual ability is required or desired; Identify other languages spoken by existing employees who can help with translation of documents or interpretation as needed and provide list of bilingual employees to front line staff.
- **Employee and Consultant Training:** hold Title VI and LEP training appropriate to the role, as part of all new-employee orientation (agency and consultant); conduct training for staff involved in planning and marketing of new activities and projects to integrate consideration of Title VI-protected populations into planning. Include training on the use of Language Line services for frontline staff.
- **"I Speak" Cards:** Distribute "I Speak" cards to outreach staff that includes the telephone number for LEP translations.
- **Employee Tuition Assistance:** Promote the availability of tuition-reimbursement for employees who learn any of the Safe Harbor Languages.

2.3 High Priority Strategies

Process and Protocols

One of the more important elements of a successful Language Assistance Plan is ensuring that employees know how to obtain language assistance for the LEP populations they encounter. Ad hoc methods of providing translations or interpretation services is useful, but it relies on each employee to have their own network of ad hoc advisors. And, translations or interpretation services should not be an afterthought that gets shoehorned into existing schedules.

In order to internalize providing language assistance measures into employees' day-to-day work flows, it's recommended that the current processes be strengthened into a formal process and protocol for obtaining translations, interpretive services or other language assistance measures so that employees understand their roles and responsibilities within that process. This should include identifying a single point of contact for developing and obtaining translated materials and interpretation services. This also includes identifying contracts, budgets and line items that will be used for language assistance measures, and developing processes to request translations for outreach materials.

Alameda CTC is ahead of the curve in an important respect: one primary consultant is currently responsible to secure formal translation and interpretation services with a designated budget. Additionally, the ad hoc methods that Alameda CTC employees also use for translations is both effective and cost-effective, and it should be worked into the protocol. However, because lead times vary for different language assistance measures, the process should recognize the need to allow either internal staff or the translation consultants enough time to provide a high-quality translation for printed media.

Alameda CTC uses consultant firms to provide a variety of project-specific work including outreach and public engagement. Alameda CTC will continue to monitor the outreach consultants to ensure that the goals and outcomes envisioned in the language assistance plan are transmitted to the consultant and monitored for adherence to the plan.

One tool that can be used is a [*Language Assistance Measures Request Form*](#) that can be tailored to meet the needs of the agency. It can identify when translations or interpretation services would be needed, geographic-specific information if available, whether the information would be printed, posted or delivered, the budget line item if applicable, and most importantly when the services, translations or other measures would be needed. This can even

be accomplished using online forms that can be submitted electronically to support virtual office needs. Many agencies have similar forms when submitting documents for printing jobs that could be altered for this purpose. However, in our virtual age, posting items on the website is just as important as printed collateral. As such, ensuring items are web-ready should also be a consideration.

An additional tool is the creation of a "Project Charter" that is undertaken at the conceptual stage of a project, that lays out general marketing needs associated with public scoping, outreach or gathering public comment. This way, general marketing needs can be discussed with the understanding that language assistance measures will be considered as part of the overall communication strategy. Many agencies have Project Charters, which also identify the time frame and milestones for the project, anticipated staff resources, project sign-offs and project team management. If scoping or outreach is involved, the staff responsible for the language assistance measures would have automatic signatory to the charter so that LEP considerations have been included.

Training Staff

Training staff on the protocols to provide language assistance and Title VI in general helps to ensure that employees understand the guidance and consider the needs of LEP individuals in the course of doing their job. This should include both staff that have direct contact with the public, in addition to those who may have responsibility for managing outreach processes. Once the agency has implemented a Language Line phone service for LEP callers, the frontline staff who answer public calls should also be trained in how to facilitate interpretations using the service. All employees should be provided general Title VI awareness training, or LEP-specific training to help them understand the agency's role in language assistance.

