SANDAG

LANGUAGE ASSISTANCE PLAN | June 2025

Free Language Assistance | Ayuda gratuita con el idioma | Libreng Tulong sa Wika | Hỗ trợ ngôn ngữ miễn phí
免費語言協助 | 免费语言协助 | مساعدة ترجمة مجانية | 무료 언어 지원 | کمک زبان رایگان | 無料の言語支援 | Бесплатная языковая помощь
Assistência linguística gratuita | मुफ्त भाषा सहायता | Assistance linguistique gratuite | ជំនួយភាសាឥតគិតថ្លៃ
ఉచిత భాషా సహాయం | ການຊ່ວຍເຫຼືອດ້ານພາສາຟຣີ | Kaalmada Luqadda ee Bilaashka ah | Безкоштовна мовна допомога

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Table of Contents

List of Figures

Definitions

- **Bilingual:** Ability to speak two languages fluently and without effort; fluency and bilingual skills may be measured and certified.

- **Community-Based Organization (CBO):** A local, non-profit, non-governmental organization that represents the interests of a community or particular population within the community.

- **Cultural Competency:** Programs or content that understand and effectively respond to cultural diversity.

- **English Learner:** Students learning English as a second language as identified by the California Department of Education (DOE).

- **Equity and Equality:** Equity ensures access, opportunity, and advancement for all people, and strives to identify and eliminate barriers that prevent the full participation of some groups. Equality ensures the same access, opportunity, and advancement for all people; it aims to promote fairness but can only work if everyone starts from the same place.

- **Executive Order:** Rule or order issued by the U.S. President to an executive branch of the government and having the force of law.

- **Federal Transit Administration (FTA):** Operating administration of the U.S. Department of Transportation (U.S. DOT); it provides financial and technical assistance to the San Diego Association of Governments (SANDAG) (and SANDAG passes such funding through to local public transit systems).

- **Four Factor Analysis:** Framework developed by the U.S. DOT to help agencies determine the number of persons in their community that do not speak English very well and develop programs to assist Limited English Proficiency (LEP) persons in interacting with government agencies such as SANDAG.

- **Interactive Voice Recognition (IVR) phone system:** Automated phone system that callers interact with, and which gathers information from callers via a menu, without contact with a live person.

- **Interpretation:** Oral, real-time translation from one language into another.

- **Interpretation (simultaneous versus consecutive):** Through simultaneous interpretation, the interpreter speaks at the same time as the speaker and voices may overlap; through consecutive interpretation, the person with LEP speaks, followed by the interpreter, and there are pauses or breaks between sentences when each is speaking.

- **"I Speak" cards:** Tool which allows a person to identify what language they speak.

- **Limited English Proficiency (LEP):** Persons with LEP are those for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English; LEP designation includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all.

- **National Origin Discrimination:** Treating people unfavorably because they are from a particular country or part of the world, including because of ethnicity, because they speak a foreign language, or because they speak English with an accent.

- **Over the Phone Interpretation:** Three-way call interpreting service, where the interpreter works during the conversation between two parties who speak different languages; this service is typically provided remotely.

- **Safe Harbor Language:** Language spoken by at least 1,000 persons with LEP in the SANDAG region, as defined by the FTA.

- **Title VI:** Title VI of the Civil Rights Act of 1964, which prohibits recipients of federal funding from discriminating on the basis of race, color, or national origin.

- **Translation:** Written rendering of text from one language into another while preserving meaning.

- **Vital Document:** A document that contains information that is critical for obtaining federal services and/or benefits, or is required by law.

Executive Summary

1. Background and Introduction

Agencies that receive funds from the U.S. Department of Transportation (U.S. DOT) are responsible for providing language assistance measures to persons with Limited English Proficiency (LEP). To ensure compliance, the U.S. DOT developed a four-factor framework and guidance to help agencies determine the number of persons in their community that do not speak English very well and develop programs to assist them in interacting with government agencies such as the San Diego Association of Governments (SANDAG). The U.S. DOT guidance also requires agencies to prepare Language Assistance Plans to outline the measures that an agency will take to assist persons who do not speak English very well. This document summarizes the Four Factor Analysis conducted by SANDAG and identifies the language assistance measures provided by SANDAG. It also identifies how the agency trains employees and provides notice to people with LEP and details how the plan will be monitored. Providing language assistance is deeply connected with SANDAG's Commitment to Equity and to creating a San Diego region where every person who visits, works, and lives can thrive.

2. Four Factor Analysis

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered bya program, activity, or service of the recipient or grantee.

Following Factor 1 U.S. DOT Guidance, multiple sources—including the U.S. Census American CommunitySurvey (ACS), California Department of Education (DOE), County of San Diego Department of Behavioral Health Services, and San Diego Superior Court—were used to determine the number of people with LEP in San Diego County. According to these findings, about 400,000 people five years or older speak English less than very well. This accounts for 13% of the county's population. There are more than 245,000 Spanish speakers who speak English less than very well, and this is about 64% of the LEP population in San Diego County. Tagalog and Filipino, Vietnamese, Chinese (all dialects), and Arabic have between 15,000 and 30,000 speakers who don't speak English very well. Twelve other languages or language groups were identified as having more than 1,000 speakers who do not speak English very well. One thousand speakers is the minimum threshold for safe harbor protection established by the federal government.

Figure Ex-1: Safe Harbor Languages

Safe Harbor Languages	
1	Spanish
2	Tagalog (incl. Filipino)
3	Vietnamese
4	Chinese (Mandarin and Cantonese)
5	Arabic
6	Korean
7	Persian (incl. Farsi, Dari)
8	Japanese
9	Russian
10	Portuguese
11	Hindi
12	French (incl. Cajun)
13	Khmer
14	Telugu
15	Lao
16	Somali
17	Ukrainian

Based on data in Factor 1, it is recommended that SANDAG provide safe harbor protections to speakers of the 17 languages shown in Figure Ex-1. Each of these languages is estimated to have at least 1,000 speakers who reside in San Diego County and who do not speak English very well.

Factor 2: *The frequency with which LEP individuals come in contact with the program, activity, or service.*

Information on the frequency that persons with LEP come in contact with SANDAG was assessed based on a survey of employees, follow-up interviews, focus groups made up of individuals with LEP from five language groups, and a review of available data collected by SANDAG on LEP contacts.

All SANDAG employees were sent an email with a link to an online survey regarding their interactions with individuals with LEP and the resources available for communication. About one fourth, or 103 employees, provided complete responses.

The focus groups were held to help understand, from the perspective of people with LEP, how frequently individuals with LEP come in contact with SANDAG programs, services, and staff. The language groups were selected based on the prevalence of speakers from the 2019 Factor 1 results and the availability of community-based organization (CBO) partners that could hold focus groups in those languages.

The greatest number of contacts with individuals who have LEP are in Spanish, which is consistent with the findings of Factor 1 and reflective of the cross-border planning relationship with and geographic proximity to Mexico. The absence of data showing contact with other language groups appears largely due to people not being aware of SANDAG, its role, and the services it provides. Part of this issue is that many recent immigrants and non-English speakers come from nations that do not have organizations like SANDAG that provide services such as FasTrak, or no-cost services such as 511, the Freeway Service Patrol, or highway call boxes. Greater awareness of SANDAG's role and services in the LEP community will increase contacts.

Factor 3: *The nature and importance of the program, activity, or service provided by the recipient to people's lives.*

SANDAG is a multifaceted organization that carries out planning activities which rely on significant public input, and also provides services for the public. Many of the programs SANDAG administers and projects the agency builds have a direct impact on the public, including individuals with LEP.

Focus groups for individuals with LEP sought to identify the importance of SANDAG in their lives. The results from the focus groups generally found a low level of awareness of SANDAG programs and little contact with the agency. Most people were unaware they have a right to communicate with SANDAG in their native languages, and many stated they felt intimidated to communicate with a government agency because of their poor English. Spanish speakers seemed to be more aware of SANDAG programs and were more willing to communicate with the agency than members of other language groups.

The individuals who participated in the focus groups placed a high level of importance on being able to communicate with elected representatives though the Board of Directors and Policy Advisory Committees (PACs). Transit riders also felt it was important to be able to comment on fare changes. Even though few had used Motorist Aid, or even knew of its existence, the individuals participating in the focus groups found the Motorist Aid Services, including the Freeway Service Patrol and call boxes, to be particularly important. The 511 system, except for requesting Motorist Aid, was not seen as particularly important because more easily accessible traffic/transit information alternatives exist. iCommute was not viewed as important because none of the participants had a need for the services provided.

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

The U.S. DOT LEP guidance recognizes the level of language assistance provided by agencies will differ based on the size of the establishment and the resources or budget available. The guidance directs agencies to take reasonable steps to provide language access; if the costs substantially exceed the benefits, additional actions may not be necessary.

The total resources dedicated to supporting individuals with LEP is not available in a single, centralized location, making the estimation of total resources very difficult. Individuals with LEP constitute about 13% of the total population of San Diego County. As a rough measure, one would expect at least 13% of the total communications budget to be spent on communicating with individuals with LEP. With direct LEP costs estimated to be about $282,000, the expenditure is equivalent to about 27% of the direct communications costs, excluding project communications costs, which are budgeted separately. Therefore, it appears that percentage of costs associated with providing service to individuals with LEP exceeds the percentage of LEP population in San Diego County. This is a rough indication that SANDAG resources are reasonable.

3. Language Assistance Measures

It is SANDAG's policy to provide timely, meaningful access for persons with LEP to its services and decision-making processes. SANDAG communicates with individuals with LEP in person and through virtual platforms, over the phone, in writing, and through digital media as provided in this Language Assistance Plan (LAP). The LAP is an important component of SANDAG's Commitment to Equity. An effective LAP will help ensure historically underserved, systemically marginalized, and otherwise linguistically isolated groups can receive the full benefit of SANDAG programs, services, and facilities, and can participate in public engagement opportunities conducted by SANDAG. SANDAG is committed to creating a region where every person, regardless of the language they speak, has a bright future.

This LAP for SANDAG has seven elements:

1. Identify a person, department, and staff advisory group responsible for ensuring LEP compliance
2. Identify existing language assistance measures
3. Identify vital documents
4. Provide training for staff on LEP requirements
5. Identify new services and resources to be made available for language services by functional area

6. Recommend an agency compliance monitoring process to ensure language access services are being made available and monitor encounters with individuals with LEP

7. Advocate internally and externally to enable SANDAG to better serve individuals with LEP

The plan also contains recommendations for updating the LAP and for monitoring language assistance efforts to ensure language access services are being made available.

The Four Factor Analysis identified 17 languages that meet the safe harbor threshold. The number of persons ranged from in excess of 245,000 Spanish speakers to more than 1,000 estimated Ukrainian speakers. Spanish is the language most spoken by persons with LEP and—given factors such as the historical role of Spanish in the region, the close relationship with Tijuana, and crossborder flows of people—Spanish has a unique importance for SANDAG. Four languages—Chinese, Tagalog/Filipino, Vietnamese, and Arabic—have significant populations of people with LEP, and those groups are substantially smaller than the Spanish-speaking LEP population. There are 12 additional language groups consisting of between 1,000 and 7,500 individuals that meet the threshold for safe harbor designation. The wide range in the sizes of the language group populations and the historical and geographic proximity issues support the use of a priority designation for the languages which were used to develop language assistance measures. The Language Priority Groups are shown in Figure Ex-2. (Language designations in this table are as provided in U.S. Census Bureau data.)

Figure Ex-2: Language Priority Groups

Priority 1	Priority 2	Priority 3
Spanish	Tagalog/Filipino Vietnamese Chinese: Mandarin (oral); Simplified (written) Arabic	Chinese: Cantonese (oral); Traditional (written) Korean Persian Japanese Russian Portuguese Hindi French Khmer Telugu Lao Somali Ukrainian

4. Monitoring and Updating

The Four Factor Analysis and LAP will be reviewed and updated, if necessary, every three to five years to ensure alignment with the most recent available data, the SANDAG Equity Action Plan, and any significant changes in the SANDAG Title VI Program. The Director of Diversity and Equity is responsible for the review and update of the document and for monitoring the implementation of the plan, which falls under the Department of Organization Effectiveness.

1. Introduction

About SANDAG

SANDAG is the regional planning agency as well as the technical and informational resource for the San Diego, California area's 18 incorporated cities and the county government, which collectively make up the association of governments. A Board of Directors comprising elected officials from each of the 19 member agencies governs SANDAG. Advisory representatives from Imperial County, the U.S. Department of Defense, California Department of Transportation (Caltrans), Port of San Diego, San Diego County Water Authority, Metropolitan Transit System (MTS), North County Transit District (NCTD), Southern California Tribal Chairmen's Association, San Diego Regional Airport Authority, and Mexico supplement the voting members. The agency's planning boundary is the jurisdictional limits of the County of San Diego; in addition, SANDAG partners with agencies in Mexico and throughout Southern California. In 2020, the county population was estimated at 3,351,737.[1]

SANDAG was created in 1966 as a comprehensive planning organization (CPO) under a state-authorized joint powers agreement. The governor of California designated the CPO as the metropolitan planning organization for the region in 1970. In 1972, the CPO was established as a joint powers authority. It adopted its current name in 1980 to better reflect its purpose. In 1987, SANDAG added the responsibilities of administering the region's voter-approved half-cent sales tax for regional transportation projects—TransNet.

On January 1, 2003, Senate Bill 1703 (Peace, 2002) (SB 1703) was enacted and changed SANDAG's structure from a joint powers authority to a state-created regional governmental agency, which made it a permanent (rather than voluntary) association of local governments with increased responsibilities and powers. SB 1703 consolidated MTS's and NCTD's transportation planning and development functions into SANDAG so those activities would occur multimodally.

The roles and responsibilities of SANDAG, MTS, and NCTD are outlined in a master memorandum of understanding executed on April 23, 2004. SANDAG is responsible for transit planning, development, and construction, whereas MTS and NCTD are responsible for transit operations. MTS and NCTD also manage small construction projects with SANDAG's assistance, and SANDAG is responsible for establishing the regional fare policy.

SANDAG Commitment to Equity Statement

In February 2021, the SANDAG Board of Directors adopted the following Commitment to Equity statement:

> *We hold ourselves accountable to the communities we serve. We acknowledge we have much to learn and much to change; and we firmly uphold equity and inclusion for every person in the San Diego region. This includes historically underserved, systemically marginalized groups affected by actions and inactions at all levels of our government and society. We have an obligation to end disparities and ensure that safe, healthy, accessible, and inclusive opportunities are available to everyone.*

[1] Source: U.S. Census Bureau 2020 Census.

We have an obligation to eliminate disparities and ensure that safe, healthy, accessible, and inclusive opportunities are available to everyone. The SANDAG equity action plan will inform how we plan, prioritize, fund, and build projects and programs; frame how we work with our communities; define how we recruit and develop our employees; guide our efforts to conduct unbiased research and interpret data; and set expectations for companies and stakeholders that work with us.

We are committed to creating a San Diego region where every person who visits, works, and lives can thrive.

Background

Title VI of the Civil Rights Act of 1964 (Title VI) states, "No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance." In the 1974 case of *Lau v. Nichols* (414 U.S. 563), the Supreme Court interpreted the Title VI ban on national origin discrimination to hold that Title VI prohibits conduct that has a discriminatory impact on individuals with LEP.

On August 11, 2000, President Bill Clinton signed Executive Order 13166, *Improving Access to Services for Persons with Limited English Proficiency*. This executive order directs federal agencies to examine the services they provide and to develop and implement a system by which persons with LEP can access those services meaningfully. Federal agencies were instructed to publish guidance for their respective recipients to assist them with their obligations to persons with LEP under Title VI.

The U.S. DOT published guidance for its recipients in 2005, the *Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons* (Volume 70, Number 239). The guidance states that Title VI and its implementing regulations require that U.S. DOT recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals with LEP. The guidance also suggests recipients use the U.S. DOT LEP policy guidance to determine how best to comply with statutory and regulatory obligations to provide meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals with LEP. The guidance proposes a structure—the Four Factor Analysis—for determining the best approach to provide language assistance.

The Federal Transit Administration (FTA) Title VI circular 4702.1B provides the definition of LEP used in this report. It states persons with LEP are those "for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all."

SANDAG used these resources to guide development of this LAP. SANDAG intends this plan will address the needs of and provide meaningful assistance to individuals with LEP in San Diego County. The LAP summarizes findings of the Four Factor Analysis, identifies persons who need language assistance and how they will be notified about the availability of such assistance, details what language assistance measures SANDAG will take and how employees will be trained to carry them out, and specifies how the plan will be monitored and updated.

California law also provides protections for individuals with LEP, found in the California Civil Rights Act (Unruh Act; California Code 11135) and the Bilingual Services Act (California Code 7290). Unlike federal protections, these statutes do not have regulations that require proactive measures to identify LEP populations and develop programs to ensure their language needs are meet. Agencies have local discretion to determine how large the LEP population must be before providing services in another language. The best practice for local agencies is to adopt the state standard to provide services if any language group constitutes 5% of the population being served. As a result, compliance with California law will be attained if the federal requirements are met and implemented.

The Four Factor Analysis and Language Assistance Plan

Guidance issued by the U.S. DOT and the FTA requires each agency that receives federal funding to prepare a Four Factor Analysis. The Four Factor Analysis must address the following four topics:

- *Factor 1:* *The number or proportion of persons with LEP eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee*

- *Factor 2:* *The frequency with which individuals with LEP come in contact with the program, activity, or service*

- *Factor 3:* *The nature and importance of the program, activity, or service provided by the recipient to people's lives*

- *Factor 4:* *The resources available to the recipient and costs*

The Four Factor Analysis provides the groundwork for developing this LAP which addresses how SANDAG will communicate with and provide services to persons with LEP.

