

**Request for Qualifications (RFQ)
for Language Plan Assistance,
dated August 3, 2012**

Proposers' Submitted Questions and Answers

August 23, 2012

- Q1: Does MTC have translation services or consultants available for the work under this RFQ, since the budget does not appear to accommodate such services?
- A1: **The budget for this project does not include funds for translation services, because the scope of work for this project does not require translation services.**
- Q2: In the section describing proposal response requirements, can Proposers combine items #3 and #5 (project descriptions and references) if the references match the projects described in item #3??
- A2: **No.**
- Q3: In MTC's previous Language Assistance Plan, there is no indication that any surveys of users were done. Were any surveys completed? With whom?
- A3: **For the current LAP, MTC conducted two focus groups in partnership with community-based organizations (CBO) that serve Limited English Proficient (LEP) clients (the Spanish Speaking Citizens' Foundation in Oakland and the Chinatown Community Development Corp. in San Francisco). Please see the attached memo Legislation Committee memo, dated September 3, 2010, for more information on the process.**
- Q4: Are you expecting to use the MTC Factor 1 analysis from 2010 or will MTC update the 2010 Factor 1 analysis using internal staff? If you do intend to use the 2010 Factor 1 analysis, can you identify whether you segmented the data based on geographic location? Also, are maps available for the 2010 Factor 1 analysis that segments the data by geography?
- A4: **MTC does not intend to update Factor 1 at this time. Data were segmented by county. Maps are not currently available, but MTC may develop these maps for the updated analysis if required.**
- Q5: While the period of performance for the consultant contract will be completed by June 30, 2013, what is the actual timeline for completing the LAP (both including optional task 5 as well as without), given that the deadline for corrective actions appears to have passed?
- A5: **MTC has committed to completing factors 2, 3 and 4 and revising our language assistance plan by May 2013.**
- Q6: Once the work is complete, will MTC be seeking input on the LAP or is it envisioned that the consultant will be tasked for that work?

- A6: MTC will be seeking public input on the revised language assistance plan. MTC staff will be responsible for that work.**
- Q7: Will it be the responsibility of the vendor to consider integrating the LAP with the public participation plan or will MTC staff be undertaking that work?
- A7: MTC staff will undertake that work if it is required.**
- Q8: Are there current mechanisms to survey MTC staff and contractors of the programs that MTC administers (Clipper, 511.org, etc.)?
- A8: MTC staff may be surveyed via web, email, phone or face to face, under the direction of the project manager.**
- Q9: Is MTC's response to the FTA compliance review available to review in order to better understand the commitments and timelines for the LAP?
- A9: MTC's response to the FTA compliance review is now posted on the MTC website along with the RFQ.**
- Q10: Is \$55,000 intended to complete Factors 2, 3 and 4 for the entire 9 county bay area?
- A10: Yes.**
- Q11: Based on the budget, it does not appear to include focus groups for LEP groups or individuals. Can vendors propose these types of strategies as optional tasks?
- A11: The budget for this project includes funds for all required analysis for tasks 1, 2, 3 and 4, including focus groups, etc.**



METROPOLITAN
TRANSPORTATION
COMMISSION

Agenda Item 3a

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Memorandum

TO: Legislation Committee

DATE: September 3, 2010

FR: Executive Director

W. I. 1112

RE: Final Draft Plan for Special Language Services to Limited English Proficient Populations

Background

Executive Order 13166 signed by President Clinton requires federal agencies to implement measures to ensure that people who speak limited English have meaningful access to federally conducted and federally funded programs and activities, consistent with Title VI of the Civil Rights Act of 1964. Both the U.S. Department of Transportation and the Federal Transit Administration have implemented guidance or directives in furtherance of Executive Order 13166. In June, the Legislation Committee released for public review and comment a Draft Plan detailing procedures that MTC takes to assist persons with limited proficiency of the English language.

MTC's Draft Plan for Special Language Services to Limited English Proficient (LEP) Populations documented the various services and procedures that MTC has in place to assist Bay Area residents. This Draft — available in Spanish and Chinese, as well as English — was circulated throughout the region. Two community-based organizations who serve LEP clients (San Francisco's Chinatown Community Development Corporation and Oakland's Spanish Speaking Citizens Foundation) assisted staff in conducting focus groups with residents with limited English proficiency. Display ads were published in two Spanish and one Chinese language newspapers alerting residents about the availability of the Draft Plan, and staff publicized the opportunity to comment via the web, e-mail alerts and through a presentation to MTC's Policy Advisory Council.