It is recommended that both general Title VI training and specific LAP training occur within the following framework:

- **New Employee Orientation (Title VI):** all new employees should be provided an overview of the agency's Title VI responsibilities, including general information about language assistance measures that the agency provides. When hired, employees/consultants that have public facing positions should be trained on understanding and interacting with diverse communities. They should be given specific skills for giving service to stakeholders with a variety of challenges that may require extra attention. In all cases, employees shall continue to practice appropriate responses to sensitive cases such as those involving non-English speaking stakeholders.
- **LEP Training:** All frontline employees (and consultants) should attend LEP related training, with specific emphasis on elements under their job description at least upon orientation. Frontline employee classifications will be selected based on their likelihood to come in contact with the public or be in departments that have broad community engagement activities, such as those related to Planning and Capital Projects. This will likely include marketing and communications staff, ADA/Paratransit Program Manager, SR2S Program Manager, and planning and capital projects staff; however, there may be other positions that would qualify and should undertake the training.

The training should be targeted to help the employees understand how to provide the language assistance measures should it be needed. This could include new tools, existing or new technology that is available, or methods to provide language assistance to ensure competency. This should also be job-specific so that participants will come away from the training with real world understanding of how to provide language assistance given Alameda CTC's tools and resources.

- **Refresher Training (Title VI):** Every year or so, staff should attend Title VI training with an additional emphasis on providing language assistance to address any questions that they may have regarding either encounters with LEP populations or how to provide language assistance. Training can be accomplished using methods such as video learning, PowerPoint presentations, or small group training so that the task associated with ongoing staff training does not become onerous to the agency. Training is especially helpful when demonstrating new technology that may be available for language assistance, or emerging demographic trends that may require consideration.

Providing Notice to LEP Persons of Language Assistance Measures

As the most far reaching and important aspect of language assistance, providing notice to the public on the available language assistance is crucial. Consequently, ensuring that informing the public of how to seek language assistance plays a substantial role in the LAP.

Web-based information took center stage during the pandemic, with most agencies using the web to provide documentation about COVID-19 protocols, meeting details or other crucial information. As a result, changes to the website are recommended to ensure that notices of free language assistance can be front and center in the visitors' website experience. To ensure that notification of language assistance is undertaken with a comprehensive view, there are number of recommendations that are being made to improve this practice. Additionally, it's crucial that all available languages are included in the Google Translate function instead of the abbreviated list currently in use.

One easy and effective method to provide notification of language assistance measures is to produce a text box with all the Safe Harbor languages that states "Free Language Assistance" with the Language Line number so that it can be used on all printed materials and in the digital realm such as the example, below. This should be used on Board agendas or on printed or web documents so that language assistance can be offered without having to translate and print each document.

Free language assistance | Asistencia gratis en su idioma | Libreng tulong para sa wika | 免費語言幫助
Hỗ trợ giúp thông dịch miễn phí | 무료 언어 지원 | शुल्क भाषा समर्थन | бесплатная языковая помощь

2.4 Vital Documents Guidelines

An effective Language Assistance Plan includes the translation of vital and other documents into the languages of frequently encountered LEP stakeholders.

According to federal guidance, vital written documents include, but are not limited to, consent and complaint forms; intake and application forms with the potential for important consequences; written notices of rights; notices of denials, losses, or decreases in benefits or services; and notices advising LEP individuals of free language assistance services.¹

¹ FTA Circular 4702.1B

Additionally, the Department of Justice (DOJ)² guidance indicates that the classification of a document as “vital” depends upon the importance of the program and/or information and the consequence to the LEP person if the related information is not provided accurately or in a timely manner. The determination of which documents are to be considered “vital” is left to the discretion of the agencies, who can evaluate the importance of these materials to their program or services along with the impact of translation on the LEP population.