2. Factor 1: Identifying Individuals with Limited English Proficiency Who Need Language Assistance

Federal guidance from the U.S. DOT requires federal funding recipients to identify the number or proportion of individuals who have LEP and are likely to come in contact with federally funded services and programs. Any individual older than five years of age who does not speak English very well is considered to have LEP, and every program at an agency that receives any federal funding must comply with the requirement, regardless of whether federal money funds the specific program.

The U.S. DOT and FTA guidance also address how to determine whether the population of speakers of a particular language reaches a minimum that would trigger a requirement to provide translated vital documents—the safe harbor requirement. The presence of at least 1,000 individuals or 5% of the population (whichever is less) who speak a language other than English and do not speak English very well triggers the safe harbor requirement.

The goal of Factor 1 is to determine which San Diego County populations meet the safe harbor threshold. The goal of the federal and state legislation, regulations, and guidance is to encourage government agencies to provide additional services in alternative languages to ensure individuals with LEP are not subject to discrimination.

Data Sources and Findings

Determining the precise number of persons with LEP is more nuanced than simply consulting the U.S. Census Bureau because it's possible that not all limited English speakers are included in Census statistics, and the Census may inadequately stratify the languages found in all communities. In preparing Factor 1, other state and local data on language use and predominance supplemented Census data.

U.S. Census Bureau American Community Survey

The U.S. Census Bureau ACS replaced the long form of the decennial Census and is conducted continuously throughout the year. Nationally, about 250,000 households are surveyed monthly, and the survey includes questions about English language proficiency (unlike the decennial Census). Based on the survey results, estimates are prepared based on one year and five years of data (Figure 2-1). There can be differences between the one-year and five-year estimates, and by using both sets of data, a valid picture of a particular data set can be achieved. The most recent year of available ACS data is 2019. The one-year estimate shows almost 400,000 individuals with LEP in San Diego County (393,293), and the five-year estimate shows more than 425,000 individuals with LEP (426,297). Figure 2-1, Column 1 shows the one-year estimate for each language group at the county level, and Column 3 shows the five-year estimate based on the San Diego Public Use Microdata Areas (PUMAs). PUMAs are nonoverlapping, statistical geographic areas that partition each state or equivalent entity into geographic areas.

Figure 2-1: Limited English Proficiency Speakers in San Diego County by Language and Data Source

Language	1 LEP Individuals; ACS B16001; 2019 1YR County	2 % of LEP Individuals	3 LEP Individuals; ACS B16001; 2019 5YR PUMA	4 % of LEP Individuals	5 English Learner Data; SD County; 2020–2021	6 SD Superior Court Interpretation Requests 2019–2020	7 County of San Diego Behavioral Health Services FY 2021–22	8 MTS Languages for Vital Documents 2019
Spanish	245,246	63.63%	268,664	65.08%	67,546		3,609	114,295
Tagalog (incl. Filipino)	29,583	7.68%	32,705	7.92%	1,702	207	44	7,988
Vietnamese	24,601	6.38%	25,411	6.16%	1,562	511	245	12,276
Chinese (incl. Mandarin, Cantonese)	22,033	5.72%	23,858	5.78%	1,007	243	42	7,161
Arabic	15,274	3.96%	13,251	3.21%	2,668	733	330	5,091
Korean	7,824	2.03%	7,620	1.85%	574	40	39	2,855
Persian (incl. Farsi, Dari)	7,501	1.95%	6,499	1.57%	905	240	42	1,301
Japanese	4,511	1.17%	5,288	1.28%	510		3	1,181
Russian	4,262	1.11%	4,176	1.01%	537	78	33	
Portuguese	3,084	0.80%	2,301	0.56%	265	58	5	
Hindi	2,086	0.54%	1,736	0.42%	147			
French (incl. Cajun)	1,110	0.29%	1,526	0.37%	203		8	
Khmer	1,017	0.26%	1,670	0.40%	131	78	120	
Italian	908	0.24%	1,318	0.32%	65		1	
German	650	0.17%	1,259	0.30%	89		3	
Telugu	1,119	0.29%	879	0.21%	175			
Pashto					310			
Kurdish (Kurdi, Kurmanji)					220			
Armenian			411		14		6	
Turkish					84		2	
Polish			590		38		2	
Thai, Lao, or other Tai-Kadai languages	3,221		4,087					
Lao					178	44	23	1,347
Thai					65		6	
Amharic, Somali, or other Afro-Asiatic languages	9,938		8,405					
Chaldean					1,718			1,989
Somali					796			
Assyrian					54			1,591
Amharic					85			
Ukrainian or other Slavic languages	1,466		1,175					
Ukrainian					17			

SANDAG

The U.S. Census Bureau clusters some languages into families, which means it is impossible to determine whether some specific languages meet the safe harbor threshold requirement contained in the U.S. DOT guidance based on the ACS alone. Other data sources must be consulted to fully understand the San Diego region's limited English population.

California Department of Education English Learner Data

The California DOE collects data from every kindergarten to grade 12 school in the state on the number of students learning English as a second language. The DOE data do not combine data into language families; therefore, the data sometimes can provide more detail about individual languages within the language families reported in the ACS. For example, the ACS lumps together Thai, Lao, and other Tai Kadai languages, while the DOE English Learner data show that this group is predominately Lao in San Diego County. Similarly, the ACS data do not specifically list Chaldean or Somali as separate languages—the ACS combines them in a language group with Amharic and other Afroasiatic languages. There is, however, an active Chaldean community in El Cajon, and CBOs report a recent influx of Somali-speaking immigrants. DOE English Learner data shows that Chaldean and Somali speakers account for most of the individuals in this ACS grouping.

The ACS data do not distinguish among Chinese dialects; this is a significant issue because someone who speaks one dialect may not understand someone who speaks a different dialect. A further complication arises in relation to written language, because immigrants from Taiwan, Hong Kong, and Macau—who speak different Chinese dialects—use the Traditional Chinese writing system rather than the Simplified system used in China and elsewhere. The DOE English Learner data show that of 1,019 Chinese-speaking English learners, about 84% are Mandarin speakers, and 15% are Cantonese speakers. Other dialects make up less than 1% of Chinese-speaking English learners.

The ACS one-year data show more than 1,400 individuals in San Diego County speak one of the languages in the "Ukrainian or other Slavic Languages" group, which includes Bulgarian and Czech in addition to Ukrainian. The DOE English Learner data list only Ukrainian students; none are shown for Bulgarian or Czech. In addition, recent news articles indicate that the war in Ukraine has increased refugee resettlement in San Diego County. For these reasons, the analysis suggests that it is appropriate to include Ukrainian in the list of languages which may exceed the 1,000-person safe harbor threshold.

The DOE English Learner data for San Diego County schools are shown in Figure 2-1, Column 5.

San Diego Superior Court Interpretation Request Data

The San Diego Superior Court tracks interpretation requests for all nonfederal courts in San Diego County. These data reflect the language needs of participants in court proceedings, so they also may reflect the number of individuals involved in court proceedings by national origin. The data also show far greater demand for Lao interpretation (44 requests) than Thai (no requests). The San Diego Superior Court interpretation request data for 2019–2020 are shown in Figure 2-1, Column 6.

County of San Diego Department of Behavioral Health Interpretation Services

The County of San Diego Department of Behavioral Health Services also tracks interpretation requests. The data appear to confirm Lao is the predominant Tai Kadai language in San Diego County. The Behavioral Health Services interpreter data for fiscal year 2021 are shown in Figure 2-1, Column 7.

Metropolitan Transit System Four Factor Analysis

As a direct recipient of federal funding, MTS also must prepare a Four Factor Analysis and LAP based on the U.S. DOT regulations and FTA guidance. The area MTS serves is less than the entire county; however, any language that meets the safe harbor requirement in the portion of the county MTS serves also would meet the safe harbor requirement for SANDAG and the entire county. MTS prepared its most recent Four Factor Analysis in 2019, and it uses ACS data as well as an onboard survey and records from frontline staff to develop its estimate of LEP populations in San Diego. MTS defines a person with LEP as someone whose primary language is not English and who has a limited ability to read, write, speak, or understand English. This is slightly different from the definition used by SANDAG, which is anyone who speaks English less than very well.

As shown in Figure 2-1, Column 8, MTS concluded the counts of Lao, Chaldean, and Assyrian speakers with LEP exceed the 1,000-person safe harbor threshold.

County of San Diego Registrar of Voters

The County of San Diego Registrar of Voters also must comply with both federal and state language assistance regulations. Although data are unavailable to support its decision on which language services are provided, translations are provided in Spanish, Filipino, Chinese, and Vietnamese, and machine translation is provided for other languages via Google Translate. Translated materials include the entire web page, voter pamphlets, and polling place signage and information.

Location of Populations with Limited English Proficiency

Title VI of the Civil Rights Act of 1964 prohibits discrimination based on national origin. National origin discrimination involves treating people unfavorably because they are from a particular country or part of the world, because of ethnicity, because they speak a foreign language, or because they speak English with an accent. All those factors can be taken as indicators of a person's national origin.

The map in Figure 2-2 shows the distribution of foreign-born persons in San Diego County. These are persons who are protected by the national origin clause of Title VI, even though they may speak English very well. There are large areas of the densely populated western portion of the county where between 25% and 50% of the population are foreign born. There are three principal areas—south of I-8, along the SR 56 corridor, and along the SR 78 corridor—with significant communities of foreign-born persons.

The map in Figure 2-3 shows the distribution of residents that speak a language other than English at home. The map in Figure 2-3 closely resembles the general patterns shown in Figure 2-2 with the addition of some large, low-density areas in east county where residents speak a foreign language at home. In a number of geographies, including several which share a border with Mexico, more than 50% of residents speak a language other than English at home.

Figure 2-4 identifies the areas of the county where there are concentrations of population that do not speak English very well. As previously stated, this is the definition of limited English proficiency as identified for protection by the U.S. DOT LEP regulations and FTA guidance. The purpose of this Four Factor Analysis is to identify the people and the languages they speak, regardless of where they were born. In western San Diego County, the areas with individuals with LEP follow the same patterns as in the previous maps, focused south of I-8 and along SR 56 and SR 78, with some additional pockets in the rural portions of the county. In general, these areas are smaller than the areas shown for foreign born or speaking a foreign language at home except in the rural part of the county.

Spanish speakers make up the largest percentage of individuals with LEP. Their distribution in San Diego County is shown in Figure 2-5. There are large concentrations south of I-8 and along SR 78 in western San Diego, as well as large parts of the rural areas in eastern San Diego. The corridor along SR 56—which showed large concentrations of foreign-born residents who speak a language other than English at home or residents with LEP—is not home to a concentration of Spanish speakers.

The four maps show that SANDAG should expect to encounter persons with LEP in most areas of the county, especially in the western and southwestern areas of the county.

Figure 2-2: Foreign-Born Population in San Diego County

Foreign Born Population

San Diego County

- < 25%
- 25% - 50%
- > 50%

One in four residents of San Diego County were born outside the U.S.

Data Source: 2019 American Community Survey, Table B16008, 5-Year Tract data

MILES
0   3   6

0   4   8
KILOMETERS

SANDAG

04/07/2022

Speaks a Language Other Than English at Home
San Diego County

- < 38%
- 38% - 50%
- > 50%

Almost 38% of San Diego County residents speak a language other than English at home

Data Source: 2019 American Community Survey, Table B16004, 5-Year Block Group data
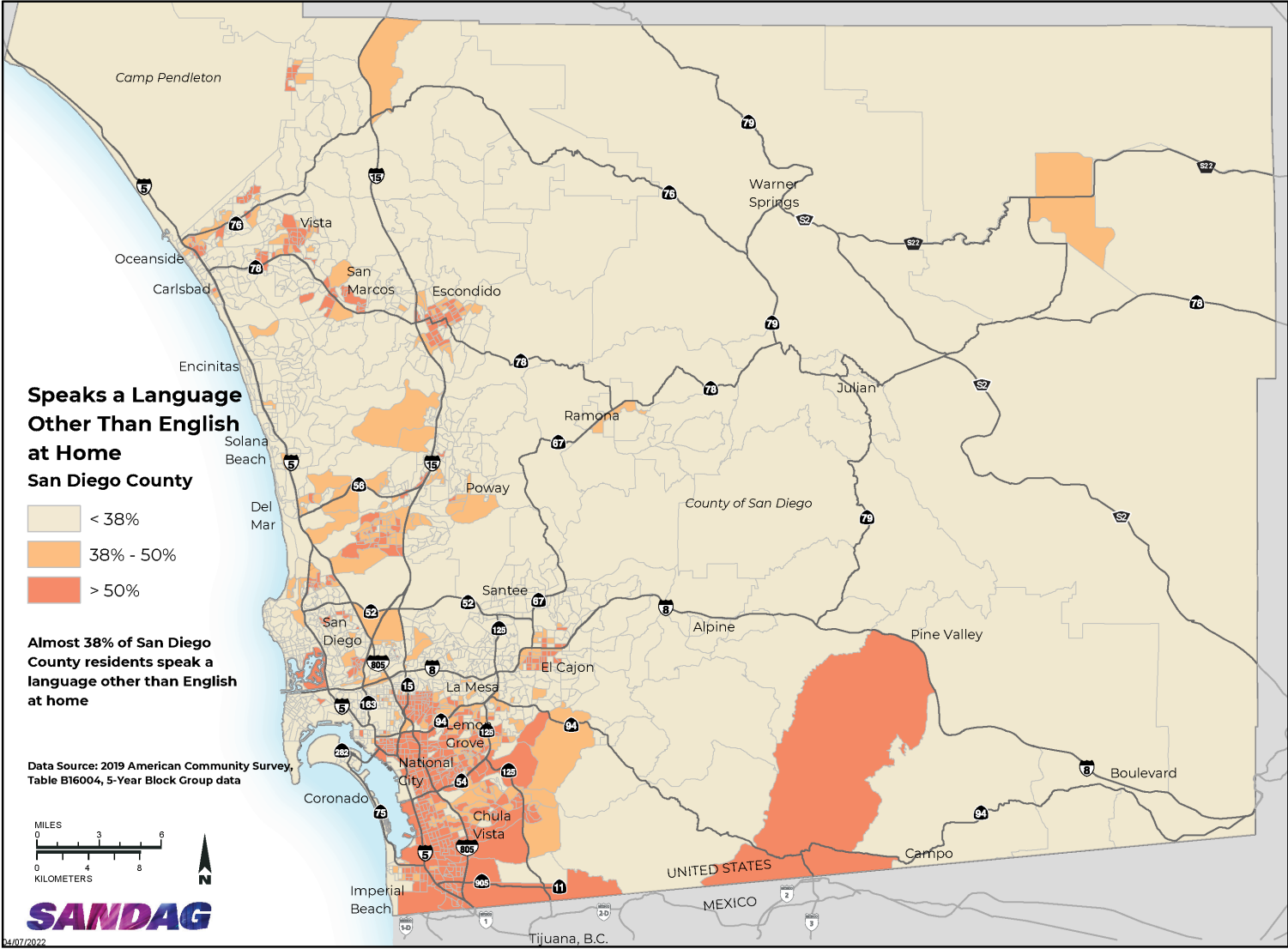
Figure 2-4: Limited English Proficient Population in San Diego County

Limited English Proficient (LEP) Population
San Diego County

- < 14%
- 14% - 25%
- > 25%

Approximately one in seven San Diego County residents speaks English less than very well, and is considered to have limited English proficiency

Data Source: 2019 American Community Survey, Table B16004, 5-Year Block Group data

SANDAG

04/07/2022
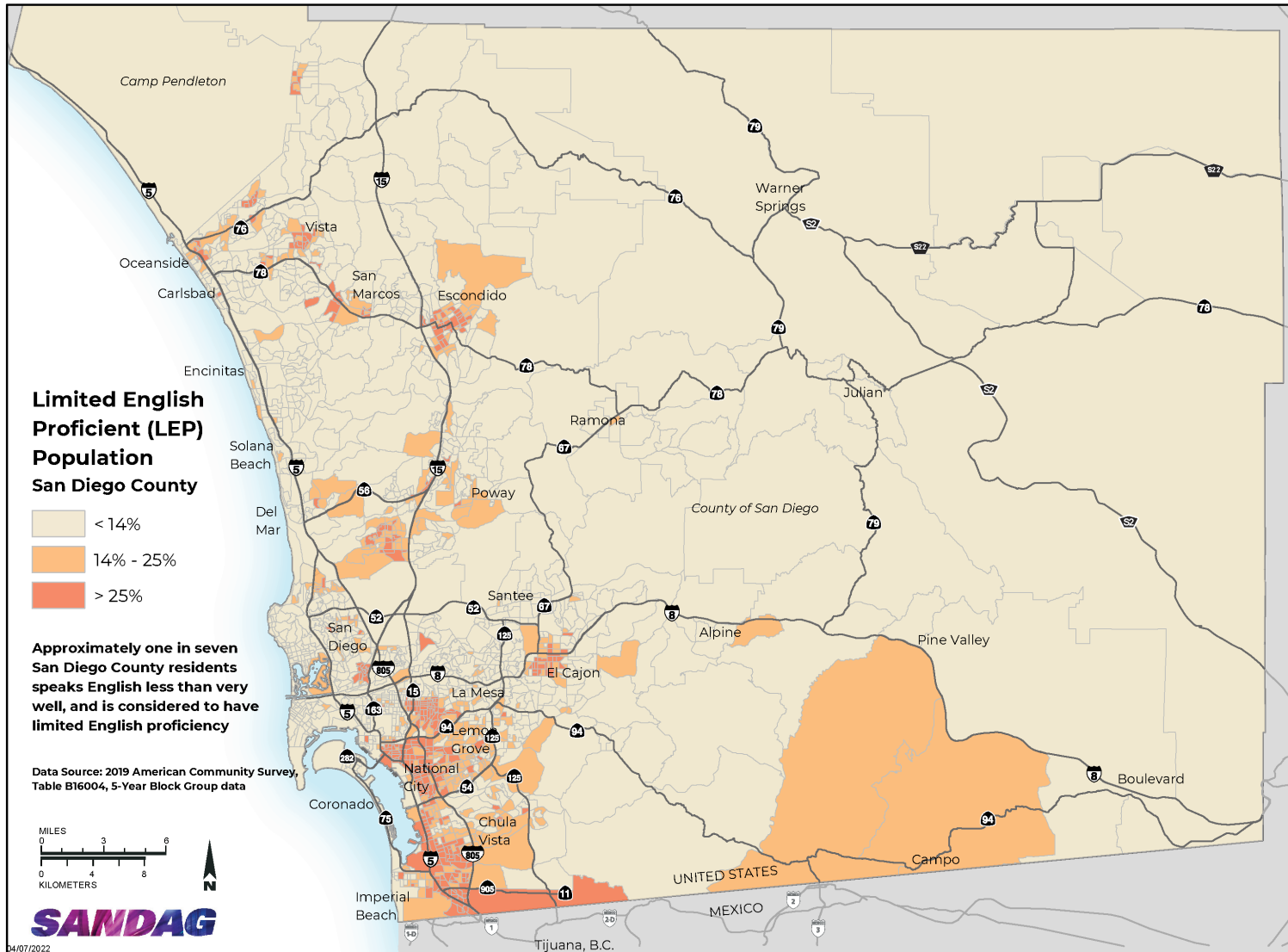
Spanish Speaking Population with Limited English Proficiency (LEP)
San Diego County