Key Comments Heard

MTC received a total of six written comments on the Draft Plan (see Attachment 1), and answered several questions about the draft. Attachment 1 also lists oral comments we received at presentations or at the focus groups. Key points heard:

1. When seeking to involve LEP populations throughout the nine Bay Area counties, MTC should tailor translations as appropriate by county — for example, translating materials or presentations into Vietnamese when seeking comments in Santa Clara County.
2. Clear, visible signage to the region's transit network is a basic need for LEP persons and should be the first step taken.
3. MTC should utilize social media networks to reach younger family members who are often their families' informal translators.
4. MTC should avoid overly complex or technical terms and write in a style tailored to a general audience.

5. Comments confirmed limited access to Internet by LEP persons; high dependence on television and radio for news; and the importance of working with community partners.

Modifications to Draft Plan

Based on our “Determination of Need” explained in the Draft Plan, MTC at a minimum commits to the translation of vital documents into Spanish and Chinese — including certain news releases, brochures, fact sheets and portions of the long-range regional transportation plan. Based on comments received, we have modified the Final Draft Plan to clarify that MTC does tailor county-based public participation activities to reflect the unique LEP population in each county. For major planning efforts, MTC seeks to partner with community groups who can assist us in tailoring presentations and meeting materials to meet the language needs of local participants. Additionally, we have modified the Plan to clarify the importance of writing in clear, compelling language in a style appropriate to the audience. The two focus group sessions told us that LEP persons are more likely to get their news from television rather than newspapers; we modified the general measures/practices in the plan to reflect this point.

In the attached Final Draft Plan for Special Language Services to Limited English Proficient (LEP) Populations (see Attachment 2), additions are shown in italics and deletions are shown in strike-out text.

Recommendation

Staff recommends forwarding the Final Draft Plan for Special Language Services to Limited English Proficient (LEP) Populations to the full Commission for approval.



Steve Heminger

Attachments

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**Summary of Comments and Responses to
MTC's Draft Plan for Assisting Limited English Proficient Populations**

COMMENTS	RESPONSE
<p>#1 — E-mail comment (John Inks)</p> <p>Mexico and China don't offer English language assistance to English speaking immigrants and aliens. English is the language of the U.S.</p>	<p>MTC has developed this plan in response to federal requirements for improving access to government services among people with limited English language abilities. More importantly, the Commission is committed to providing meaningful access to all MTC programs and activities to all residents of the Bay Area.</p>
<p>#2 — E-mail comment (Linda M. Jackson, Principal Planner, City of San Rafael)</p> <p>Looking only at the county statistics reminds me of the forest and the trees. The county percentages miss the unique, nearly 100% mono-linguistic non-English communities embedded within each county.</p> <p>And, the emphasis on Spanish and Chinese downplays the fluidity of the nature of immigration, when, for example, we'll likely be seeing an increase in the number of immigrants from the middle east and Afghanistan area. The day may come when Spanish and Chinese will seem outdated! A great source for finding out who is speaking what, especially towards the end of a decade when the census data may be outdated, are the local schools. What languages are the children speaking?</p> <p>Good work at putting together a basic outline of things to be aware of when working in immigrant communities.</p>	<p>We acknowledge the ever-changing demographics in our very diverse, multi-cultural Bay Area. MTC's LEP Plan will be reviewed and updated to reflect significant changes in advance of each update of the Regional Transportation Plan.</p>