Documents that may be considered “Vital” can include:

- Administrative complaints, release, or waiver forms;
- Claim or application forms;
- Public outreach or educational materials (including web-based materials);
- Written notices of rights, denial, loss, or decreases in benefits or services and associated public hearings;
- Forms or written materials related to individual rights, including eminent domain, land acquisition or other legal materials;
- Notices alerting the public to street closures, or roadway construction that may have safety impacts;
- Notices regarding the availability of language assistance services provided by the agency at no cost to LEP individuals;
- Certain consent orders, decrees, Memoranda of Agreement, or other types of pleadings or litigation materials.

Based on the Four-Factor analysis, the most frequently encountered languages have been broken down into the following three categories:

- Primary Languages: Spanish and Chinese (Mandarin and Cantonese)
- Secondary Languages: Vietnamese and Tagalog,
- “Safe Harbor” Languages for vital document translation in addition to those listed above: Korean, Punjabi, Hindi, Arabic, Persian (incl. Farsi, Dari), Telugu, Russian, Japanese, Tamil, Portuguese, Gujarati, Khmer, French, Urdu

Alameda CTC’s Definition of ‘Vital Documents’ and Level Priority

For purposes of determining Vital Document protocol, Alameda CTC defines “Vital Documents” as:

- 1) Any document that is essential for obtaining services and/or benefits that the Alameda CTC provides; and
- 2) Any document that is required by law, such as notification of Title VI benefits and Language Assistance.

A variety of factors influence whether an Alameda CTC document will be considered “Vital,” including issues such as time sensitivity or impact on legal rights of individuals. Additionally, while a document may be classified as Vital, Alameda CTC may elect to provide either a summary of relevant information or a verbal translation in lieu of a word for word translation, depending upon the consequences to the LEP population. Also, depending on the document, it

² Department of Justice Language Access Plan: March 2012

may be more cost effective to offer translation services by request so that translation costs can be managed. The decision to translate Vital and non-vital Documents will be weighed against available resources and staff capacity.

For purposes of providing guidance for document translation, Vital Documents have been classified into three levels based on the definition, above:

LEVEL 1: REQUIRED TRANSLATIONS

Most Level 1 documents will be translated into all languages without request by the LEP individual. Notification of available translations services will be noticed for Safe Harbor languages on certain documents where the target language is not known. These documents are those that would seriously impact access to Alameda CTC's programs or services by LEP populations if they were not translated. This includes those documents associated with a LEP individual's understanding of their legal rights, including those related to language assistance. They include:

- Notice to beneficiaries of protection under Title VI
- Title VI Complaint Form
- Notice of Free Language Assistance
- Legal Notices and/or letters to property owners associated with land acquisition or eminent domain
- Participation or "Intake" forms or notices for special programs or promotional events where financial remuneration is involved
- Legal Notices and Public Hearing Notices associated with environmental clearance of capital projects or planning processes

LEVEL 2: DESIRED TRANSLATIONS

Level 2 translations include those that would facilitate participation of LEP individuals in Alameda CTC's programs and/or services. Alameda CTC would translate these types of materials upon request, or provide translation or interpretation services if desired. Alameda CTC may translate these materials into the primary and secondary languages without request at their discretion based on available resources and/or importance of the material. These items may include translations into targeted languages depending on the location. These include:

- General information
- Meeting announcements, agenda packets or other meeting materials
- Construction notices related to Alameda CTC-sponsored projects
- Promotional materials related to meetings or activities where participation of LEP populations is crucial

LEVEL 3: ENHANCED TRANSLATIONS

Level 3 translations are those that would help LEP populations participate in the planning efforts that are undertaken by Alameda CTC. Translation of these documents will occur upon request; either in whole or in part. However, Alameda CTC may translate some of these documents without request if they are determined to facilitate participation of LEP populations based on available funding. These documents may include:

- Information about specific planning studies, long-range plans or planning activities

- Countywide plans or investment plans that are being considered by Alameda CTC
- Environmental Impact Reports or other related studies (in whole or in part) and legal notices announcing associated public comment periods

Alameda CTC reserves the right to translate documents into more languages as circumstances dictate and resources allow. For example, outreach to Communities of Concern in the Countywide Transportation Plan and modal plans efforts may provide translated meeting notices in languages other than Spanish and Chinese, depending on the area and particular concentrations of LEP individuals.