< 9%
9% - 25%
> 25%

Spanish-speaking residents with LEP make up almost 9% of the total County population

Data Source: 2019 American Community Survey, Table B16004, 5-Year Block Group data
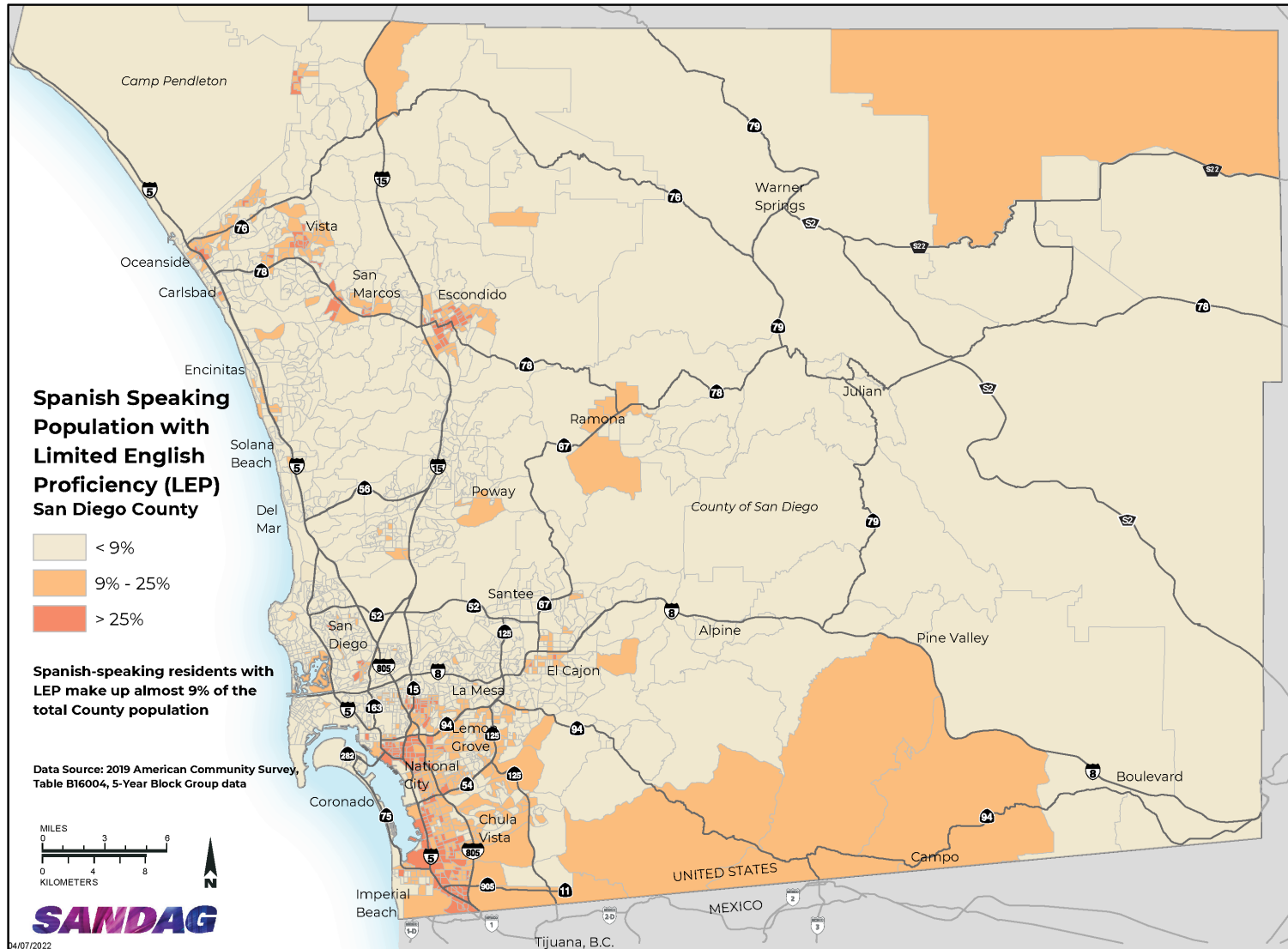
SANDAG Safe Harbor Languages

Based on data from multiple federal, state, and local sources, it is recommended that SANDAG provide safe harbor protections to speakers of the 17 languages shown in Figure 2-6. Each of these languages is estimated to have at least 1,000 speakers who reside in San Diego County and who do not speak English very well. Several of the languages have special considerations that are important to understand when providing language assistance.

Chinese

There are eight major Chinese dialects: Mandarin (Putonghua), Cantonese (Yue), Shanghainese (Wu), Fuzhou (Minbei), Taiwanese (Minnan), Hakka, Xiang, and Gan. Mandarin (or Putonghua, which means "common language") is China's predominant language; more than 80% of the population uses it widely. Cantonese is spoken by many who live in southern China and Hong Kong, which is from where most of the early immigrants to the United States originated. In addition to the spoken dialects, there are two forms of written Chinese. China, Malaysia, and Singapore use the fairly modern Simplified character system, while the Traditional character system continues to be used in Taiwan, Hong Kong, and Macau.

The DOE English Learner data suggest Cantonese speakers are about 15% of the total Chinese speakers, or about 3,400 individuals, which meets the safe harbor threshold. There is no information to determine what percentage of the Mandarin and Cantonese speakers use Traditional characters; however, it appears likely that a high percentage of Cantonese (from Hong Kong or Macau) and some Mandarin speakers (from Taiwan) use Traditional characters.

Tagalog/Filipino

More than 180 languages and dialects are spoken in the Philippines, and Filipino, a standardized version of Tagalog, is the national language. Prior to 1987, because of the country's relationship with the United States, English was the sole language of instruction, and many immigrants from the Philippines spoke English very well. While English remains an official language, more people speak Filipino than English, and this is reflected in a shift of English language proficiency among immigrants to the United States. Data show that many Filipino immigrants today are likely to have LEP.

Figure 2-6: Safe Harbor Languages

Safe Harbor Languages	
1	Spanish
2	Tagalog (incl. Filipino)
3	Vietnamese
4	Chinese (Mandarin and Cantonese)
5	Arabic
6	Korean
7	Persian (incl. Farsi, Dari)
8	Japanese
9	Russian
10	Portuguese
11	Hindi
12	French (incl. Cajun)
13	Khmer
14	Telugu
15	Lao
16	Somali
17	Ukrainian

French/Cajun

French is spoken in Canada; France; and former French colonies in Africa, the Caribbean, and Asia. Cajun is a version of French spoken in Louisiana that has evolved from the French spoken by the state's original settlers, who came from Nova Scotia, Canada. French is the standard written language in Haiti, used in official documents and the education system, and many Haitian refugees have found shelter in the San Diego region.

Persian, Farsi, and Dari

Persian is the name of the language known to English speakers. Farsi and Dari are the names of two distinct accents that Persian speakers use. Generally, Farsi is the name applied to the language spoken in Iran, and Dari is the name applied to the language spoken in Afghanistan. Dari and Farsi speakers can understand each other, and the accents' syntax and sentence structure are the same.

Ukrainian

As described above, many Ukrainians escaping war in spring 2022 have recently arrived in San Diego. Jewish Family Services, a refugee resettlement agency in the county, reported that 400 Ukrainians have resettled in San Diego in the past 12 months, and more are expected. The federal government has agreed to accept up to 100,000 refugees this year and many who cross the border from Mexico will land in San Diego. As of April 1, 2022, an estimated 1,500 Ukrainian speakers were waiting in Tijuana to enter the United States as refugees; although many will settle elsewhere in the country, some are likely to settle in San Diego County.

Other Languages/Not Included—Chaldean

As noted above, the ACS combines Chaldean, Somali, Assyrian, Amharic, and other Afroasiatic languages together into one language "group" containing almost 10,000 individuals with LEP.

Unfortunately, the data specifically related to Chaldean is not very clear. While the DOE dataset shows approximately 1,700 Chaldean-speaking English learners in San Diego County, SANDAG's CBO partner working in the Chaldean community has suggested that there are an extremely small number of people with LEP. Chaldean is sometimes referred to as a language and sometimes as an ethnic, religious, or cultural group, and the language spoken by members of that community is sometimes also referred to as Suret, Neo-Aramaic, or Neo-Assyrian, making data collection and identification of translation and interpretation needs difficult (in fact, the translation/interpretation firm currently used by SANDAG does not have capacity to provide services in these languages).

Given these challenges, Chaldean is not included in the list of SANDAG safe harbor languages at the present time. We will continue to investigate this issue going forward, and—as with all other languages spoken by people with LEP—SANDAG will consider providing language assistance based on demand or if it is warranted by the location or specifics of a project or program.

3. Factor 2: Frequency that Persons with Limited English Proficiency Come in Contact with SANDAG

Information on the frequency that persons with LEP come in contact with SANDAG was assessed based on a survey of employees, follow-up interviews, focus groups made up of individuals with LEP from five language groups, and a review of available data collected by SANDAG on LEP contacts.

Staff Survey and Interviews

There are approximately 400 employees at SANDAG, and all employees were sent an email with a link to an online survey regarding their interactions with individuals with LEP and the resources available for communication. About one fourth, or 103 employees, provided complete responses. The complete survey form is provided in Appendix 1. Among the respondents, about 37% have contact with the public at SANDAG Board of Directors and PAC meetings and 34% at general SANDAG meetings and outreach events. The complete responses are shown in Figure 3-1.

Figure 3-1: In which areas/programs do you have contact with the public? (Check all that apply)
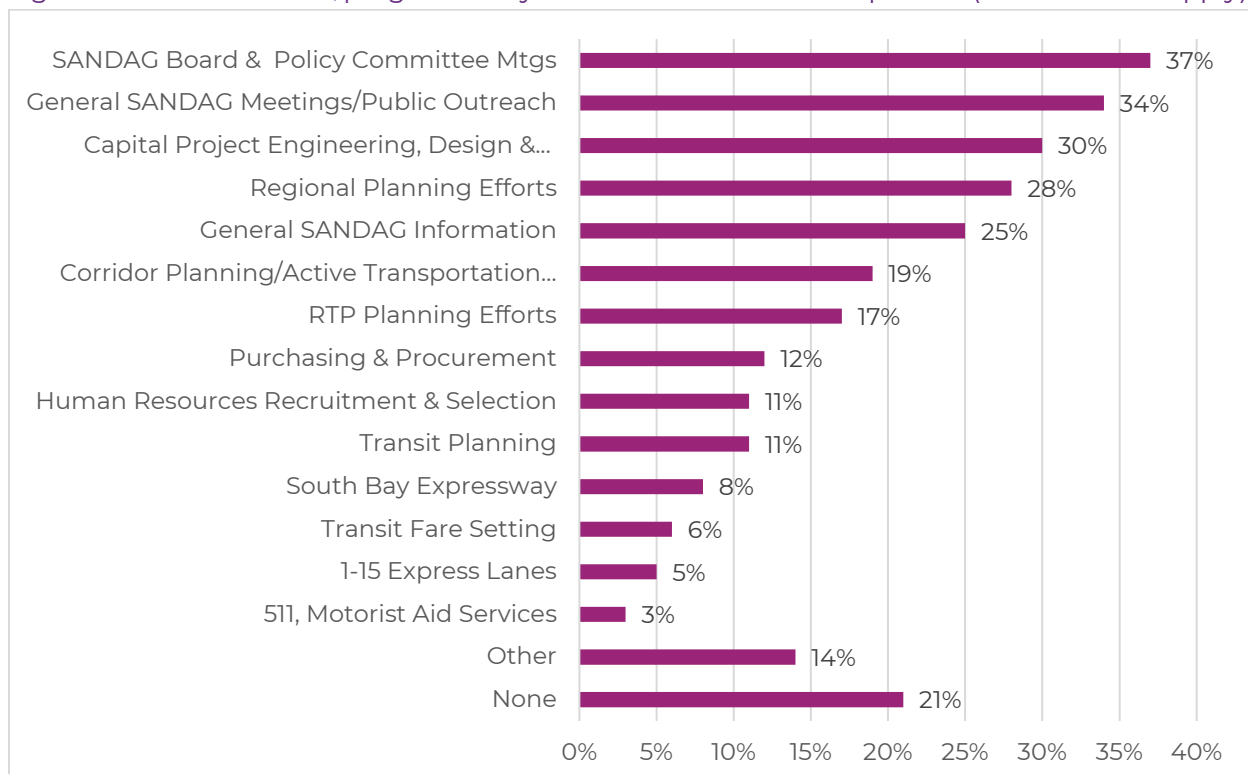
Most of the contacts are in areas that generally receive input or comments on SANDAG plans and proposals. In areas where SANDAG is providing a service—such as 511, toll roads, or Motorist Aid—fewer responses reported contact with the public.

Figure 3-2: How important is it for limited English speakers to have information regarding your area/program to access the programs, projects, and services funded by SANDAG?
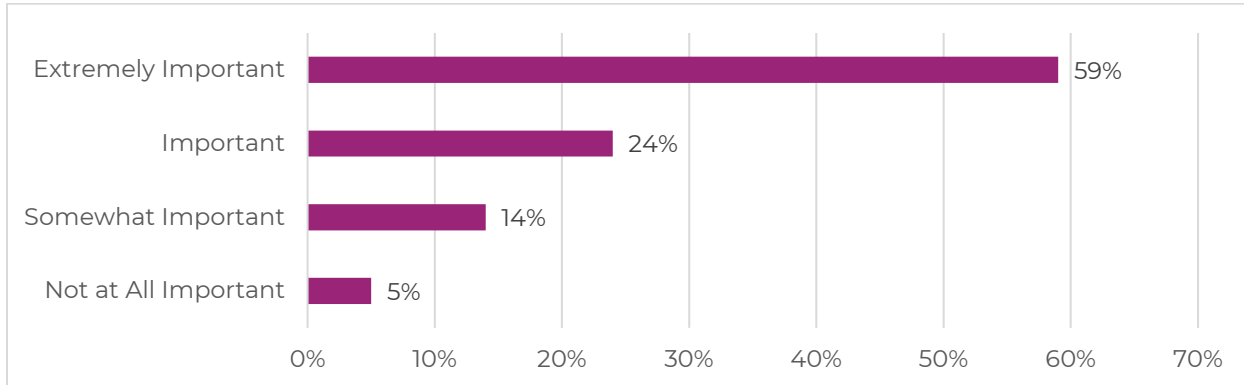
Figure 3-2 shows that most employees believe that providing individuals with LEP information about SANDAG programs, projects, and services is important. Only 5% of respondents believe it is not important for persons with LEP to have information in order to access programs and services.

However, when asked how often they interact with persons who have LEP, a majority (52%) say they rarely or never interact with persons with LEP (Figure 3-3). Further, 23% say they interact only a few times a year. This leaves 32% who interact with individuals with LEP at least monthly.

Figure 3-3: How often do you interact with individuals with Limited English Proficiency?
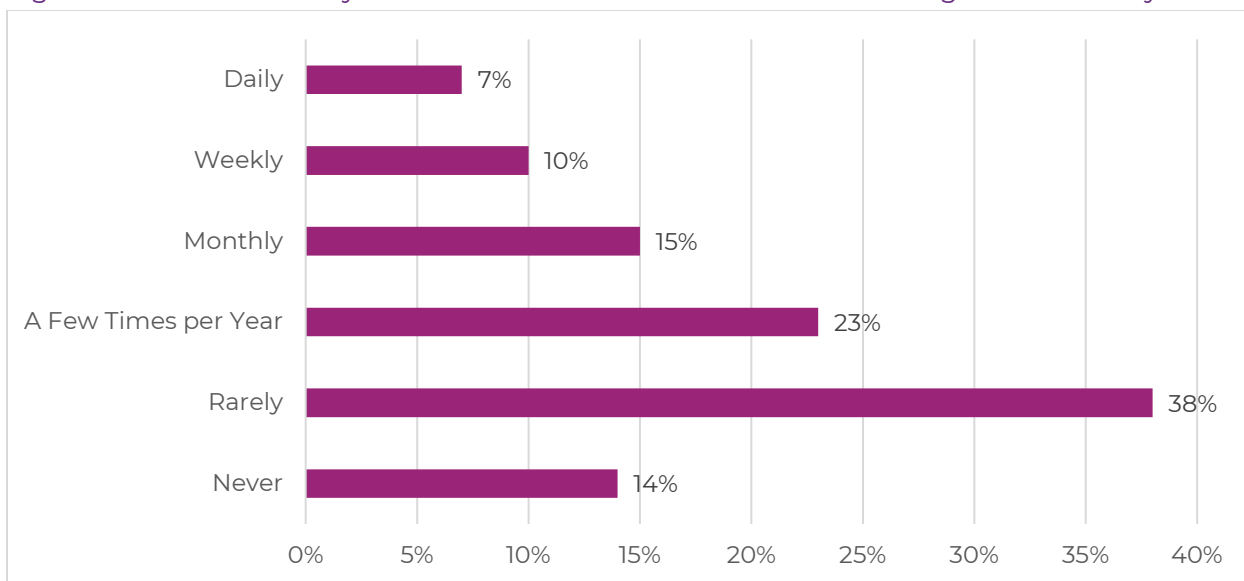
Employees were asked how they usually interact with individuals with LEP (Figure 3-4). The largest percentage report in-person contact as the way they typically interact with individuals with LEP. Virtual platforms, email, and social media are used by 29% to communicate with individuals with LEP, and 21% use a telephone for this purpose.