COMMENTS	RESPONSE
<p>#3 — E-mail comment (Carolyn Linnard)</p> <p>The first step in helping people with limited English skills would be insisting that transit agencies improve their existing English signs. Even English speaking visitors have trouble managing the BART system where the station signs are sometimes too small, often in inadequate size print, seldom well lighted. The ability to read the signs is additionally limited by dirty windows. Hopefully the train operator is instructed to announce the station stops, but he does not always do that. He may say the destination of the train, but not tell the name of the adjacent station. In addition, often the public address system does not work or is not audible.</p> <p>Even a non-English speaking person can learn the name of the station he needs, but if he cannot <u>see</u> or <u>hear</u> the names of the stations he passes, how is he to find the one he needs? This is basic and needs to be corrected before you worry about a Plan for Assisting Limited English Proficient Populations.</p>	<p>MTC shares your concern on the importance of clear, visible signage to the region's transit network. MTC has in place a Regional Transit Hub Signage Program and is working with transit operators to improve the information that guides and directs the public from one transit system to another, including schedule and transfer information. Way-finding and transit information signs intentionally rely on universal icons/pictographs to bridge language barriers.</p>
<p>#4 — E-mail comment (Alameda County Paratransit Coordinator, ACTC)</p> <p>Overall I think this is a great step towards making MTC's services more accessible to all residents of the Bay Area and I'm happy that this is a long term vision that will continue to expand as the population in the Bay Area continues to change.</p> <p>1. In the section, <i>Factor 1: Number and proportion of LEP persons served or encountered</i>, it breaks down the 5 most frequent spoken languages, are there any efforts to acknowledge the other smaller percentage of communities that speak languages other than Spanish and Chinese in the long term? Although theoretically 1.5 or 1.2% (for spoken languages Vietnamese and Tagalog, respectively) may seem very marginal in numbers the needs of these communities may actually be a lot greater. At outreaches I've had several individuals, both consumers and providers, suggest that we print our Access Alameda Guides in Korean.</p> <p>2. Under General Measures or Practices, there is a bullet point about seeking "consultation with MTC's Policy Advisory Council and to seek representatives from communities of color and low-income communities." How will the selection process and eventually the advisory council equitably represent these diverse communities?</p>	<p>See point by point response below:</p> <p>1. MTC does reach out to communities that speak a range of languages. We have conducted meetings with Vietnamese and Lao translators in attendance, for example. For major planning efforts, we seek to partner with community groups who can assist us in tailoring presentations and meeting materials to the needs of participants. We will often provide funding for such assistance. We work to overcome barriers to participation in low-income communities and communities of color, including language barriers.</p> <p>2. MTC Commissioners make appointments to the Policy Advisory Council. Nine of the 27 seats on the Council are set aside for representatives from communities of color as well as individuals familiar with issues affecting low-income communities or environmental justice. MTC widely distributes the call for applicants, using</p>

COMMENTS	RESPONSE
<p>3. Under Local Community Media, I would suggest utilizing social media outlets (with discretion of course) as many younger family members have access to social media networks such as Facebook and Twitter and are usually their households’ informal translators.</p> <p>4. Under Work with Advocates of LEP Persons, I would also suggest doing targeted outreach to ethnic-enclaves such as Chinatown, Manilatown and other ethnic community spaces that have large concentrations of people that speak these specific languages. I would also suggest focusing on increasing signage visibility of these particular languages in these areas as they are more or less located in or around high usage public transit areas.</p> <p>5. In the Staff Training section under Routine Accommodations, what does the “awareness of and sensitivity to the needs of LEP residents” actually look like in practice? Is there a cultural sensitivity or cultural competency curriculum that is implemented? If so, what does it look like?</p>	<p>news releases and mailing of a postcard. Information about the selection and appointment process can be found at MTC’s web site: http://www.mtc.ca.gov/get_involved/advisory/</p> <p>3. You encourage MTC to utilize social media outlets as appropriate, given that many younger family members have access to social media networks such as Facebook and Twitter and are usually their households’ informal translators. MTC has launched a presence, albeit limited thus far, in both these new media outlets as a way to keep interested residents informed, and we will be evaluating the expanded use of social media</p> <p>4. Indeed, MTC partners with community groups in such areas (described under item 1) to implement these measures.</p> <p>5. We have tailored staff training to make sure staff are aware of the needs of low-literacy populations. As one example, we encourage staff, as appropriate, to begin a dialogue versus waiting for a participant to read materials that are on display.</p>