Table 11 below provides a list of example documents and categories of documents, and identifies the language category into which they should be translated. In all cases, Alameda CTC may provide a summary of a vital document and/or a notice of availability of free language assistance in the “Safe Harbor” languages, rather than a word-for-word translation of the vital document.

Table 10: Vital Document Levels

Document	Languages	Level
Title VI Public Notice	All Safe Harbor Languages	Level 1
Title VI Complaint Form and Procedures	All Safe Harbor Languages	Level 1
Notice of Free Language Assistance	All Safe Harbor Languages	Level 1
Letters/Notices of land acquisition	Primary and Secondary language, written notice that other languages will be translated upon request in all safe harbor languages	Level 1
Legal Notices	Primary and Secondary language, written notice that other languages will be translated upon request in all safe harbor languages	Level 1
Intake Forms	All Safe Harbor Languages	Level 1
General Promotional Materials	Primary and Secondary Languages (or others) as funding permits	Level 2
Meeting Announcements	Primary and Secondary Languages (or others) as funding permits	Level 2
Construction Notices	As determined by location	Level 2
General Agency Information	Upon request only	Level 3
Countywide Plans	Upon request only	Level 3
Environmental Reports	Upon request only with written notice that document will be translated upon request in all safe harbor languages	Level 3

2.5 Monitoring and Updating the Plan

Monitoring the LAP is an important element of keeping the plan not only up to date but relevant to the population being served. New immigrant populations with languages that were not originally identified in the Four Factor Analysis may require additional consideration in the LAP. On an ongoing basis, Alameda CTC will monitor activities and information that require LEP accessibility, including data collection and continued LEP plan assessment, to ensure that the Language Assistance Plan meets the changing needs of LEP populations. An annual review of the plan would ensure that methods of outreach and communication consider small and large changes associated with the languages being requested for language assistance or to address changes in the most effective means of communicating.

Monitoring methods include:

- Tracking requests for language assistance, translation services or written translations to refine future language assistance measures
- Review both **existing** and **new** stakeholder outreach materials prior to production to determine whether the document can be considered “vital” and what translation is needed.
- Evaluate and analyze outreach efforts pertaining to LEP populations.
- Review translation and language assistance efforts to determine whether they are adequate and/or effective.
- Analyze demographic data from the U.S. Census, the ACS, and any future Customer Surveys.
- Gather information from CBOs and regional agencies and partners through ongoing coordination
- Gather feedback from LEP stakeholders (public outreach, CBO meetings, etc.) and from staff and consultants

Additionally, new technology changes our understanding of the best methods to use in establishing a comprehensive approach to language assistance. For example, smart phones were not as prevalent in prior years, and translation applications were not as commonplace. Social media applications like Facebook Live, YouTube Live are more recent advancements to public engagement that have changed the landscape of communication. We have also seen LEP populations move away from receiving information in more historically standard formats (print, radio, TV) and opt for more app-based communications. All of these changes would not have been considered without a comprehensive review of the plan.

It is also important to monitor the language assistance measures periodically, along with how well the outreach activities are engaging LEP populations, so that if mid-course corrections are needed, they can be accomplished within the framework of the overall language assistance plan. Keeping track of subtle changes in how LEP populations are engaging in outreach activities may also help understand new methods of assistance.

This includes providing an opportunity for staff to provide feedback on the plan and the language assistance measures that may not be as effective. Informal “brown bag” sessions can provide an inviting forum that may encourage staff to become LEP experts and problem solvers for this serious concern. Community members and Community Based Organizations may also play a role in the continual monitoring of the language assistance measures, as the broader community can often understand the issue in ways that the agency may not.