Figure 3-4: How do you interact with individuals with Limited English Proficiency?

In Person	64%
Virtual Platform (Zoom, Teams, Facetime, etc.)	45%
Email	24%
Phone	23%
Through Social Media (Twitter, Facebook, etc.)	9%
Written Correspondence	8%
Text	3%
Other	7%
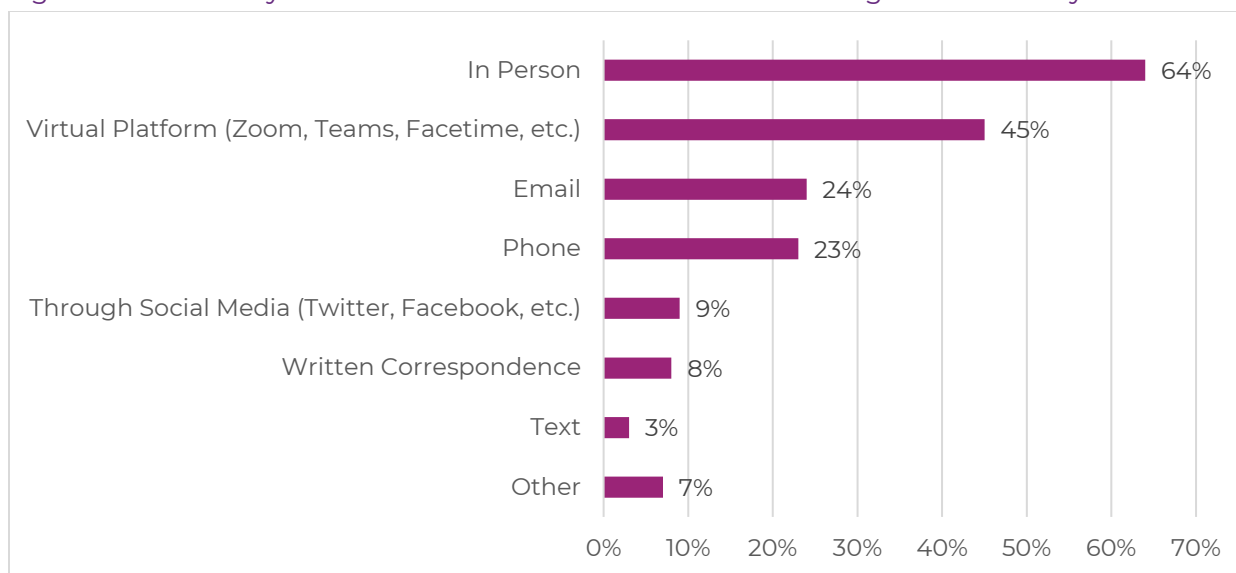
Figure 3-5: What methods do you use to communicate with limited English proficient individuals?

Find a Bilingual Staff Member to Assist	51%
Respond in their Language	33%
Provide Written Information in Their Language	27%
Provide Written Information in English	21%
Use Online Translation Tools such as Google…	20%
Use Sign Language, Hand Signals or Body…	12%
Use I Speak Card to Identify Language First	6%
Use an Over-the-Pohone interpretation on a…	4%
Other	15%
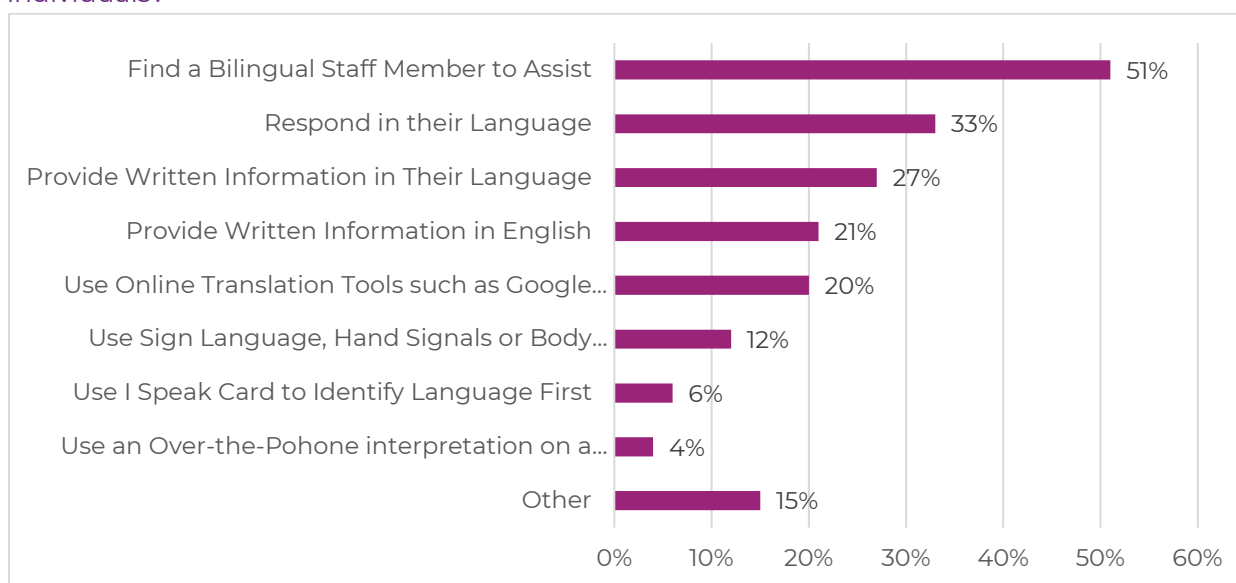
Figure 3-5 shows the most popular method to communicate with persons with LEP is to find a bilingual staff member to assist. A later question shows that there are few bilingual staff members who speak a second language other than Spanish, so this answer is only pertinent for Spanish language assistance. Six percent of respondents say they use the "I Speak" cards available at SANDAG, and only 4% use the over the phone interpretation service available at SANDAG. Twenty-one percent respond to a request by a person with LEP by providing written information in English rather than having materials translated or seeking interpretation assistance.

Employees were then asked about challenges when communicating with individuals who do not speak English very well. The comments are listed in Figure 3-6.

Figure 3-6: What are some of the challenges you face when communicating with individuals who do not speak English very well or not at all?

Ability to translate technical terms to similar meaning in their language

Accessing staff who speak their language

Availability of interpreters

Being able to communicate correct program information in their preferred language

Cannot understand what they are trying to say and cannot speak in their language

Determining which language they speak initially

Each member of public has varying levels of familiarity with planning concepts/vocabulary

Ensuring full understanding of the information I am providing

Ensuring proper translation is ready and available

Ensuring that the information that am providing them is clearly understood

Explain in mannerisms that are universal like a thumbs up or point to objects and directions.

Feeling unable to assist and/or unprepared to assist.

Finding support for a language I may not speak.

Having them understand how to get info on upcoming construction projects.

I am bilingual in Spanish, but one of my coworkers has very limited English conversation skills.

I depend on the translator.

I do not interact with individuals from the public very often, so this isn't a common issue for me.

I don't know how to find tools that SANDAG already has available for translation and interpretation.

I don't speak another language, so it is hard to translate on my own.

I find it challenging to get on the same page efficiently.

I have concerns about the ease of vendors to understand and respond to solicitations

I haven't faced this, but a challenge can be identifying the language being spoken.

I speak Spanish. I can communicate fluently with Spanish speakers.

I want to be able to help them and wish I could refer them to a help line with translation

I worry that I am being disrespectful when using hand signals, basic words, etc.

Identifying when this service is needed.

Inability to communicate decisively and concisely

It can be difficult to clearly convey planning/technical language.

It's difficult when translations are not accurate/fitting

Knowing about SANDAG resources to provide live interpreting services.

Knowing when to plan for interpretation services to be present (always?).

Knowing which meetings and documents to prepare in Spanish. Being sure I understand questions and can follow up.

Learning how to be patient and repeating what they say to confirm what they are saying.

Making sure I have someone who speaks their language and communicate our message.

SANDAG

Making sure nothing gets lost in translation and that the outcome for both parties is understood
Making sure they get the best support/service the need.
My failure to understand Spanish. I have mostly forgotten how to converse
Need more SANDAG staff who speak and resemble the communities we serve.
Not being able to understand questions/requests/input, therefore being able to respond effectively
Not having translation services readily available, not having text/docs in different languages
Not knowing what level of proficiency they're at.
Often individuals use improper terms or slang, so it's important to ID exactly what info they seek.
Overcoming frustration
Technical or jargon terms do not translate well into other languages. You need to explain the terms
The inability to communicate about projects and to understand their questions/input.
The most difficult issue is understanding their question or conversation.
They are shy to ask questions
Translating technical/programmatic information into colloquial Spanish.
Trying to get the information to someone, so they are informed correctly and can get the best use
Trying to help them without giving them any type of misleading information by accident
Trying to understand each other
Understanding and answering questions

Employees were asked to identify what tools they knew were available at SANDAG to assist individuals with LEP. Almost one third (29%) are not aware of any tools at SANDAG. The most frequently cited tool in Figure 3-7 is Google Translate or other web-based translation apps. It is worth noting that in the focus groups with individuals with LEP, use of Google Translate and other web-based translation apps is not well received. Only 10% of respondents are familiar with the over the phone interpretation service available at SANDAG, while a quarter are aware of the availability of bilingual employees.

Figure 3-7: What tools do you have available to provide assistance to people with limited English capabilities? (Multiple answers acceptable)

Tool	Percentage
Google Translate or Other App on Mobile Phone or Computer	38%
Brochure or Instructions Card in Their Language	26%
A List of Bilingual Employees to Call for Assistance	25%
Dedicated Web Content in That Language	14%
Access to an Over-the-Phone Interpretation Service	10%
Dedicated Phone Number in That Language	7%
Other	14%
None	29%
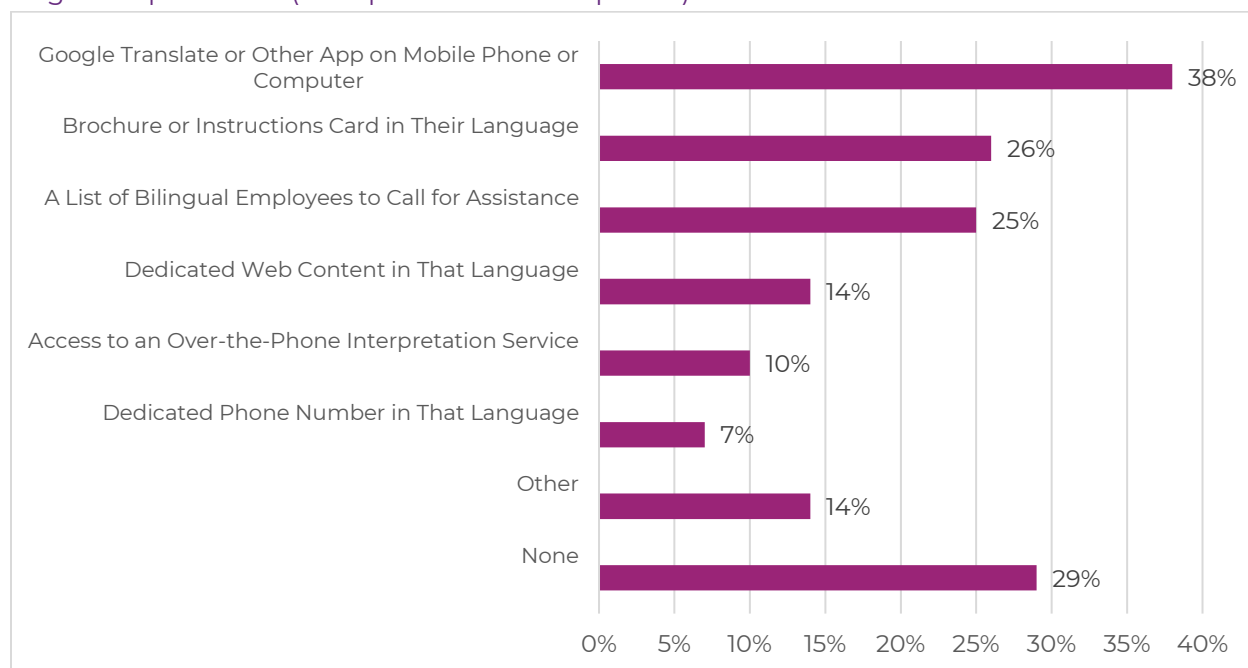
The previous LAP prepared by SANDAG in 2019 offered several possible improvements for communicating with individuals with LEP. For this update, employees were asked if any improvements had been made in the past three years to enable their department to communicate more effectively with individuals with LEP. About one quarter (23%) said that no new initiatives had been taken since 2019, 6% say they sought training in using the over the phone interpretation service, and 4% requested "I Speak" Cards. The most popular responses were to use ethnic media to provide information or to purchase advertising in ethnic or non-English media (14% and 17%, respectively). Eighteen percent of respondents state that other unspecified programs were added to improve effectiveness.

Employees were asked to rank their satisfaction with the existing tools for assisting individuals with LEP. The results, shown in Figure 3-8, show that 30% of respondents rank their satisfaction with a 4 or 5, 47% rank their satisfaction in the middle (level 3), and 24% are dissatisfied with the existing tools for communicating with individuals with LEP.

Figure 3-8: What is your level of satisfaction with existing tools for providing assistance to individuals with Limited English Proficiency on a scale of 1 to 5, with 5 being highest satisfaction?
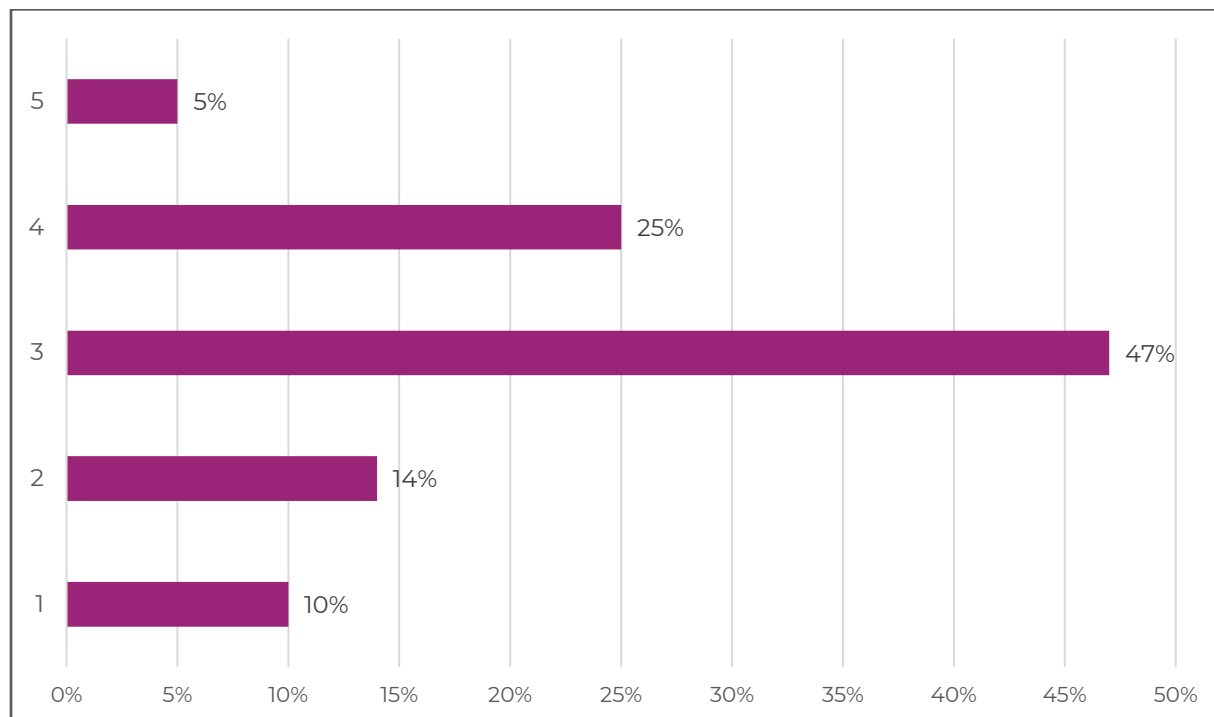
Staff also were asked to identify other tools that could be used to improve communication with individuals with LEP. Figure 3-9 lists the many suggestions that were received. The suggestions marked with an asterisk (*) exist and were not known to the person responding. Better awareness of existing and available tools would be a significant improvement to the language assistance program.

SANDAG created a list of bilingual or multilingual employees, however the list has not been kept up to date and has not been widely circulated. The table in Figure 3-10 shows that although many languages are spoken by employees who responded to the survey, few have more than one or two speakers, and many of the languages identified in Factor 1 (Arabic, Korean, Khmer, and Lao) have no speakers. Even if a list were widely circulated, it would be difficult to keep up to date with staff turnover, and people can be difficult to find because of meetings, vacations, illnesses, lunch breaks, and other reasons. Further, a person's own language skills do not necessarily reflect their ability to provide accurate interpretation.