COMMENTS	RESPONSE
<p>#5 — David Schonbrunn</p> <p>We have downloaded the draft plan and have put it through the paces of Flesch, an application that is “designed to quickly analyze a document and display the difficulty associated with comprehending it.”</p> <p>The Flesch–Kincaid Grade Level for MTC’s Draft LEP Plan came out at 15.59, and the Flesch Reading Ease Level was scored at 24.88. These figures are only estimations, but they indicate the document is difficult. The Grade Level score of over 15 and a half means the reader would need to have reached a grade level somewhere between junior and senior in college. The reading ease figure of 24.88 is also indicative of complexity; the higher the number means the easier a document is to read. Wiki states that Reader’s Digest has a readability score of 65, Time Magazine comes in at 52 and the Harvard Law Review scores in the low 30s. In other words, the Draft is less readable than the Harvard Law Review. Wiki also notes “many government agencies require documents or forms to meet specific readability levels,” and that “Florida requires that life insurance policies have a Flesch Reading Ease score of 45 or greater.”</p> <p>These scores are an indication that the Plan is not intended to be read by the very people whose needs it is allegedly addressing. That in turn is an indication that MTC is not seeking to involve the people who would be affected by this Plan in its development process. That is a violation of the Environmental Justice Principles adopted by the Commission. TRANSDEF encourages MTC to prepare a version of the LEP Plan that is easily readable by Bay Area residents with Limited English Proficiency, as well as equally readable versions in the other languages covered by the Plan.</p> <p>Currently out also for comment is MTC’s Draft 2010 Public Participation Plan. The MTC home page asks about the Participation Plan, “How can we get more people engaged in shaping transportation policies?” Having a LEP Plan that persons with limited English proficiency are able to understand would be a good start.</p>	<p>You noted that draft document is not written in a style that would be readily accessible to the Bay Area population at large and that government agencies too often issue documents in a language and a style that is overly complex and off-putting to readers. This draft plan is intended to detail the various ways MTC works to serve the needs of Bay Area residents who are limited English proficient. We are working to provide translated web content and provide simple, concise instructions on how to request translation services, both on the web and at our meetings.</p>

COMMENTS	RESPONSE
<p>#6 — E-mail comment (Ying Smith)</p> <p>Thank you for distributing the Draft Plan for comments. I finished reading the draft plan, English version only so far, and would like to share my thoughts. I would like to share with you some information I found a few years ago and VTA's work in this area. I can't tell whether Table 1 on Page 3 has quite the right information to illustrate your point. If you can take a look at the information and compare that will be great.</p> <p>We found working with the LEP population is both important and challenging. We can all benefit from each other's experience. Hope the information is useful for you.</p>	<p>Thank you for the data compiled by the Asian and Pacific Islander American Health Forum, as well as the VTA data you sent concerning Limited English Proficient populations. The data are very similar to the Census data shown in Table 1 of MTC's plan. We appreciate the opportunity to compare information as we move forward to improve access to MTC's plans, programs and services to the diverse Bay Area population.</p>

**Summary Comments From
MTC's Policy Advisory Council
July 14, 2010**

Randi Kinman: What would really help Santa Clara County is to have material in Vietnamese. She would like to see MTC standardize all of its outreach to include Vietnamese for Santa Clara County.

Rich Hedges: He is involved with the Vietnamese community in San Mateo County through another volunteer effort and agrees that material should be translated into Vietnamese. Many are low income and do not read English.

**Summary Comments From
Focus Group with 18 Cantonese Speakers
San Francisco Chinatown (July 21, 2010)
Hosted by the Chinatown Community Development Corporation**

Regarding Translation Process at Meetings:

- About 1/3 prefer simultaneous translation w/ headsets (must have *functional* headsets)
- About 2/3 prefer delayed translation with a live person
- A presentation entirely in Cantonese, however, is preferable to everyone.
- Positive points about meetings with translators:
 - able to understand everything as it happens
 - able to respond appropriately when you understand the specifics of the meeting
 - able to communicate with other people and tell them *our* opinion
 - good to have dialogue between people of different backgrounds and languages
- Negative points about meetings with translators:
 - some people can't hear the translations
 - doesn't work without an accurate translator
 - also, people might not respond well if the interpreter isn't sensitive

What would draw you to a meeting/event about transportation issues?

- An interesting meeting topic
- To learn about a new service or program
(want to learn about other issues like services, welfare, benefits, health care, housing, topics related to life issues, topics related to attendees' immediate interest)
- If the meeting were co-sponsored by a community-based group

- Childcare and lunch or dinner would make it easier to attend
- Transit pass or other gift: does not affect attendance; when topic affects them, they will come, gift or not

What is the best way to notify you about a meeting or important news?