Informal focus groups can also be employed to help identify what language skills employees might have, how they might be able to employ them, and what activities they might best enjoy or be good at. These focus groups could include the general staff as well as job-specific staff as a way to further the LAP practice without significant cost.

Additionally, while the LAP provides guidance for how to approach LEP considerations in establishing new outreach efforts, staff needs to be responsive to the community's needs in providing language assistance. This may include a targeted outreach approach that reviews demographic changes in the area to anticipate language assistance needs.

Appendix A: Survey Instruments

Alameda CTC Staff and Consultants: Title VI Survey

Thank you for participating in this short survey. Your feedback is extremely valuable to Alameda CTC's effort to provide better service to our community who may have limited ability to communicate in English, or "Limited English Proficiency" (LEP). Collecting this information will help us develop a Language Assistance Plan for LEP populations. This survey is being filled out by Alameda CTC staff and project/program consultants to inform internal efforts moving forward.

We are asking a variety of questions about interactions the public and stakeholders have with Alameda CTC and barriers that might be encountered when accessing Alameda CTC services, or participating in programs, planning efforts, and/or funding and programming decisions.

1. Which department do you work in? Or which project, program, or planning effort do you work on? _____

2. Are you?
 - Employee of Alameda CTC
 - Consultant with Alameda CTC

3. Other than English, which languages do you speak, read or write? Please select the language(s)
 - Spanish
 - Mandarin
 - Cantonese
 - Vietnamese
 - Korean
 - Hindi
 - Punjabi
 - Gujarati
 - Tagalog
 - Portuguese
 - Russian
 - Arabic
 - None
 - Other _____

4. If yes to #3, how fluently do you speak that language?
 - Fluent
 - Proficient
 - Somewhat proficient
 - Not applicable

5. If yes to #3, how fluently do you read/write in that language?
- Fluent
 - Proficient
 - Somewhat proficient
 - Not applicable
6. If yes to #3, and you speak, read or write in multiple languages, please elaborate on how fluently you speak, read or write in those languages. Please indicate "not applicable" if this does not apply to you.
- _____
7. In a typical month, how many members of the public do you encounter via e-mail, by phone, in person or via virtual meetings? Please give your best guess as a number. _____
8. Of these, how many of these members of the public would you say are unable to communicate well in English? Please give your best guess as a number. _____
9. Within a typical month, how often do you usually encounter members of the public who are seeking language assistance and are unable to communicate well in English? Please select one.
- More than 3 per day
 - 1-3 per day
 - 1-3 per week
 - 1-2 per month
 - Never
10. What information are those members of the public usually seeking? Please select all that apply.
- Planning Studies
 - Capital projects
 - Funding Inquiries
 - Traffic incidents
 - Sound walls
 - Website
 - Paratransit Services
 - Commission/Committee Inquiries
 - Title VI Inquiries or complaints
 - Discrimination
 - Express lanes and toll violations
 - Public Information
 - ADA/Accessibility for the Disabled
 - Safe Routes to Schools Program

- Student Transit Pass Program
- Public meetings (such as Board meetings, providing public comment, open houses etc.)
- Other_____

11. What are the top 5 languages you hear most often by members of the public you encounter?

- Spanish
- Mandarin
- Cantonese
- Vietnamese
- Korean
- Hindi
- Punjabi
- Gujarati
- Tagalog
- Portuguese
- Russian
- Arabic
- None
- Other_____

12. Have you needed to provide language assistance or translation services at Alameda CTC to be responsive to a member of the public? If so, please describe the type of assistance that was requested and how that assistance was provided.

13. Did you find those services helpful? Is there anything that could be done to improve those services?

14. Are there any resources you need to assist you in communicating with members of the public? Please use the space below for suggestions to improve Alameda CTC's communication or for any other comments you may have. If you have a specific language in mind, please include.