The distribution of responses by SANDAG departments is shown in Figure 3-11. The data show that 23% of respondents work in the Regional Planning department, and 12% of employees are in that department. The Regional Transportation Services department, which includes Motorist Aid and other services, accounted for just 5% of the survey responses. Some frontline staff, such as tow truck drivers for the Freeway Service Patrol, are not SANDAG employees and were not surveyed. Public Affairs (comprising Government Relations and Communications) is a key department for provision of services for individuals with LEP, and 12% of the responses were from this group. Generally, the responses were proportional to the departments at SANDAG.

Figure 3-9: What other tools would help you to assist customers who speak limited English?

A better sandag.org website with enhanced "page translation" capabilities

A bilingual phone number or website*

A liaison between SANDAG and limited speaking English communities.

A list of colleagues who are bilingual.*

A list of employees who can translate.*

A list of languages and types of availability and willingness to translate for staff members.*

A list of SANDAG employees and the languages they speak*.

A list of SANDAG staff who speak various languages*. Materials in languages common to that area.

A list of what SANDAG/my department already has available would be a good start.

access to advertisement and communication sites where we can post notices in multiple languages*

Access to language tools in languages other than Spanish.

An understanding of the tools not only for Spanish, but other languages.*

Available materials or a list of bilingual staff to contact*

Bi/multilingual individuals, translation guides, knowledge of basic SANDAG related terms

Budget for brochure and marketing materials to be translated and targeted to key populations*

Creating visualizations with high level information

Google translate "stations" in meeting rooms or ability to take them to meetings

Google translate Podium Pc or pc devices to assist, technology

have other materials translated in other languages outside of English and Spanish*

Have translators translate documents to Spanish or other languages*

Having a SANDAG list where staff can identify other staff who are fluent in another language.*

help cards or hiring people who speak in other languages besides English and Spanish*

Hire more diverse, multilingual staff to be present at events.

I do not deal with customers face to face. It would be cool though to have a Spanish class offered

I personally think Google Translate helps enough.

I rarely speak to the general public but I have only had staff help to translate

I think we do a good job with Spanish-speakers at public meetings, but SANDAG staff also need help.

I think we do pretty well with what we have, but more funding earmarked for this effort would help.

I would like a better understanding of what tools are available and when they are appropriate

I would like more direction and consistency on when to include interpretation services at events.

increased pay for bilingual employees who interact with the public in multiple languages

Knowing what tools SANDAG offers free or for cost, verbal and written, how to access them.*

Learn their language

Make it easier to obtain translation services over the phone*.

Maybe have frequently asked questions translated so staff can try if tools aren't there

Maybe our business cards can have a phone number or a link to a site that could assist.

More awareness and information about the tools that are available.*

More bilingual staff

More bilingual staff

more constantly having the tools and translators available or budget for them to be more inclusive

More materials available in languages other than Spanish.

More readily available info on SANDAG's LEP procedures and more access to translation services.*

More translated we content, real-time interpretation of speakers at Board meetings.

More translations for specific program information

My position doesn't interact or communicate with the public.

Not sure beyond making sure that all documents and presentations have translations available.

Recruiting content in different languages specific to the San Diego region.

Something such as google translate that is simple to use.

Standardize all materials to be made available in at least English and Spanish.

The SANDAG tools are good. I do not have any specific suggestions.

Translator*

Updated "I Speak" cards; interpretation resources for LEP callers*

webpages, flyers, on demand SANDAG resources for translation services

Written materials are helpful.

Written materials*

Figure 3-10: Do you speak any of these languages fluently?

Language	Percentage
None	61%
Spanish	26%
French (Including Cajun)	4%
Tagalog or other Filipino Dialects	2%
Mandarin	2%
Hindi	2%
Cantonese	1%
Persian (Including Dari and Farsi)	1%
Japanese	1%
Russian	1%
Arabic	0%
Korean	0%
Portuguese	0%
Khmer	0%
Telugu	0%
Lao	0%
Somali	0%
Chaldean	0%
Other Dialects or Languages not Listed…	4%
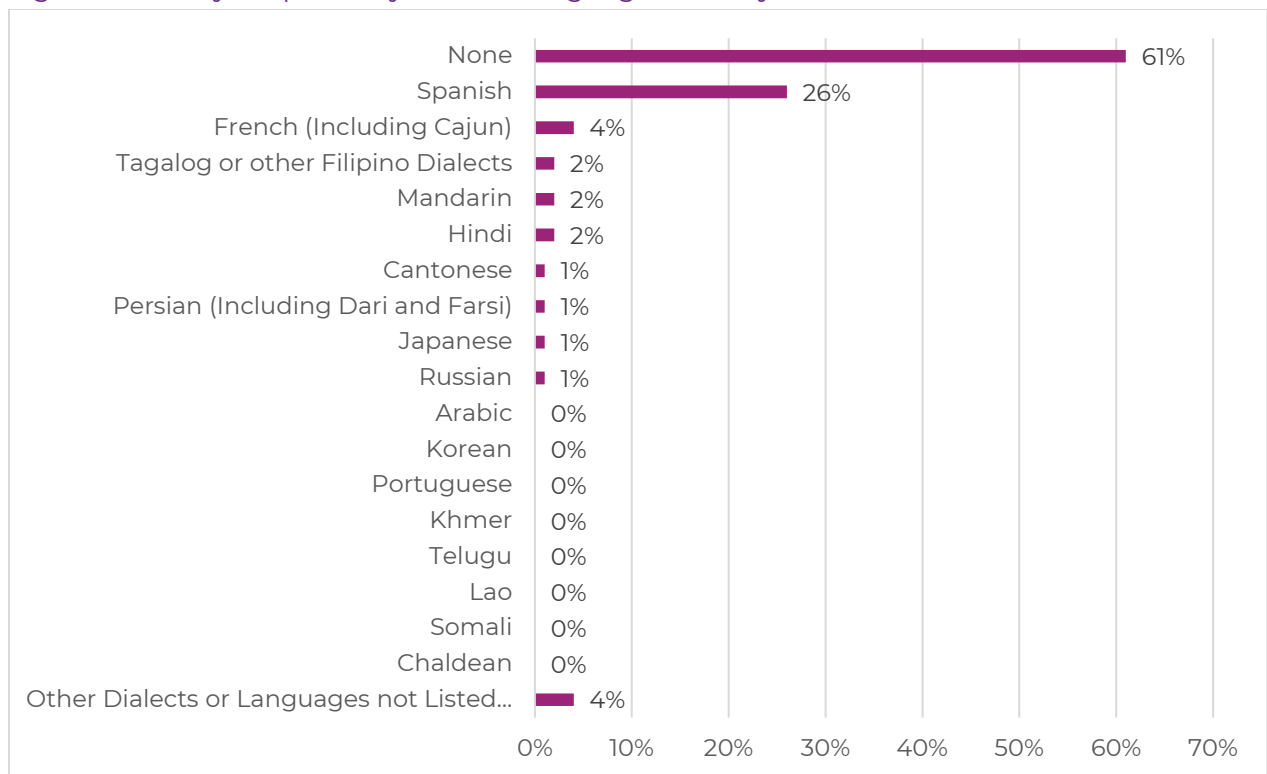
Figure 3-11: Which SANDAG department do you work for?

Department	Percentage
Accounting and Finance	7%
Business Information and Technology	3%
Capital Projects and Programs	9%
Data Science	16%
Executive	1%
Financial Programming, Budgets and Grants	5%
Government Relations and Communications	12%
Office of General Counsel	1%
Office of Independent Auditor	1%
Organizational Effectiveness	19%
Regional Planning	23%
Regional Transportation Services	5%

Focus Groups

SANDAG arranged for focus groups to be convened by the CBOs that have a partnership contract with SANDAG. The CBOs were expected to hold six focus groups with individuals with LEP with Spanish as a first language; two in Arabic; and one each in Vietnamese, Tagalog, and Chinese (Mandarin). One CBO was unable to convene their Spanish language focus group, and as a result, only five Spanish focus groups were held. A $20 gift card incentive was provided to each participant. The focus groups were held in-person or virtually using platforms such as Teams or Zoom. Figure 3-12 shows the name of the CBOs that hosted a focus group and the language of their group.

Figure 3-12: Community-Based Organizations and Focus Group Languages

Community-Based Organization	Focus Group Language
Alliance for Regional Solutions	Spanish
Bayside Community Center	Vietnamese
Casa Familiar	Spanish
City Heights Community Development Corporation	Arabic
Chula Vista Community Collaborative	Spanish
Environmental Health Coalition	Arabic
CSUSM National Latino Research Center	Spanish
Nile Sisters Development Initiative	Arabic
Olivewood Gardens Learning Center	Spanish
Samahan Health Centers	Chinese (Mandarin)
Urban Collaborative Project	Tagalog
Vista Community Clinic	Spanish

The focus groups were held to help understand, from the perspective of individuals with LEP, how frequently individuals with LEP come in contact with SANDAG programs, services, and staff. The language groups were selected based on the prevalence of speakers from the 2019 Factor 1 results and the availability of CBOs that could hold focus groups in those languages.

The questions for the focus groups were specifically targeted to understanding how well individuals with LEP are able to communicate with SANDAG and to highlight any communication issues. Training was provided by GCAP, the consultant SANDAG procured for the LAP update, for the CBO moderators and notetakers. The CBOs were instructed to select participants who have used a SANDAG service, had some contact with SANDAG in the past, or wanted to use a SANDAG service or contact SANDAG in the future.

The results of the focus groups generally showed that, in areas where SANDAG provides a direct service to the public—such as 511, Motorist Aid, or FasTrak—in all language groups, people were not extremely familiar with the services provided and rarely, if ever, used them. However, generally, all were interested in beginning to use these services upon understanding how they work and if the service was available in their language. Many participants were recent immigrants and appeared to have come from countries where government assistance was rare, and they were pleasantly surprised to find that assistance exists here and, in some cases, at no cost to the user.

The features of the 511 system generated some interest as it was explained to the groups, although it seemed like most people found workarounds or by using other sources (such as Google Maps and Google Translate) without actually having to use the service.

One of the areas with direct impact on recent immigrants with limited English is transit fare setting since many new arrivals depend on transit as they are getting established. Again, few participants were aware that SANDAG sets transit fares for the region, and almost none had participated in the outreach for the fare changes. Most seemed unaware that information is provided in multiple languages, and most had never seen notices or heard about changes until implemented.

Few have actually tried to contact SANDAG—partly because they had no need and partly because they are intimidated by contacting a government agency and are unaware that they have the right to receive assistance in their language.

Focus group participants from several of the groups had some contact with SANDAG for the regional planning process. In some cases, the outreach itself was handled by a CBO. Some provided input with the help of interpreters from the CBOs or family members; however, many were intimidated by the language barrier. Few had seen translated documents.

No one in any of the groups had ever used iCommute, and all were unaware of the services available.

SANDAG Data on Contact with Limited English Proficiency Populations

The U.S. DOT and FTA guidance documents suggest that maintaining accurate information about the number and nature of contacts with LEP populations is important. SANDAG has not been consistent in recording LEP contacts in all departments. Records are available for the number of translation and interpretation requests made to the Public Affairs (previously Strategic Communications) department. The Toll Operations Center has data on the number of calls handled by English and Spanish telephone queues. In 2021, almost 10,700 calls (12% of all calls) to the call center were handled in Spanish. Data also are available for the number of minutes of interpretation requested, by language, for the over the phone interpretation service.

The Public Affairs department received about 200 requests for translation/interpretation in the most recent one-year period. The breakdown by language is shown in Figure 3-13. In addition, consultants working on projects for SANDAG also did translations.

Figure 3-13: Translation Requests by Language

Language	% of Translation Requests
Spanish	75.2%
Arabic	5.8%
Tagalog	5.8%
Farsi	3.6%
Chinese	2.2%
Korean	2.2%
Vietnamese	2.2%
Somali	1.5%
Pashtu	0.7%
English	0.7%

Simultaneous Spanish interpretation has been available at Board of Directors, PAC, and several other standing committees since May 2021. A record is not kept regarding the number of times members of the public speak in Spanish. The Clerk of the Board does not report any instances of requests for interpretation into languages other than Spanish. As of May 2022, no mention is being made in the agendas about the availability of simultaneous translation services.

Meeting agendas state that agenda materials can be made available in alternative languages with advance notice. The same notice is repeated in Spanish and Chinese but has not been provided in other languages such as Arabic, Vietnamese, or Tagalog.

Counts are not available for the number of documents printed in alternative languages or the number of pages added to documents for translated pages, and it is not known how much resources were spent on this effort.

Front-desk reception at 401 B Street does not keep a tally of calls received or persons arriving unannounced who require language assistance. Anecdotal information provided by reception indicates that fewer than 10 contacts per year are made, all in Spanish, with none in any other language. It is not known if friends or family provided interpretation assistance for any person contacting SANDAG. The Toll Operations Center has a separate telephone queue for Spanish customers staffed by bilingual operators.

There has been no recent tracking of the number of individuals with LEP who attend public outreach events. There also is no estimate of the reach of publications or electronic media in alternative languages. Based on the anecdotal information received from the focus groups, SANDAG communications are not being heard or seen widely in LEP communities.

Going forward, tracking should be implemented for the efforts mentioned above for which no data are available.

Factor 2 Conclusions

The greatest number of contacts with individuals with LEP are in Spanish, which is consistent with the findings of Factor 1 and reflective of the cross-border planning relationship with and

geographic proximity to Mexico. The absence of data showing contact with other language groups appears largely due to people not being aware of SANDAG, its role, and the services it provides. Part of this issue is that many recent immigrants and non-English speakers come from nations that do not have organizations like SANDAG that provide services such as FasTrak, or no-cost services such as 511, the Freeway Service Patrol, or highway call boxes. Greater awareness of SANDAG's role and services in the LEP community will increase contacts.

4. Factor 3: Nature and Importance of Contact with SANDAG to Persons with Limited English Proficiency

As already noted, SANDAG provides services, administers programs, and builds projects which have a direct impact on the public, including individuals with LEP. Accordingly, SANDAG's planning activities rely on significant public input.

Examples of such programs include setting fares for public transit and setting toll rates and rules for FasTrak facilities. Major transportation decisions can have a significant impact on individuals with LEP, although the impact of decisions made today on future corridors, modes, or terminals, and hubs may not be felt in the community for many years after being discussed and decided by the Board of Directors. SANDAG's regional planning efforts are critical to the livability of the region, and input from the public is needed, however the impact of the input received may not be immediately seen.

The 511 system provides information to the public that supplements the data available from other sources (e.g., traffic and transit information) and emergency response services through the call box program and Freeway Service Patrol that is not available from any other source.

SANDAG designs and builds active transportation projects, major transit infrastructure, and highway projects. Those projects require public input during the environmental and planning stages and involve the posting of safety warnings and construction notices, all of which should be communicated to LEP populations.

Some specialized programs within SANDAG have limited contact with individuals with LEP because they are designed primarily to work with businesses or other government agencies. Examples of such programs could include some aspects of iCommute, the Service Bureau, ARJIS and the criminal justice program. Nonetheless, even though these functions may not serve individuals with LEP directly, the products they produce or provide may be of interest to individuals with LEP.

Focus Groups

Focus groups for individuals with LEP sought to identify the importance of SANDAG in their lives. There were no control groups of non-LEP speakers with which to compare the results of the LEP focus groups; having such a control group would have made it easier to determine whether SANDAG was more or less important to individuals with LEP than to persons who speak English very well.

The results from the focus groups generally found a poor level of awareness of SANDAG programs and little contact with the agency. Most people were unaware they have a right to communicate with SANDAG in their native languages, and many stated they felt intimidated to communicate with a government agency because of their poor English. Spanish speakers seemed to be more aware of SANDAG programs and were more willing to communicate with the agency than members of other language groups.

The focus groups were asked to discuss seven specific areas:

- SANDAG meetings; transportation and regional planning
- Public transit fare setting

- 511 website and phone system
- Motorist Aid program
- iCommute
- FasTrak
- General SANDAG communications

A synopsis of the discussion by topic is provided in the following sections. The focus group moderator's guide and consent form are provided in Appendix 2.

SANDAG Meetings; Transportation and Regional Planning

Through the regional planning outreach process, SANDAG was able to connect with people in the major language groups, although not everyone who participated in the focus groups took part in or was aware of that activity. CBOs were able to generate interest in the process, and that supported SANDAG's efforts to reach disadvantaged populations. Many focus group participants noted the lack of translated written materials, however, and some said they were too intimidated by the language barrier to participate.

On the one hand, the level of participation indicated the LEP population seemed to find the regional planning process outreach effort to be important. On the other hand, few participants attended or took part in regular SANDAG Board or PAC meetings. Generally, participants believed SANDAG was not providing enough resources in their native languages.

Public Transit Fare Setting

Few participants in the focus groups were aware SANDAG sets the fares for all public transit in the region, and fewer actually participated in the outreach programs for fare changes, despite the importance of transit fare changes to many individuals with LEP. Many recent immigrants may have come from countries where outreach is not conducted for transit fare changes (or other government programs) and may not be aware they can provide input or comment on proposals. They may not have recognized the request for input or seen notices in their native languages. The Spanish language participants who were unaware of the SANDAG role expressed a strong interest in participating in the future.

511 Website and Phone System

There was little knowledge about the 511 system. Usage seemed to be limited to emergencies (for Freeway Service Patrol and highway call boxes). It was reported that there were long waits for a Spanish-speaking telephone operator. When the system was explained, there was interest, however, the lack of other languages on the phone system would make it almost impossible for people who do not speak English or Spanish to use. Alternatives such as Google Maps and content provided by the local transit agencies (MTS and NCTD) offer comparable transit and traffic information with similar levels of language support. Access to the Motorist Aid Services appears to be the most important and unique aspect of the 511 San Diego system.