- An announcement from a community group or church: this method especially helpful.
- Postcard or letter: a good method if in a language they can read
- Advertisement in a newspaper: not as helpful because they may not get the newspaper; more likely to watch TV or listen to radio
- Other ways: inform each other through friends/word-of-mouth
- No one recommended an e-mail notice because no one had internet access

Other than a meeting, what venue/forum would you most likely use to express your views?

- Focus groups or small group meetings — a good/preferred method
- One-on-one interviews — some people indicated this would be a good option, others said many seniors would be too scared to participate
- Survey by a community group — a good option
- Write a letter — a few mentioned they might do this
- Mail survey — not likely to respond to a mail survey
- Phone comment line — not likely to respond; would hang up if someone called

**Summary Comments From
Focus Group With 23 Spanish Speakers
Oakland Fruitvale Community (July 24, 2010)
Hosted by the Spanish Speaking Citizens Foundation**

Regarding Translation Process at Meetings:

- Prefer a meeting conducted entirely in Spanish
- It helps to be able to see the person doing the translation
- Prefer a person translating rather than headsets
- Don't trust that translation is correct
- May not translate the entire response or comment
- The interpreter may inject her opinion in both translating from English to Spanish and from when translating from Spanish to English

What would draw you to a meeting/event about transportation issues?

- An interesting meeting topic
- To learn about a new service or program
- If the meeting were co-sponsored by a community-based group
- Childcare would help people be able to attend
- Transit pass or other gift would encourage attendance
- Lunch or dinner would be nice, but not as critical to their attendance

What is the best way to notify you about a meeting or important news?

- An announcement from a community group or church: this method especially helpful.
- Postcard or letter: a good method if in a language they can read
- Advertisement via television stations: a good method
- Advertisement in a newspaper not as helpful; mentioned that distribution of some community newspapers is limited
- Other ways: flyers distributed in the community
- A telephone message could be a good idea, except phone numbers tend to change frequently
- A small minority suggested an e-mail notice or use of a website; most participants did not have internet access

Other than a meeting, what venue/forum would you most likely use to express your views?

- Focus groups or small group meetings — a good/preferred method
- Other good techniques: One-on-one interviews; a survey by a community group; a survey received in the mail
- Would leave a phone message, for example, on a phone comment line
- Would write a letter to express views
- Only a few of the younger participants were open to techniques on the web



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FINAL DRAFT

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

**Final Draft for Public Review:
September 2010**

Also available in Chinese and Spanish languages

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Para solicitar una copia en español del Plan de Servicios del Idioma para Poblaciones con Aptitud de Inglés Limitada llame al 510.817.5813.

為了滿足英文程度有限的人士的需要，此報告有提供中文版本。請致電510.817.5834索取副本。

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

Introduction

Individuals who have a limited ability to read, write, speak or understand English are limited English proficient, or “LEP.” In compliance with guidance and rules issued by ~~regulations from~~ the U.S. Department of Transportation, and Title VI of the Civil Rights Act of 1964 ~~to avoid discrimination against LEP persons on the grounds of national origin,~~ MTC will take reasonable steps to ensure that all persons have meaningful access to its programs, services, and information, *at no additional cost.* ~~free of charge.~~

An LEP Plan starts with an assessment to identify LEP individuals who need assistance. Implementation includes the development of language assistance measures, staff training, notification measures to LEP individuals, and monitoring of the plan.

As the metropolitan transportation agency for the nine-county San Francisco Bay Area, MTC’s service area includes a population of some 7 million residing in over 7,000 square miles of land. The nine counties that make up the Bay Area range from urban and suburban cities to rural towns and farming communities. The population is quite diverse, with large numbers of residents favoring a language other than English.

In addition to this LEP Plan, a separate, related document, MTC’s Public Participation Plan for the San Francisco Bay Area, lays out opportunities for the public to get involved in the transportation planning process. Copies of the Public Participation Plan can be found in English, Spanish and Chinese on MTC’s website at: www.mtc.ca.gov/get_involved/participation_plan.htm.

Determination of Need

In order to prepare this Plan, MTC undertook the U.S. Department of Transportation’s four-factor LEP analysis, which considers the following:

1. The Number and Proportion of LEP Persons Served or Encountered in the Eligible Service Population
2. The frequency with which LEP persons come in contact with MTC programs, activities or services
3. The Importance to LEP Persons of MTC’s Program, Activities and Services
4. The resources available to MTC and overall cost to provide LEP assistance.