15. Full Name (Optional in case there are follow up questions)

Alameda CTC Title VI Survey for Community-Based Organizations

The mission of the Alameda County Transportation Commission (Alameda CTC) is to plan, fund and deliver transportation programs and projects that expand access and improve mobility to foster a vibrant and livable Alameda County. Alameda CTC is in the process of completing a Limited English Proficiency Plan (LEP) to establish a Language Assistance Plan (LAP).

We are asking a variety of people questions about interactions with Alameda CTC and barriers that might be encountered when accessing Alameda CTC services and programs. Since your organization advocates for or provides services to precisely the population Alameda CTC is striving to improve its communication, outreach, and services to, we would like to ask you to take 10 to 15 minutes of your time to provide your ideas about the needs of the community you serve and how Alameda CTC can best serve that community.

Thank you for giving us your input.

1. Does your agency or organization cover a specific geographic area?
 Yes Tri City Area - Union City, Newark and Fremont but anyone from anywhere can use our Centers.
 No

2. What neighborhood, city or county do you serve?

3. About how many people does your agency or organization provide services to or advocate on behalf of each year?

4. What countries does the population you serve identify with?

5. What are the five primary languages spoken by the population you serve?
 Spanish
 Mandarin
 Cantonese
 Vietnamese
 Korean
 Hindi
 Punjabi
 Gujarati
 Tagalog
 Portuguese
 Russian

- Arabic
- Other_____

6. For which languages do you typically provide translation or interpretation services to provide information to your community?

- Spanish
- Mandarin
- Cantonese
- Vietnamese
- Korean
- Hindi
- Punjabi
- Gujarati
- Tagalog
- Portuguese
- Russian
- Arabic
- Other_____

7. For which languages do you use interpreters when hosting live or virtual events with your community?

- Spanish
- Mandarin
- Cantonese
- Vietnamese
- Korean
- Hindi
- Punjabi
- Gujarati
- Tagalog
- Portuguese
- Russian
- Arabic
- Other_____

8. What age groups do you serve?

- Youth (under age of 17)

- Adults (18-64)
- Seniors (65 and older)
- All Ages

9. How would you assess the literacy level of the population you serve in their native language? In other words, how well can they read in their native language?

- Below basic
- Basic
- Below Basic
- Intermediate
- Proficient

10. How well do they read in English?

- Below basic
- Basic
- Below Basic
- Intermediate
- Proficient

11. What is the preferred method of communication for your community? How do you distribute information to your community?

- Email
- Newsletters
- Social Media (Facebook, Twitter, Instagram, etc.)
- Print Media
- Radio
- TV
- Text
- WhatsApp
- In person

12. To what degree does your population rely on Alameda CTC's programs and services (such as Safe Routes to Schools, other bicycle and pedestrian projects, paratransit (senior and disabled) programs, the Guaranteed Ride Home program, etc.)? Would you say they rely on the programs and services:

- A great deal
- Some

- Very little
- Not at all

13. What difficulties does this population have in using Alameda CTC's programs and services? (Please be as specific as possible.)

14. What is the best way to obtain input from your population in order to better serve them? (Please be as specific as possible.)

15. What are three things you think this population needs from Alameda CTC to be better served? (Please be as specific as possible.)

16. What suggestions, if any, do you have for Alameda CTC when it comes to communicating with your population? (Please be as specific as possible.)

17. Would you be willing to talk with us in greater detail about your answers? If so, please provide your contact information below. Please include name, organization, e-mail address, and phone number.

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Appendix B: Language Assistance Plan Recommendations