Motorist Aid Services Program

Few participants knew about the Freeway Service Patrol or highway call boxes. However, when the service was explained, the participants felt it was an important service that should be more widely advertised to individuals with LEP. There were some who had limited experience with using the service, and participants noted they encountered long wait times for assistance in Spanish. Some recent immigrants thought the Freeway Service Patrol was a form of police and something to avoid, rather than for a service they may turn to for help.

It was confirmed that the signs along freeways in San Diego County advising motorists of roadside assistance are in unilingual English (see Figure 4-1, left photo) and do not use pictograms, which may help explain the lack of familiarity with the service. This contrasts with the logo on the vehicles (see Figure 4-1, right photo), which is more self-explanatory.

Figure 4-1: Freeway Sign for Motor Assistance and Tow Truck Logo

Figure 4-2 shows that while signs for the call boxes (on the left) include a pictogram for a phone, they provide no information on the purpose of the call box, either in English or with a pictogram.

The unilingual call box sign in San Diego County is contrasted with a typical European sign (Figure 4-2, right), which uses the universal phrase, SOS, to identify that call boxes provide help.

Figure 4-2: San Diego Call Box Sign and Example of European Call Box Sign

iCommute

None of the participants were aware of the iCommute program. This lack of awareness was uniform across all languages. When the program was explained, there was some interest, but overall, it did not seem to be an important service for the participants in the focus groups. The impressions may have been quite different if any of the participants were specifically interested in joining a vanpool or participating in another commuter-related service.

FasTrak

There was limited familiarity with FasTrak (I-15 Express Lanes and South Bay Expressway/SR 125). Users of I-15 had heard of FasTrak but did not know what it was about or how to acquire a transponder. Several participants said they would be interested in getting a transponder if the information was available in their language. Some thought the signs (see Figure 4-3) on the freeway itself were for trucks because they were not highly informative and did not use pictograms or other languages. In Figure 4-4, examples are provided of European signs for electronic tolling, incorporating pictograms that are somewhat more self-explanatory without using a written language.

Figure 4-3: South Bay Expressway FasTrak Signage

Figure 4-4: Examples of European Signs for Electronic Tolling

General SANDAG Communications

Only a few of the participants ever tried to call or visit the SANDAG offices. When they attended a Board meeting, they used the interpretation service (Spanish). A Filipino participant attended a Board meeting and understood English enough not to need any interpretation, and noted only a Spanish interpreter was on site. Participants were not aware an interpreter for Tagalog could be provided upon advance request, likely because there was no notice of such availability on the agenda.

Note on Focus Groups

The input from the focus groups indicated that being able to participate in Board activities and public meetings and to request motorist aid were the most important points of communications with SANDAG. The focus group process could be improved in the future by having the groups facilitated by consultants preparing the study or including professional facilitators who can draw out more information. The selection of respondents should also be drawn from persons who have had contact with SANDAG. The CBOs were asked to engage people who were familiar or had contact with SANDAG, however, upon reviewing the results, it appears few had any contact with SANDAG or experience with SANDAG programs. If the same process is used in the future, then a control focus group of English speakers might also be included to determine whether the responses and level of contact of the individuals with LEP are different from those of non-LEP individuals.

Factor 3 Conclusions

The individuals who participated in the focus groups placed a high level of importance on being able to communicate with elected representatives though the Board and policy committees. Transit riders also felt it was important to be able to comment on fare changes. Even though few had used Motorist Aid, or even knew of its existence, the individuals participating in the focus groups found the Motorist Aid Services, including the Freeway Service Patrol and call boxes, to be particularly important. The 511 system, except for requesting Motorist Aid, was not seen as particularly important because more easily accessible traffic and transit information alternatives exist. iCommute was not viewed as important because none of the participants had a need for the services provided.

5. Factor 4: Resources Available to SANDAG and Estimated Costs

The U.S. DOT Guidance on LEP recognizes the level of language assistance provided by agencies will differ based on the size of the establishment and the resources or budget available. The guidance directs agencies to take reasonable steps to provide language access, but if the costs substantially exceed the benefits, additional actions may not be necessary. The guidance points out costs can be minimized through technology, reasonable business practices, sharing of language assistance materials, and partnering with advocacy or community groups. SANDAG has embraced new technology (e.g., Google Translate), adopted reasonable business practices (e.g., Toll Operations Customer Service Center bilingual resources), and incorporated partnering with community groups (e.g., Regional Plan Social Equity Working Group and CBO partners).

Resources for Language Assistance at SANDAG

The total resources dedicated to supporting individuals with LEP is not available in a single, dedicated location. Typical language assistance costs include the items listed below; actual costs are only available for the items marked with an asterisk (*):

- One full-time, Spanish-speaking, translation/interpretation coordinator*

- Translations sent to outside translator by SANDAG translation/interpretation coordinator*

- Time spent by bilingual employees providing on-the-spot interpretation or reviewing translated documents

- Printing of separate or additional documents/items in Spanish and other languages

- Over the phone interpretation services*

- Total advertising in foreign languages in print and electronic media

- Translation/interpretation costs by consultants working on SANDAG projects*

- Interpretation at public outreach events and other public meetings*

- Interpretation at Board and PAC meetings*

- CBO partner relationships, which provide more engagement with LEP populations

Providing services for individuals with LEP is not a single-cost item in the budget, and the costs are not in a single department. Some costs (e.g., printing of multilingual documents) are not separately tracked. Specific projects, including planning and capital projects, may also spend resources to provide communications in other languages, but there is no tally of the costs.

Identifying Language Assistance Expenditures

A number of resources point to where else SANDAG might have assigned or spent funds for language assistance.

The SANDAG Overall Work Program (OWP) for FY 2022 includes a total of $12.375 million for contracted services, of which $1.682 million was allocated to support public engagement and communications. In the actual budget document, one contract had a specific line item for Spanish interpretation services ($6,000), and many of the contracts also contained translation and interpretation services requirements for Spanish and other languages. In addition to translation and interpretation, there are costs for printing separate or additional pages for additional languages in reports and plans.

Chapter 1 of the FY 2022 OWP includes a statement on public involvement, and refers to the Commitment to Equity statement and the need to eliminate disparities and include opportunities for everyone. There is, however, no mention of any support for providing language assistance in social media, print and electronic media, or websites.

Board Policy No. 25, Public Participation Plan policy, includes specific requirements for ensuring public participation, such as measures that reach out to individuals who have LEP. Public involvement program strategies are found in several specific OWP task descriptions, and the need for providing language assistance activities is identified in one, Public Involvement. In this category, about 15% of $610,000 is dedicated to communications for underrepresented communities, including low-income communities, people of color, persons with disabilities, older adults, tribal nations, and individuals with LEP. That includes production of materials in various other languages.

Content in other languages is produced for many projects, however, there is no acknowledgement of such tasks in the budget or specific budget allocation. Other budget elements also make no mention of the use of additional languages for any print, digital, and broadcast advertising copy, videos, public-facing websites, social media content, email blasts, or other forms of engagement.

The OWP for Government Relations likely includes some costs for language-related activities because it includes a cross-border working group and relations with agencies in Mexico. Major projects such as Otay Mesa East Crossing and Central Mobility Hub also include translation, interpretation, and media costs for other languages. iCommute has a contract with an external consultant for outreach, and the contact may include expenses directly related to individuals with LEP. The Office of Diversity and Equity has two OWPs which may include costs associated with language assistance initiatives.

A new cost code for translation and interpretation expenditures was created in the budget tracking system, and took effect on July 1, 2022; it is anticipated that this will streamline tracking of these expenses.

Assessing Language Assistance Expenditures

One possible means of measuring the reasonableness of expenditures on language assistance is to compare the percentage of funds expended with the percentage of LEP population in the SANDAG service area.

Individuals with LEP constitute about 13% of the total population of San Diego County. As a rough measure, one would expect at least 13% of the total communications budget to be spent on communicating with individuals with LEP. Because costs such as translation and interpretation increase the costs for communications to individuals with LEP, it would be reasonable to assume costs could be greater than just 13% of the total communications budget.

In the 2021 OWP, the total budget for external support and communications is $6.76 million, of which $1.06 million is directly allocated to public involvement and marketing. Known costs associated with meeting the requirement to serve LEP individuals are limited; they include, at a minimum:

Estimated annual cost for on-call contract for translation and interpretation	$117,000
Annual fully burdened cost for in-house translator and language coordinator	$115,000
Estimated cost: advertisements in foreign language media, printing, and miscellaneous*	$50,000
Total estimated annual costs for providing service for individuals with LEP	$282,000

Exact figures are not available; this is a rough estimate of costs.

With direct language assistance costs estimated to be about $282,000, the expenditure is equivalent to about 27% of the direct communications costs, excluding project communications costs, which are budgeted separately. If more project communications costs are known and included the percentage for LEP communications would increase. Using this method, it appears that percentage of costs associated with providing service to individuals with LEP exceeds the percentage of LEP population in San Diego County. This is a rough indication that SANDAG resources are reasonable.

Factor 4 Conclusions

The federal guidance on providing service to individuals with LEP encourages agencies to provide as many services as reasonable to as many language groups as possible who meet the safe harbor threshold. The guidance leaves it to local decision makers to determine the appropriate level of service and determine whether the costs are reasonable and sustainable. To assess whether the costs and resources are reasonable, the expenses for communications with persons with LEP should be tracked, which is not currently happening at SANDAG. Without those records, it is impossible to positively determine whether the resources and level of effort for meeting the challenge of providing services to populations LEP are reasonable.

It is recommended that the financial record-keeping system be modified to capture costs associated with actual (and future) expenses in categories such as:

- Translation and interpretation services
- In-house translators and language coordination
- Advertising in foreign language media

- Over the phone interpretation service

- Printing documents in other languages

- Pay differential for bilingual employees (under consideration)

- Capital/leasing costs associated with multilingual Interactive Voice Recognition (IVR) systems

- Capital/leasing costs for interpretation hardware

Keeping good records of resources allocated to communicating with individuals with LEP is a best practice that will ensure the agency has documentation of expenditures which support SANDAG's commitment to providing language assistance.

As noted above, using a simple comparison between the percentage of the LEP population in San Diego County and the percentage of known budget committed to language assistance activities, SANDAG is meeting the standard suggested in the U.S. DOT guidance. The next section, the LAP, will review measures being taken and determine whether alternative or additional actions are needed.

6. Language Assistance Plan

Introduction

It is SANDAG's policy to provide timely, meaningful access for persons with LEP to its services and decision-making processes. SANDAG communicates with individuals with LEP in person and over virtual platforms, over the phone, in writing, and through digital media as provided in this LAP. The LAP will be updated every three to five years to ensure alignment with the most recent Four Factor Analysis, the SANDAG Equity Action Plan, and any significant changes in the SANDAG Title VI Program.

The LAP is an important component of SANDAG's Commitment to Equity. An effective LAP will help ensure historically underserved, systemically marginalized, linguistically isolated groups can receive the full benefit of SANDAG programs, services, and facilities, and can participate in public engagement opportunities conducted by SANDAG. SANDAG is committed to creating a region where every person, regardless of the language they speak, can thrive.

This LAP for SANDAG has seven elements:

1. Prioritize safe harbor languages to provide appropriate language assistance
2. Identify persons, departments, and staff advisory group language assistance responsibilities
3. Identify vital documents
4. Determine high-level and program-specific language assistance measures, including existing and proposed
5. Consider efforts to increase availability of bilingual employees
6. Provide training for staff on language assistance requirements
7. Advocate internally and externally to enable SANDAG to better serve individuals with LEP

Each of these elements is described in the following sections.

Safe Harbor Languages and Language Priority Groups

The Four Factor Analysis identified 17 languages (including two dialects of Chinese) that meet the safe harbor threshold. The number of persons ranged from more than 245,000 Spanish speakers to an estimated 1,000 Ukrainian speakers. Spanish is the language most spoken by persons with LEP and—given factors such as the historical role of Spanish in the region, the close relationship with Mexico, and cross border flows of people—Spanish has a unique importance for SANDAG. Four more languages—Chinese, Tagalog, Vietnamese, and Arabic—have significant populations of LEP persons (15,000–30,000 individuals). There are 12 additional language groups consisting of between 1,000 and 7,500 individuals that meet the threshold for safe harbor designation. Language groups with fewer than 1,000 LEP individuals in San Diego County do not meet the requirement for safe harbor designation.

The wide range in the sizes of the language group populations and the historical and geographic proximity issues support the use of priority designations to develop language assistance measures. (Note that while Chinese is listed as one language in the safe harbor languages list, Mandarin (for oral communication) and Simplified (for written) are designated in Language Priority Group 2 and Cantonese and Traditional are designated in Language Priority Group 3.)

Figure 6-1: Language Priority Groups

Priority 1	Priority 2	Priority 3
Spanish	Tagalog/Filipino Vietnamese Chinese: Mandarin (oral); Simplified (written) Arabic	Chinese: Cantonese (oral); Traditional (written) Korean Persian Japanese Russian Portuguese Hindi French (incl. Cajun) Khmer Telugu Lao Somali Ukrainian

Departments and Staff Responsibilities

Implementation and monitoring of this plan is the responsibility of the Organization Effectiveness (OE) Department. The Office of Diversity and Equity, within OE, is responsible for compliance activities related to providing language assistance under the Title VI mandate, including updating the Four Factor Analysis and LAP, and developing and delivering Social Equity training. Other staff in OE have important responsibilities for implementing the LAP, including providing language assistance resources to project managers and coordinating translation and interpretation requests. OE staff partner closely with the Public Affairs Department responsible for developing outreach and public information and materials.

An interdepartmental working group was created to provide input to this LAP update. It is recommended that, going forward, the knowledge and experiences of that group be tapped to provide employee input on language assistance issues.

Vital Documents

The U.S. DOT LEP Guidance requires each agency to identify a list of vital documents that must be translated into the languages identified in the Four Factor Analysis. The U.S. DOT guidance states recipients are not required to provide written translations of vital documents for all safe harbor languages, however, if they do so, the FTA will consider it to be strong evidence of compliance with the recipient's written translation obligations. SANDAG has divided the 17 languages into three priority groups, as described above, and identified how the language groups prioritization shall be applied to the translation of vital documents. Language groups will be reevaluated when the LAP is updated.

Vital Document Identification

The determination of the *vital* status of a document is an ongoing process. Documents will evolve, and so will their importance. Thus, document classification is divided into the three tiers, as follows:

Tier 1 Documents

Tier 1 documents are the highest priority. They are considered vital documents and include documents and media that:

- Provide notice of a person's rights under Title VI of the Civil Rights Act and the processes by which complaints can be filed

- Allow persons with LEP to participate in the core functions of SANDAG, including providing public comment and accessing services

- Provide executive summaries of the Regional Plan and Title VI Program updates

- Provide notices on public safety or construction closures

All Tier 1 documents will be translated manually for Spanish (Priority Group 1) and Priority Group 2 languages. Translations for Tier 1 documents for languages in Priority Group 3 will be available upon request or otherwise as deemed necessary to ensure meaningful access to SANDAG's programs and activities.

Examples of Tier 1 documents include:

- Board Policies No. 07 (Equal Employment Opportunity (EEO) and Disadvantaged Business Enterprise (DBE) Programs) and No. 09 (Discrimination Complaint Procedures), and associated brochures, notices, and forms

- Fare change proposals and notices

- FasTrak user information including customer applications, agreements, terms and conditions, and instructions for how to access services

- Freeway Service Patrol user information, including how to access services

- Public safety and access information triggered by major regional planning efforts such as GO by BIKE and the Regional Plan

- Information about ballot measures that concern funding for transportation and mobility

Tier 2 Documents

Tier 2 documents include documents and media that enhance a customer's experience or encourage involvement in the planning process. All Tier 2 documents will be manually translated for language Priority Group 1 and be available upon request or otherwise as deemed necessary to ensure meaningful access to SANDAG's programs and activities for Priority Groups 2 and 3.

Examples of Tier 2 documents include:

- Project fact sheets and other collateral pieces that are not deemed instructions for use; including maps and copy on images

- General Freeway Service Patrol, South Bay Expressway, and FasTrak information that is not deemed to be critical user information, including marketing materials and additional collateral and complete promotion terms and conditions

- 511 user information including how to access services

- Other civil rights policies such as the American with Disabilities Act policies

Tier 3 Documents

Tier 3 includes information that will enhance the role that all individuals, regardless of language ability, might have in SANDAG planning efforts, services, and operations. For Tier 3, manual translations will be available for all three priority groups upon request or otherwise as deemed necessary to ensure meaningful access to SANDAG's programs and activities. Examples of Tier 3 documents include:

- Information regarding SANDAG Board of Directors, PAC, SSTAC and any other meetings subject to the Brown Act, including agendas and minutes

- Information regarding regional, corridor, and transit fare efforts, including study documents and reports

- General SANDAG information, including marketing materials and collateral

- General information regarding major regional planning efforts such as GO by BIKE and the Regional Plan

- General project and program information, including about 511, iCommute, Freeway Service Patrol, South Bay Expressway, and FasTrak, including marketing materials, additional collateral outside of instructions for use, and complete promotion terms and conditions

The form these translations will take should be determined on a case-by-case basis as the documents are published. In many cases, translation of an abbreviated summary document might be most appropriate. In some cases, a notice of language assistance might be sufficient. Upon request, and depending on available resources, a decision may be made to provide manual translation of specific documents in this tier for language Priority Groups 1, 2, and 3.

For each tier, SANDAG will assess documents against available resources or alternatives.

Language Assistance Measures

Existing and proposed language assistance measures at SANDAG are listed below. High level initiatives are followed by program-specific initiatives. In some cases, initiatives are shown which have been previously recommended and are not yet implemented (or fully implemented); in these cases, efforts are underway to implement promptly.