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

For planning purposes, MTC looked at American Community Survey data for people who speak English “less than very well” as Limited English Proficient persons. Table 1 shows the languages spoken at home, by ability to speak English, for persons five years of age and older, with number and percentage broken out by county. Looking at the regional totals, the five most frequently

spoken languages other than English are Spanish (8.4 percent), Chinese (3.8 percent), Vietnamese (1.5 percent), Tagalog (1.2 percent) and Korean (.5 percent).

The data shows that providing language assistance in Spanish and Chinese would give population groups that are identified as not speaking English very well and that represent greater than 5 percent of the county population access to information and services in their language spoken at home.

Table 1

Language Spoken at Home by Ability to Speak English, Persons Age 5 Years and Over, 2006-2008
San Francisco Bay Area
American Community Survey 2006-2008

County	Speaks English Less than "Very Well"						Total Speaking English Less than "Very Well"	Speaks English "Very Well"	Total
	Spanish	Korean	Chinese	Vietnamese	Tagalog	Other Languages			
Alameda	114,426 8.4%	7,947 0.6%	60,488 4.5%	15,457 1.1%	15,509 1.1%	43,983 3.2%	257,810 19.0%	1,097,653 81.0%	1,355,463 100.0%
Contra Costa	80,833 8.5%	3,165 0.3%	10,956 1.2%	2,914 0.3%	6,297 0.7%	24,179 2.5%	128,344 13.5%	822,653 86.5%	950,997 100.0%
Marin	14,911 6.4%	401 0.2%	957 0.4%	1,005 0.4%	22 0.0%	4,449 1.9%	21,745 9.3%	211,690 90.7%	233,435 100.0%
Napa ¹	19,195 15.5%	220 0.2%	75 0.1%	152 0.1%	1,326 1.1%	1,707 1.4%	22,675 18.3%	101,453 81.7%	124,128 100.0%
San Francisco	41,983 5.6%	3,280 0.4%	93,528 12.4%	7,308 1.0%	10,656 1.4%	28,581 3.8%	185,336 24.5%	571,075 75.5%	756,411 100.0%
San Mateo	58,521 8.9%	2,442 0.4%	20,098 3.1%	1,550 0.2%	14,585 2.2%	20,813 3.2%	118,009 18.0%	537,407 82.0%	655,416 100.0%
Santa Clara	147,189 9.2%	11,944 0.7%	56,985 3.6%	66,344 4.1%	16,866 1.1%	58,426 3.6%	357,754 22.3%	1,246,412 77.7%	1,604,166 100.0%
Solano	28,059 7.4%	581 0.2%	1,029 0.3%	862 0.2%	9,179 2.4%	6,261 1.6%	45,971 12.1%	333,554 87.9%	379,525 100.0%
Sonoma	42,063 9.7%	648 0.1%	1,143 0.3%	1,104 0.3%	536 0.1%	4,601 1.1%	50,095 11.5%	384,795 88.5%	434,890 100.0%
Bay Area	547,180 8.4%	30,628 0.5%	245,259 3.8%	96,696 1.5%	74,976 1.2%	193,000 3.0%	1,187,739 18.3%	5,306,692 81.7%	6,494,431 100.0%

Notes: Tabulation prepared by MTC Staff based on data from American Community Survey (ACS) 2006-2008 (Table B16001).

¹Data for Napa County not available with the standard tabulation. Extracted from ACS Public Use Microdata Samples 2006-2008.

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

MTC’s prior experience with limited English proficient persons has been overwhelmingly with Spanish and Chinese speakers. Since 2003, MTC has contracted with community-based organizations for each update of its long-range transportation plan to host community meetings to gather input from minority and low-income residents. Such meetings provide insight into the needs and concerns of residents who too often do not participate in regional government. Material is translated into the language or languages recommended by the community group. Spanish and Chinese are the two languages most often requested, although translators have been provided for Vietnamese and Lao speakers. Some meetings have been conducted entirely in Spanish or Chinese; at other times, simultaneous translation has been provided.

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

Regarding the importance to LEP persons of MTC’s programs, activities and services, in general, access to the planning process will affect residents in the long-term and not in an immediate manner. For example, MTC serves as the region’s transportation banker and planner rather than as a direct provider of services. Some of MTC’s programs, however, have a larger reach, including a regional transit fare card (known as the “Clippersm” card), a 511 traveler information system, a regional transit hub signage program, motorist-aid call boxes, freeway service patrols and automatic toll collection for the region’s state-owned toll bridges.