CATEGORY	ACTIVITY
General	
Title VI Internal Awareness and Training	Expand Title VI awareness into all activities and the general knowledge base of the agency, including the need for and methods of providing Language Assistance.
Public Engagement Needs and Strategies	Formalize internal interdepartmental public engagement activities by developing a public engagement strategy, and writing internal documents to clearly define protocols and procedures, including roles and responsibilities, for all departments that interact with public, including incorporating Language Assistance measures.
Project Charter	Develop a process to ensure that project team members are aware and have addressed Title VI and/or LAP issues. Create form or protocol that project manager must submit to ensure that risks associated with Title VI and/or LAP are recognized and addressed, to be approved by Title VI/ Language Assistance staff prior to implementation and approval of project.
Demographic Analysis of New Project Areas	Develop protocol that considers the attributes of the people in the geography of the new project (i.e., primary languages spoken, minority and income status) and include strategies to reach those constituents, to be approved by Title VI staff.
Implement Language Line Phone Service	Establish Language Line phone services to promote easily accessed language assistance and interpretation. Create text block promoting Language Line services to be included in all printed documentation.
Eliminate English-only Campaigns	When creating future promotional/marketing/awareness campaigns, include communications in Spanish and other languages as appropriate, and the "Free Language Assistance" text, at a minimum, to ensure participation beyond English proficient users. Consider establishing QR code for language assistance and translation information
Engagement and Communication with Community Based Organizations	Through partnerships with community organizations, governmental and other agencies, continue to expand the community outreach database and identify best practices for communicating and working with CBOs, including those whose members may need language assistance.

CATEGORY	ACTIVITY
Develop relationships with CBOs	Continue to develop ongoing partnerships for future planning activities; communicate with CBOs the new activities undertaken following project implementation (i.e., Language Assistance Hotline, "How to Ride" videos and brochures, etc.); survey CBOs after projects for feedback to assess and improve communication methods.
Contract Compliance	Ensure that contracts contain language that includes requirements to provide public information that complies with Title VI LEP guidance. Provide Language Assistance Plan with all solicitations.
Materials and Documents	
Title VI Public Notice (Vital Document)	Provide notice in all Safe Harbor languages, with "Free Language Assistance" text block in all Safe Harbor languages at posted locations such as in the Commission's primary meeting space the Mary V. King Conference Room, General Offices lobby, or any space where users may be alerted; provide translations on the website.
Title VI Complaint Form and Procedures (Vital Document)	Translate into all Safe Harbor languages on website and in printed form available on request.
Notice of Free Language Assistance (Vital Document)	Provide notice of Free Language Assistance text block in all Safe Harbor languages on masthead of website. Include Free Language Assistance text block where possible on all written and digital materials, including Board meeting agendas and public hearing notices. Notice of language assistance should be posted at Commission conference room, General Offices lobby, or wherever members of the public may congregate.
Legal Notices (Vital Document)	Offer translation in all Safe Harbor languages upon request.
Registration Forms (Vital Document)	Make all registration forms on the website translatable by Google Translate or other translation tools; for printed materials, translate document into Spanish, and insert "Free Language Assistance" with telephone number in all Safe Harbor languages
Safety and Security Info	Use of pictographs as much as possible. Consider QR Codes to obtain translations or language assistance

CATEGORY	ACTIVITY
General Promotional Materials	Translate into Spanish as budget permits or as required by issue and into other Safe Harbor languages as determined by demographic analysis of location or marketing reach.
Construction, Detour, and Other Courtesy Notices	Translate into Spanish when feasible and into other Safe Harbor languages as determined by analysis of location and marketing reach. Improve interdepartmental collaboration to allow sufficient time for translation.
Website Materials	Ensure that all web content is provided in a form that can be translated, so persons with LEP can access all information; new documents should be posted in a format that works with the Google Translate button or other online translation tools, i.e. uploaded in read-only original formatting instead of being scanned, or content provided as text in a webpage. Remove English only buttons that navigate to registration forms or important program related pages.
User Guides and Materials	Develop Alameda Access Guide or other user guides in English and Spanish with options to provide in Safe Harbor languages as budget permits; incorporate greater use of illustrations and pictographs and include sources of additional information in multiple languages. Increase the number of videos on social media, including "How to Ride" videos aimed at non-English speakers, youth, seniors, new users in English with subtitles in Spanish and other languages as budget permits.
Translation Tools & Protocols	
Language Line Service	Initiate Language Line and publicize the use of the service via a "Free Translation Assistance" text block, including on the website, in all printed materials and on the buses; promote availability to community and encourage its use by all employees.
Line Item for Translation and Interpretation	To ensure the translation requirements of the plan are met consistently across departments and projects, use of budget account code so that all Departments can budget and monitor translations and interpretation. Ensure that grant funded and/or Alameda CTC projects that include outreach or scoping efforts include translations expenses to provide necessary translation assistance.