General SANDAG Communications

- Bilingual English/Spanish employees provide assistance on the phone and in person

- All staff have access to over the phone interpretation service

- "I Speak" cards for staff having public or customer contact

- In-house certified English/Spanish translator, and internal translation review by native Spanish speakers

- SANDAG webpages for many programs fully translated into Spanish; work toward ensuring that clicking on links within Spanish-language content does not lead to English-only content

- Google Translate toolbar on each webpage; work toward standardization of location and functionality

- Non-discrimination notice, including notice of Title VI rights and complaint procedures, and notice of availability of language assistance included in Board policies and on website

- Grant agreements contain language to ensure language assistance requirements are met by grantees

- On-call contracts for document translation and interpretation services

- Translation and interpretation tracking system

- Dedicated cost code streamlines tracking interpretation and translation expenditures in the budget system

- Spanish translation style guide and Spanish language glossary

- Internal intranet provides information about translation and interpretation services, including procedures, language assistance resources, vital documents guidelines, and more to all employees

Oral Interpretation

Oral interpretation services are an important element of language assistance. This effort can be improved by:

- Providing instructions and training on the use of over the phone interpretation service to all employees, including information about how to get interpretation during a public outreach event

- Ensuring front-line positions such as reception, tow truck drivers, and call centers are staffed with fluent bilingual English/Spanish employees

- Evaluating delays in responding to requests for service (general reception, motorist aid, 511, operations call center, iCommute) in languages other than English

- Providing notices on Board, policy committee, SSTAC, and other relevant agendas about the availability of Spanish simultaneous interpretation and means to request in other languages
- Developing protocols to ensure that bilingual employees are available at external events

Written Translation

The written translation services provided by SANDAG include:

- The SANDAG non-discrimination notice, including notice of Title VI rights and complaint procedure, is translated into Language Priority Groups 1 and 2 and available for use in a variety of written and digital materials

- Notice of the availability of language assistance is translated into all Language Priority Groups; in conjunction with the Free Language Assistance Notice (see below), it provides the means for persons with LEP to easily identify the availability of language assistance

- An icon which identifies toolbars, QR codes, links, or statements on language access has been developed and should be implemented wherever possible

- Manually translating documents and materials into languages other than those identified in the Tiers (above) when a project is located in a community with a large number of persons with LEP
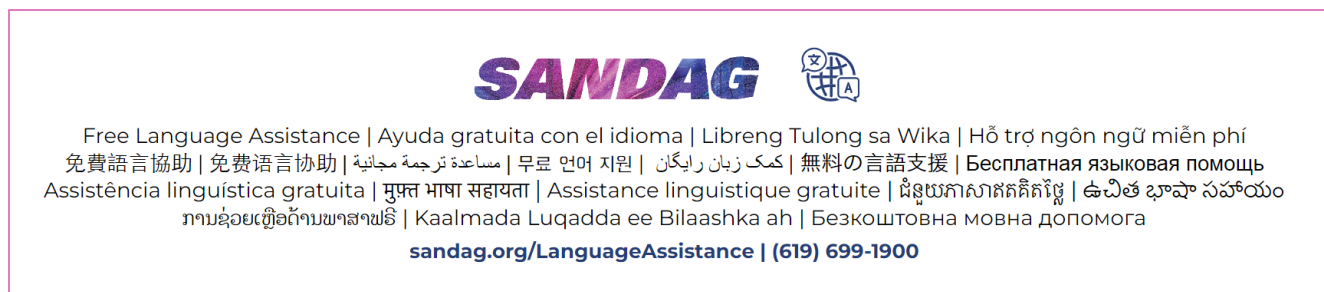
Language Assistance Toolkit

SANDAG language assistance materials are collected and made available to all employees in one centralized location. This Language Assistance Toolkit contains the resources staff, especially project managers, are likely to need, including existing internal document translation and interpretation procedures (the Language Assistance Guidelines, SANDAG Translation Procedures, and Translation and Interpretation Request Form). The Toolkit should be reviewed, updated, and expanded regularly, distributed to project managers and other staff, and located in an easy to find section of the SANDAG intranet (SharePoint). Additional materials, such as training materials and videos, language glossaries, instructions for using the over the phone interpretation service, should be added to the Toolkit as they are developed.

Free Language Assistance Notice

SANDAG has made significant strides to provide language access through use of bilingual employees, over the phone interpretation services, and translated documents. To ensure all those with LEP understand the availability of these various efforts, the LAP proposes to implement a Free Language Assistance text block and image. This notice will be added to written content—both printed and digital—to notify the public that language assistance is available in all the safe harbor languages. The notice will contain a phone number for contacting SANDAG, and staff answering this number will use the over the phone interpretation service, if needed, to communicate with the caller. The notice will also direct an interested person to a dedicated webpage containing details about SANDAG's commitment to provide language assistance, translated content, and information about how to use available translation tools. Going forward, a QR code could be added to the Free Language Assistance notice to streamline access to this website.

Figure 6-2: SANDAG Free Language Assistance Notice

SANDAG

Free Language Assistance | Ayuda gratuita con el idioma | Libreng Tulong sa Wika | Hỗ trợ ngôn ngữ miễn phí
免費語言協助 | 免费语言协助 | مساعدة ترجمة مجانية | 무료 언어 지원 | کمک زبان رایگان | 無料の言語支援 | Бесплатная языковая помощь
Assistência linguística gratuita | मुफ्त भाषा सहायता | Assistance linguistique gratuite | ជំនួយភាសាឥតគិតថ្លៃ | ఉచిత భాషా సహాయం
ການຊ່ວຍເຫຼືອດ້ານພາສາຟຣີ | Kaalmada Luqadda ee Bilaashka ah | Безкоштовна мовна допомога
sandag.org/LanguageAssistance | (619) 699-1900

Digital Information

Digital media is an increasingly important means of communicating with persons with LEP. Widespread access to smart phones and computers has made it easier and faster to get information into the hands of the public.

LEP access to SANDAG digital media resources has not grown as quickly as access to information for persons who can speak English. Examples of areas with opportunities for improvement are web pages and social media, especially given tools on many digital platforms which provide users with the opportunity to set their own language preferences (triggering automatic translations).

Social Media Strategic Plan

Under development at the time of the preparation of this LAP, the Plan will address how SANDAG uses social media, including for communication with individuals with LEP. It is recommended that staff from appropriate departments (including OE, Office of Diversity and Equity, and Public Affairs) work together to ensure guidelines in the Social Media Strategic Plan align with the recommendations included in this LAP, and should include:

- Recommendations about when to translate content for social media
- Guidance about providing same information to speakers of different using culturally appropriate language
- A list of the top languages expected to be encountered in the social media realm, and recommendations for translating content, following requirements and recommendations in this LAP

Websites

Websites are an important method for communicating with the public, including persons with LEP. A redesign of the SANDAG.org website is in progress, including improvements for language access and ADA accessibility. SANDAG already provides much content in Spanish along with the Google Translate toolbar for other languages, and SANDAG will continue to create dedicated Spanish language websites for certain projects.

A new SANDAG webpage (sandag.org/LanguageAssistance) was recently created. It is envisioned to be a centralized source of translated materials, information about SANDAG's language assistance efforts, and guidance about using translation tools and/or requesting translation or interpretation assistance. Links to this site will be located on other webpages throughout the SANDAG website. In conjunction with the Free Language Assistance Notice (above), it can provide a streamlined way for persons with LEP to use the SANDAG website.

A review of several SANDAG webpages revealed some inconsistencies with the Google Translate toolbar (see screenshots in Figure 6-3). On three pages, the toolbar was located at the bottom of the page and only labeled in English without any icon or pictogram. On one, the bottom of the page was more than a full page beyond the initial splash screen, although a link for Spanish content was found near the top. A fourth site, for the South Bay Expressway, which serves the Mexican border and covers an area with many Spanish speakers, did not have the translation toolbar.
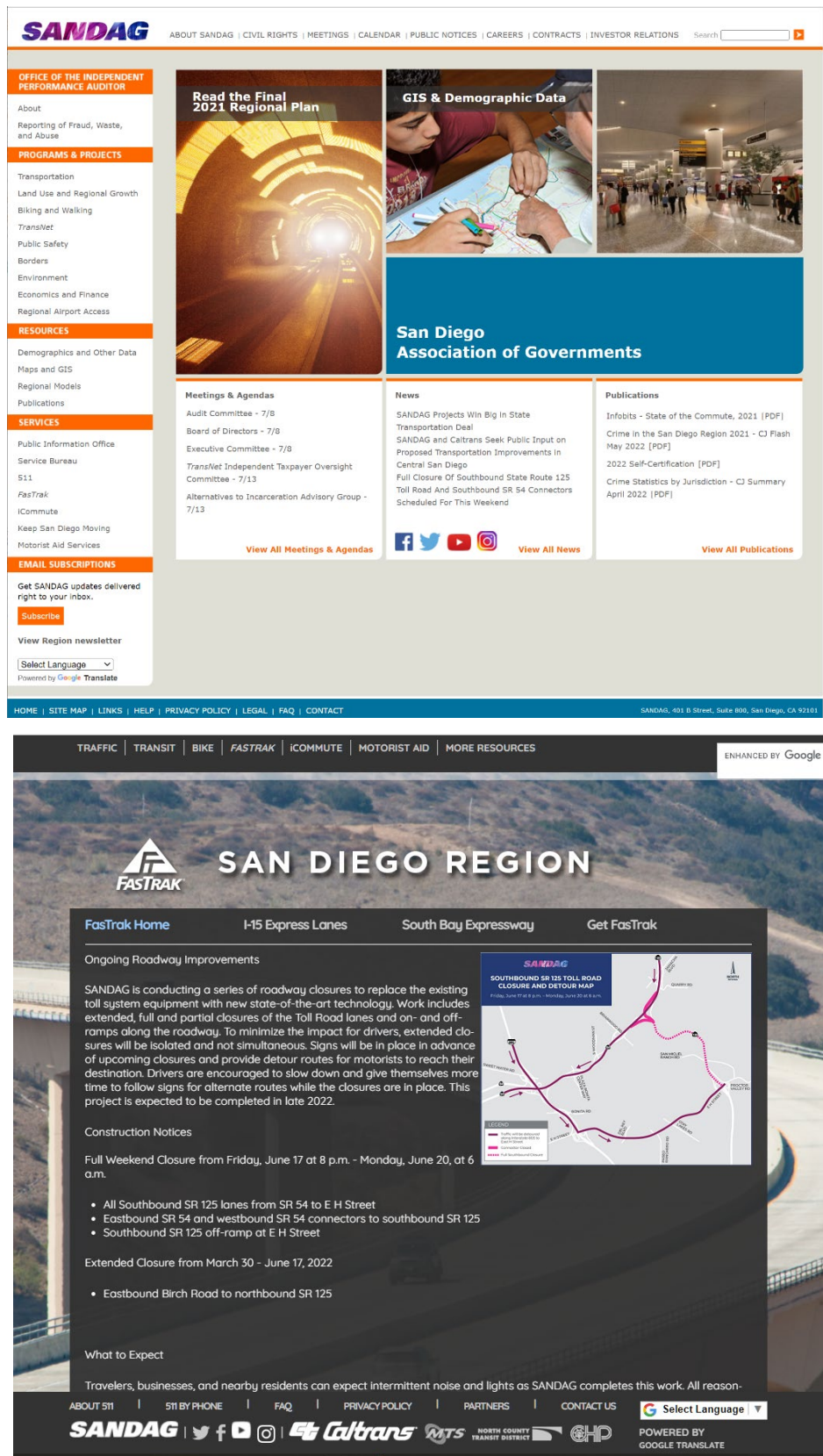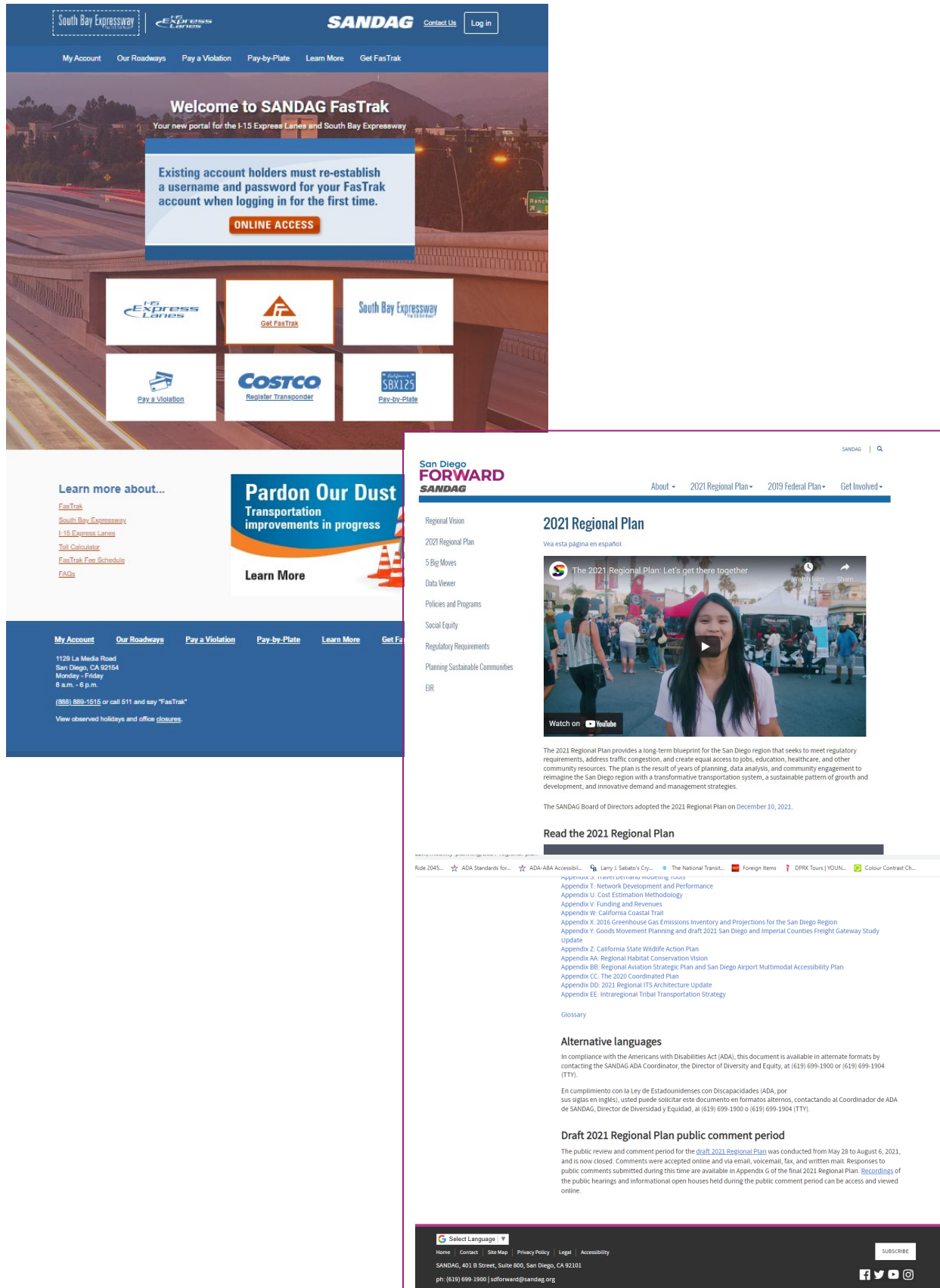
Figure 6-3: SANDAG Web Pages

Figure 6-3: SANDAG Web Pages (Continued)

On the SANDAG pages with Google Translate where the viewer clicks on a link to a PDF, the PDF usually comes up in its original English form; no tools or instructions are provided for obtaining the information in alternate languages.