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

Providing translation services to allow LEP populations to participate in the development of MTC’s core planning and investment policies is a routine practice for MTC. It is worth noting, however, that there has not been a significant demand from LEP residents to participate in these policy-oriented discussions. Additionally, MTC works with many advocate groups representing LEP persons to determine their needs and concerns for planning purposes. For MTC’s programs that more directly serve Bay Area residents, measures have been incorporated to provide access for LEP populations (see Table 2). In some cases, however, the cost to implement multiple-language programs is significant and not currently funded. MTC staff is now exploring lower cost options to expand access to these programs for Spanish and Chinese language speakers.

Language Assistance Measures

MTC will use a number of techniques or practices to provide meaningful, early and continuous opportunities for all interested Bay Area residents to participate in the dialogue that informs key decisions, regardless of language barriers. This is done in a number of ways, including:

General Measures or Practices

- Robust use of “visualization” techniques, including maps, charts and photographs to illustrate trends, choices being debated, etc.
- *Avoid overly complex or technical terms and write in clear, compelling language in a style appropriate to the intended audience.*
- Translation of vital documents — including certain news releases, brochures, fact sheets and portions of the long-range regional transportation plan — *into Spanish and Chinese.*

- *Tailor county-based public participation activities to reflect the unique LEP population in each county.*
- Translation (Spanish and Chinese as a matter of routine; other languages as requested) of select printed materials for the various traveler services provided by MTC (Clippersm, FasTrak[®], Freeway Service Patrol, Call Boxes).
- Review prior experiences with LEP populations to determine the types of language services that are needed.
- Consultation with MTC's Policy Advisory Council, which includes appointed representatives from communities of color and low-income communities (populations that frequently include LEP persons).
- Use of personal interviews or use of audio recording devices to obtain oral comments at key public workshops/meetings.
- ~~Ensure competency of translators; have translators available at meetings as requested.~~
- *Contract with a language translation firm for on-call assistance (for example, interpreters for public meetings or translating documents). Establish competency of translators; have translators available at meetings as requested.*

Local Community Media

- Work with non-English language media outlets (*print or electronic media*) to place articles or *public service announcements* about MTC's work or announce participation opportunities.
- Purchase ~~display ads~~ *advertising or request public service announcements* in non-English language ~~community~~ newspapers, *radio stations or television stations* to announce public meetings for the long-range regional transportation plan, major corridor studies, or to *announce other important transportation news.*

Work with Advocates of LEP Persons

- Work to involve in MTC's activities non-profit groups that advocate on behalf of persons with limited English proficiency (for example, encourage such advocates to participate on MTC's Policy Advisory Council).
- *Partner with community groups who can assist in tailoring presentations, meeting materials and meeting announcements to meet the language needs of local participants.*
- Provide financial assistance (in response to competitive requests for proposals) to non-profits and community groups who work with LEP persons for such things as co-hosting and conducting meetings in multiple languages with simultaneous translation services (or conducting meeting entirely in a language other than English); or assistance with identifying LEP individuals for participation in community focus groups or public meetings.
- Include, as appropriate, limited-English speaking populations in random-digit telephone surveys or transit rider surveys by having bilingual staff available to conduct the survey.

Staff Training

Routine Accommodations:

MTC works to instill its staff with an awareness of and sensitivity to the needs of LEP residents. Staff is trained on procedures for accommodating LEP populations. Some of the items covered

include information about LEP guidance from the U.S. Department of Transportation, MTC's contract with a language translation firm to assist all staff in translating documents and to obtain translation services for meetings, projects or services.

Special Projects:

As public participation or public information campaigns are developed, MTC staff receives training either from consultants or from MTC public information staff about the need to be alert to and anticipate the needs of low-literacy participants. For example, planning staff who attend public workshops to answer questions and get feedback are trained to look for ways to draw out participants who seem to be reluctant to speak. When display boards are used, planners are taught to be mindful of participants who might be struggling to read complex materials and converse with them if appropriate as they view the materials rather than assuming they are able to read all the materials.