CATEGORY	ACTIVITY
Public Hearing Protocol	For all public hearings, provide Spanish interpreters; provide Safe Harbor interpreters upon request and advertise option in advance of the meeting in all Safe Harbor languages. The availability of interpreters should be promoted in the language of provided interpretation at the same time the Agency is promoting the public hearing.
Board Meeting Protocol	Subject to availability, provide interpreters upon request with 72-hour notice. Notice of Language Assistance text box should be included in Board agendas and in native languages and in English.
Community Meetings Protocol	For all community meetings and workshops, provide Spanish interpreters for at least one meeting within the outreach topic series; offer interpretation upon request for Safe Harbor languages. The availability of interpreters should be promoted in the language of provided interpretation at the same time the Agency is promoting the community meetings.
"I Speak" Cards	Produce and distribute to all employees "I speak" cards for emergency situations requiring language assistance. In conjunction with Language Line service, this will enable staff to quickly keep LEP users informed. Consider QR codes on cards that direct users to Language Line.
Digital Tools or Language Technology	Encourage all employees to use individual initiative to use new technology (such as Google Translate or mobile apps) to communicate with persons who speak languages other than English.
Website Administration and Management	Add all languages to the Google Translate function. Add "Free Language Assistance" with Language Line telephone number in all Safe Harbor languages to the top of the webpage. Improve design and organization of website and mobile website to ensure LEP access. Ensure that all web content is provided in formats that can be used by modern online translations tools. Remove pictures with text that cannot be translated using Google Translate or other translation tools. Implement webpage protocols that will allow the use of Google Analytics to understand how persons who use the internet in languages other than English use the Agency website.

CATEGORY	ACTIVITY
Employees (including contractors)	
New Employees	Include as a desired skill in all new hiring, regardless of position, the ability to speak multiple languages.
Bilingual Employees	Identify jobs where bilingual ability is required or desired. Identify other languages spoken by existing employees who can help with translation of documents or interpretation as needed and provide list of bilingual employees to front line staff.
Employee Training	Include Title VI and LEP training appropriate to the role, as part of all new-employee orientation (agency and contractor), contractor bid materials, including LEP-relevant content. Conduct training for staff involved in planning and marketing of new activities and projects to integrate consideration of Title VI-protected populations into planning.
"I Speak" Cards	Create and distribute "I speak..." cards to outreach staff that includes the telephone number for LEP translations. Consider QR codes on cards that direct users to Language Line.
Employee Tuition Assistance	Promote the availability of tuition-reimbursement funds to all employees and encourage them to learn the Safe Harbor languages in the service area.
CBO Recommendations	
Engagement and Communication with Community Based Organizations	Have Alameda CTC act as portal for translating written forms from non-English to English for each city within its jurisdiction.
	Confirm Alameda Access Guide programs and phone numbers are up to date since Covid changes.
	Share proactively resources and services available. Provide information on program availability, requirements and benefits.
	Utilize social media apps to provide information about Alameda CTC programs in LEP languages: WhatsApp for Chinese American community

CATEGORY	ACTIVITY
	and KakaoTalk (Katakalk) for Korean American community. Ninety-percent of both communities use these apps.
	Offer financial discounts.
	Build partnerships with agencies serving LEP populations so that Alameda CTC is out in the community and visible and information is getting out to LEP persons from a trusted source.
	Provide all materials and collateral in LEP's population's language of choice.
	Hire staff that speaks Safe Harbor languages.

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