“Brown-bag” Lunch Sessions:

MTC has initiated a series of ongoing “brown bag” sessions to provide staff with a quick orientation on a number of issues. Periodically, a session will focus on special issues of diversity — including sensitivity to the needs of LEP populations.

Training Materials:

MTC will develop training materials for staff who interact with LEP populations. *The materials will include instruction on how to respond to phone inquiries and written communications from LEP persons, as well as procedures for accommodating LEP populations as described above under Routine Accommodations and Special Projects. Training materials will include instruction on how to arrange for translation services.*

Notification to LEP or Low Literacy Persons

The public must be informed of their rights under Title VI. This will be done in a number of ways:

- Notification on MTC's website.
- Documents or flyers that describe an LEP person's right to access MTC's services, translated into other languages, will be available at meetings and the MTC office.
- Notification at MTC's Library, which is open to the public
- Routine use of language on printed or electronic announcements for public workshops on key planning efforts that alert interested individuals on how to request translation services.

Monitoring and Updating of the LEP Plan

MTC will monitor requests for translations and adjust practices to meet demand while maintaining a basic level of access by LEP populations to key programs and documents. Some of MTC's customer-service oriented programs — including the 511 traveler information program — are exploring the costs and feasibility of providing increased access to their programs in Spanish and Chinese. MTC's LEP Plan will be updated periodically as needed to reflect significant changes.

Table 2: MTC Programs, Activities, Services and LEP Persons

Program, Activity, Service	LEP Component
MTC meetings, Key planning and funding activities	<ul style="list-style-type: none"> • MTC contracts with a firm to translate key documents (or summaries of documents) or provide in-person translation assistance as needed upon request. • Flyers for major community workshops and similar meetings include instructions on how to request translation services. • MTC’s Web site includes Spanish and Chinese language content, including translated versions or summaries of selected documents. • Public participation plans for MTC’s long-range plan include seeking out views of LEP populations (including conducting meetings in other languages and sensitivity to the needs of low-literacy populations). • Multi-lingual notification at meetings on how to request translation services.
Motorist-aid call boxes	<ul style="list-style-type: none"> • Instructions on call boxes in English and Spanish; English- and Spanish-speaking dispatchers are available at all times through the toll-free dispatch center; for other languages, dispatchers connect speakers to a translations service for assistance (available at all times).
Freeway Service Patrol	<ul style="list-style-type: none"> • Tow truck drivers have a card available in multiple languages (Spanish and Chinese, Vietnamese, Tagalog); translation service is available to assist via telephone through dispatch center.
FasTrak [®]	<ul style="list-style-type: none"> • Applications available in Spanish and Chinese; • Advertising and news releases done in Spanish and Chinese.
Clipper sm universal transit ticket	<ul style="list-style-type: none"> • The program is available in English, Spanish and Chinese. Materials are printed in these three languages (separate versions in each language). Likewise, advertising is trilingual (separate versions in each language), telephone service (automated service) is available in these three languages; for self-serve “add value” machines, customers can select their language preference when they begin a transaction. • Website is in English with short program overviews in both Spanish and Chinese. • Customer service center’s live support can connect with a translation service. • Card readers themselves are English-only due to limited capacity and a small display screen.

Program, Activity, Service	LEP Component
511 traveler information	<ul style="list-style-type: none"> • 511.org homepage – Google translator drop-down menu, options for Chinese and Spanish translations. • Traffic page – Google translator drop-down menu, options for Chinese and Spanish translations • Transit page – includes professionally translated summary of Transit site services in Chinese and Spanish as well as Google translator for Chinese and Spanish. • Rideshare page – includes professionally translated summary of Rideshare program services in Chinese and Spanish as well as Google translator for Chinese and Spanish. • Bicycling page – Google translator links for Chinese and Spanish • Language Disclaimer – All websites include language disclaimer stating that machine translation is imperfect. • 511 Phone – Rideshare and Bicycling menus have prompts in Spanish. When transferred to a live operator, customers can speak to rideshare/bicycling operators who are proficient in Spanish. For customers needing assistance in other languages, the operators use a language translation service. The other phone menu selections do not include prompts in other languages.
<i>Regional</i> transit hub signage program	<ul style="list-style-type: none"> • Way-finding and transit information signs intentionally rely on universal icons/pictographs to bridge language barriers. Limited space for text on signs precludes use of languages other than English in most cases.