To enhance the experience of individuals with LEP, improvements to SANDAG's web presence through the website redesign should include:

- Improving usability of the translation toolbar by locating it at the top of each page, in a contrasting color, and including a special icon, such as shown on the MTS website (Figure 6-4)

- Ensuring that documents available on the website are either able to be translated in the browser or downloaded and easily translated to the greatest extent possible

- Ensuring information about requesting translation of documents found on SANDAG sites is easy to find and easily understood

- Eliminating the use of images containing text (which cannot be translated)

- Translating the South Bay Expressway website into Spanish, similar to the San Diego Forward web content

Figure 6-4: Metropolitan Transit System Website Home Page
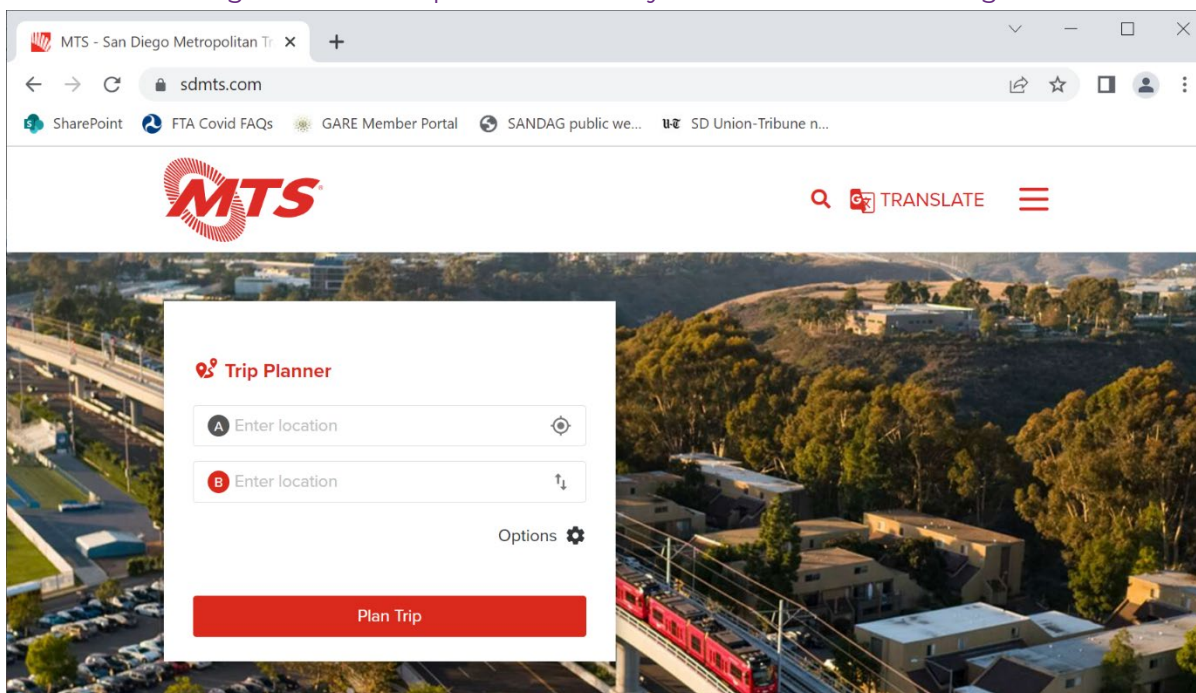
In addition to high-level language assistance measures, program-specific language assistance measures at SANDAG include the following:

SANDAG Board, Policy Advisory Committees, Social Services Advisory Committee

- Simultaneous interpretation available in English/Spanish at every meeting, including virtual/hybrid meetings

- Notification of non-discrimination, Title VI rights, and complaint procedures provided on agendas

- Agenda notice that materials can be made available in alternate languages

Regional Planning, Transportation Planning, Corridor Planning

- Interpretation provided at public meetings/workshops based on invited or expected LEP audience
- Bilingual English/Spanish staff attend public meetings and workshops in areas with high concentrations of Spanish-speaking LEP populations
- Bilingual English/Spanish court reporter present at meetings where public comment is requested
- Notifications for document review and comment periods and for planned environmental analysis provided in English/Spanish
- Fact sheets, fliers, brochures, and comment cards; surveys for workshop/community meetings; and some web content produced in English/Spanish; some content in other languages produced as appropriate
- Informational videos and webinars in English/Spanish (voiceover or subtitles)
- Partnerships with Social Equity Working Group and other CBOs to encourage participation from and ongoing engagement with underrepresented groups including those with concentrations of LEP populations
- Periodic, region-wide public opinion surveys in English/Spanish
- Surveys translated to other languages depending on LEP populations in project areas
- Use of CBO database to provide information to organizations that serve LEP communities

511 Website and Phone System

- Bilingual English/Spanish IVR phone system; work toward improving/streamlining Spanish voice recognition
- Bilingual English/Spanish operators at roadside assistance service centers

Transit Fare Changes

- Public comment information printed in English/Spanish in regional and local newspapers
- Bilingual English/Spanish staff attend public meetings and workshops in areas with high concentrations of LEP populations
- Public notices provided in English/Spanish when fare changes are being considered
- Community outreach materials provided in English/Spanish when fare changes take place
- Fact sheets and comment cards produced in English/Spanish in areas with high concentrations of LEP populations
- Onboard transit rider survey conducted in English/Spanish, and additional languages through digital format as needed

Motorist Aid

- Written and online customer survey produced in English/Spanish

- Web content provided in Spanish

- Bilingual English/Spanish Freeway Service Patrol drivers with one driver currently fluent in Chaldean (as available—bilingual skills not required by contract)

- Laminated information cards in Tier 1 and Tier 2 languages, with photo depictions of services offered; include notification of this feature on website

- Spanish language media purchased for marketing campaigns

- Informational rack card in English/Spanish

- English/Spanish informational insert in registration wallet that is handed to all motorists after receiving service

- English/Spanish card inviting motorists to share their experience by taking the survey or writing a review on Yelp

I-15 Express Lanes, South Bay Expressway, and FasTrak

- Bilingual English/Spanish IVR phone system; work toward improving/streamlining Spanish voice recognition

- 88% bilingual English/Spanish customer service representatives; additional representatives fluent in other safe harbor languages; Bilingual skills shown as preferred in job description

- Bilingual staff participate in outreach events in areas with high concentrations of LEP populations

- Printed and digital materials (brochures, application forms, marketing material) in English/Spanish

- English/Spanish automated cash machines at toll road on/off ramps

- FasTrak customer surveys translated into Spanish

- Spanish language media purchased for marketing campaigns

iCommute

- Bilingual English/Spanish operator

- Bilingual staff sent to employer and community meetings as needed

- Spanish language media purchased for marketing campaigns

- Program applications and rules/agreements, and Vanpool program webpage, provided in Spanish

- Collateral, including employee surveys, translated into Spanish and other languages as needed

Bilingual Employees and Pay Policy

Spanish is the only language in Language Priority Group 1. More than 240,000 Spanish-speaking residents in San Diego County do not speak English very well. As a border community, the region witnesses a large daily influx of Spanish-speaking individuals with LEP who may need to access services such as 511, Motorist Aid, or the South Bay Expressway. There is a demonstrable need for public offices in San Diego County to provide services to the Spanish-speaking population. Bilingual employees are the key to meeting that need. Currently, SANDAG has a number of bilingual employees in positions at the Toll Operations Center and other locations and on contracted service such as the Freeway Service Patrol. However, neither the positions not the contract are classified as requiring written or verbal communication skills in languages other than English.

Many California government departments and local governments across southern California have certain positions that require employees to be fluent in Spanish. In conjunction with this requirement, the agencies have implemented standards for demonstrating language abilities, and provide eligible employees a bilingual pay differential. Within San Diego County, the County and many cities (e.g., San Diego, Chula Vista, Carlsbad, Encinitas, Escondido, National City, Oceanside, etc.) have policies that provide bilingual pay, including processes for identifying and approving positions, testing procedures, and setting the additional amount of a pay an employee may receive. (It should be noted that State law provides that an employee in a position newly categorized as bilingual may not be terminated because of their inability to meet such a new requirement.)

This LAP proposes to increase the availability of bilingual employees at SANDAG though research and possible implementation of a new Bilingual Pay policy and related administrative procedures. Creation of a Bilingual Pay policy would provide an opportunity to test or certify employees to ensure those representing SANDAG have a sufficient grasp of the required language to represent the agency. The annual cost of providing a bilingual pay differential would be estimated as part of the initial research and development of the new policy; this estimate would include the identification of positions that might be designated as requiring bilingual staff and the costs for language testing to confirm the fluency of existing and potential new employees.

If a bilingual pay policy is implemented, it should include a procedure whereby Human Resources, program managers, and Directors would periodically evaluate job responsibilities to identify the employees who use bilingual (English/Spanish) skills on a regular basis. Further, as part of establishing eligibility for bilingual pay, the employee would be required to demonstrate proficiency through a standardized testing process offered by a third-party. Areas that may be reviewed in the development of the bilingual pay policy might include Toll Plaza attendants, Customer Service representatives, receptionists, those involved in Borders Programs, and Planners and Communications staff, to name a few examples.

Only 21 employees have currently agreed to be on the list of employees willing to use their second language abilities. In the survey conducted for this LAP update, 28 employees said they would be willing to use their second language skills. Putting extra attention and developing procedures for engaging employees' assistance, along with simply providing an opportunity for new employees to add their name to that list, could increase employee support for these efforts. A Bilingual Pay Policy may provide one additional incentive for bilingual employees to be recognized for using their language skills at work.

Training on Limited English Proficiency Requirements

The key to a successful LAP is having staff who understand the state and federal laws, regulations, and guidance for providing service to individuals with LEP and know what resources are available at SANDAG to meet the mandate.

As part of the orientation for new employees, a training session about civil rights and language assistance at SANDAG should be provided. The training should cover state and federal laws, regulations and guidance, and the resources available at SANDAG. Each new project manager should be provided with the Language Assistance Toolkit, and employees likely to receive phone calls from the public must be trained in the use of the over the phone interpretation service.

Language assistance training for continuing employees should be provided each time the LAP is updated; if convenient, the training can be combined with other civil rights training programs.

Advocate for Measures to Advance Access for Persons with Limited English Proficiency

Internal

In the past, one of the challenges for SANDAG to providing service to individuals with LEP was the absence of a dedicated resource committed to overseeing the implementation of previous LAPs. Prior to 2018 and the creation of the Department of Diversity and Equity there were limited staff dedicated to Title VI and language assistance. There was no one at SANDAG actively looking at the LAP to ensure that recommendations were being implemented or that translation and interpretation were being provided appropriately. Today, responsibility is more clearly defined and going forward implementation and compliance will be enforced.

External

One of the issues that was raised in the focus groups was the lack of multilingual signage for SANDAG-provided services along highways in San Diego County. Signs for Motorist Aid/511, call boxes, and warning and explanations for the I-15 Express Lanes and South Bay Expressway were specifically mentioned in several focus groups for this project.

The Federal Highway Administration has developed signage standards for highways in the United States. The standards are found in the Manual on Uniform Traffic Control Devices (MUTCD); in addition, individual states can add on to the standards for signs found only in their state. California has created a California MUTCD that supersedes the federal document and contains a number of signs and devices unique to California.

Other states near the Canadian border have signs with English and French in recognition that there are a significant number of French-speaking persons who drive across the border into the United States. Examples of the signs are shown in Figure 6-5 and provide a variety of information, from directions to regulations or just welcoming visitors. In some cases, the signs have French and English side by side so that people can become familiar with the meaning and still understand the English version of the sign when the French version is not present farther from the border.

Figure 6-5: Examples of Bilingual U.S. Highway Signs Near Canadian Border

Vermont

New York

New York

Massachusetts

New Hampshire

New York

Caltrans District 11 includes San Diego and Imperial Counties and is the only district along the Mexican border. SANDAG should join with Caltrans District 11 and request that the California MUTCD be updated to include signage for use within fifty miles of the border that incorporates pictograms, universal symbols, or Spanish. The signs would not replace the existing signage; they would provide additional information to enable persons with LEP to understand the basic function of the toll roads, express lanes, emergency call boxes, and 511 Motorist Aid.

This change would be beneficial to local LEP residents as well as border crossers from Mexico, who contribute significantly to the San Diego economy. Caltrans receives federal funding and is therefore also subject to Title VI of the Civil Rights Act and its LEP requirements, as well as State of California requirements, to serve LEP communities. Advocating for improved highway signage for LEP communities within San Diego County is consistent with the SANDAG Commitment to Equity.

7. Monitoring and Updating

Introduction

The LAP will be reviewed and updated, if necessary, every three to five years, to ensure alignment with the most recent Four Factor Analysis, the SANDAG Equity Action Plan, and any significant changes in the SANDAG Title VI Program. The Director of Diversity and Equity is responsible for the review and update of the documents and for monitoring the implementation of the plan, which falls under the Department of Organization Effectiveness.

The overall goal of the monitoring program is to measure the performance of SANDAG's language services and make adjustments and improvements as required. Both qualitative and quantitative data should be examined. The monitoring program will ensure SANDAG is compliant with federal regulations and that its efforts to communicate to persons with LEP are cost-effective and provide meaningful access for target populations. The monitoring program will reveal the strengths and weaknesses of the current program and point toward potential enhancements.

As part of the update of the LAP, a working group of SANDAG staff members was convened to review the work and provide input on the project. Creating a permanent working group of staff members to provide input on language assistance services would be beneficial. Linking the group to the staff panel on social equity issues would reaffirm the importance of language assistance at SANDAG.

Quantitative Data

Monitoring quantitative data would aid in preparing updates of Factors 1, 2, and 4 in the Triennial Four Factor Analysis. There are four elements to measuring language programs quantitatively:

- Documenting the number of resources committed to the program
- Identifying the number of contacts with individuals with LEP
- Tracking the number of products produced in alternative languages
- Identifying changes in the demographics of the county that could affect the safe harbor language list

Documenting the number of resources committed to meeting LEP requirements will require additional changes to the accounting practices at SANDAG. It will not be possible to track every penny, however major expenses include:

- Number and costs for translations
- Number and costs for interpretations
- Capital costs or leasing costs for hardware and software related to interpretation
- Bilingual pay differentials (if implemented)
- Printing/design costs for products in alternative languages
- Costs for advertising in alternative language media including newspapers, television, social media, and the internet

- Costs of language assistance training programs including staff time
- Cost of reviewing and updating Four Factor Analysis and LAP
- Cost associated with handling of complaints for language issues
- Staff time associated with creating tracking systems and compiling reports

Other non-cost-related quantitative data that need to be collected to monitor the program include:

- Number of requests received for translations and interpretation from public
- Number of contacts made in person, by phone, electronically or in writing with individuals with LEP for all SANDAG locations/services
- Number of products produced in alternative languages (documents, videos, tweets, etc.)
- Monitoring utilization rates of bilingual IVR systems and over the phone interpretation service
- Records of the number of staff who have received training on LAP measures at SANDAG
- County demographics for persons who do not speak English very well broken down by their native language

County demographics usually do not shift radically in a relatively short period such as three years. However, recent events such as have those that occurred in Afghanistan and Ukraine have shown that the impact can quickly be felt in San Diego. Those speaking a particular language can quickly reach the 1,000-person level requiring safe harbor protection.

Qualitative Data

The monitoring of qualitative data will assist in completing Factor 3 of the Four Factor Analysis Updates and provide a picture of the effectiveness of the programs identified in the LAP in providing meaningful access to SANDAG programs, facilities, and services.

Qualitative data can be more difficult to collect and requires greater effort. Examples of the types of data that should be included are as follows:

- Surveying staff members about their use of language assistance services including translation/interpretation requests and the over the phone interpretation service
- Soliciting suggestions for improvements to the language assistance program from staff and individuals who are LEP and contact SANDAG
- Conducting surveys or focus groups of SANDAG's consumers about their experiences using SANDAG language assistance services
- Conducting surveys of focus groups with CBOs that act as intermediaries with disadvantaged groups in San Diego County on behalf of SANDAG
- Assessing how well staff members understand LEP policies and procedures and how to access resources
- Reviewing the nature and importance of activities to persons with LEP and identifying any trends that might influence how resources should be adjusted

A major source of information about the effectiveness of the language assistance services can include focus groups. Focus groups were used in the preparation of this plan. However, as discussed in Section 4.1, because the persons recruited to participate may not actually have had prior contact with SANDAG, they were unable to provide comments about the quality of the language assistance available at the agency.

8. Summary of Conclusions and Recommendations

Factor 1: Identifying Individuals with Limited English Proficiency

The following safe harbor languages were identified:

Safe Harbor Languages	
1	Spanish
2	Tagalog (incl. Filipino)
3	Vietnamese
4	Chinese (Mandarin and Cantonese)
5	Arabic
6	Korean
7	Persian (incl. Farsi, Dari)
8	Japanese
9	Russian
10	Portuguese
11	Hindi
12	French (incl. Cajun)
13	Khmer
14	Telugu
15	Lao
16	Somali
17	Ukrainian

Factor 2: Frequency with Which Persons with LEP Come in Contact with SANDAG

The greatest number of contacts with individuals who have LEP are in Spanish, which is consistent with the findings of Factor 1 and reflective of SANDAG's cross-border planning relationship and San Diego County's geographic proximity to Mexico. The absence of data showing contact with other language groups appears largely to be due to people not being aware of SANDAG, its role, and the services it provides. Greater awareness of SANDAG's role and services in the LEP community will increase contacts.

Factor 3: Nature and Importance of Contact with SANDAG

The individuals who participated in the focus groups placed a high level of importance on being able to communicate with elected representatives though the board and policy committees. Transit riders also felt it was important to be able to comment on fare changes. Even though few had used the services, or even knew of their existence, the individuals participating in the focus groups found the Motorist Aid Services, including the Freeway Service Patrol and call boxes, to be particularly important. The 511 system, except for requesting Motorist Aid, was not seen as particularly important because more easily accessible traffic/transit information alternatives exist. iCommute was not viewed as important because none of the participants had a need for the services provided.

Factor 4: Resources Available to SANDAG and Estimated Costs

A full and accurate accounting of the cost of providing service in languages other than English is not possible because of previous limitations of the budgeting system used by SANDAG. Using a simple comparison between the percentage of the LEP population and an estimate of the percentage of budget committed to LEP communications, SANDAG is meeting the goal suggested in the U.S. DOT guidance for resourcing of LEP support.

A new cost code for translation and expenditures was created in the budget tracking system. It is hoped that the financial record-keeping system will more clearly capture costs associated with actual (and future) expenses.

Language Assistance Plan Recommendations

The 17 safe harbor languages have been divided into three priority groups, as shown below, based on LEP population and other factors such as geography and historical relationships:

Priority 1	Priority 2	Priority 3
Spanish	Tagalog/Filipino Vietnamese Chinese: Mandarin (oral); Simplified (written) Arabic	Chinese: Cantonese (oral); Traditional (written) Korean Persian Japanese Russian Portuguese Hindi French Khmer Telugu Lao Somali Ukrainian

A range of specific recommendations are included throughout the LAP, including:

- Follow Vital Documents and language group prioritization policies and procedures to guide translation efforts. Vital documents are organized into three tiers, with different translations requirements for each tier. Tier 1 documents—those with the highest priority—will be translated manually for all languages in Priority Groups 1 and 2, and made available in Priority Group 3 languages upon request or otherwise as deemed necessary to ensure meaningful access.

- Continue to manually translate documents and materials into languages other than those identified above if/when a project is located in a community with a large number of persons with LEP.

- Improve oral communications by ensuring front-line positions include bilingual employees, delays for interpretation are tracked, interpreters are provided at public outreach events, and all staff are trained on use of the over the phone interpretation service. Identify availability of interpretation and languages available at Board and Committee meetings in notice requirements.

- Improve written communications by ensuring vital documents are correctly translated according to priority groups. Implement a designated icon or pictogram, along with a Free Language Assistance notice, to identify any toolbars, QR codes, or links to translated documents. Support improvements to SANDAG webpages which will improve language access (expected to be rolled out during the website redesign).

- Develop and distribute an updated Language Assistance Toolkit, and improve and distribute various other tools to expand employees' ability to provide language assistance

- Consider implementation of a bilingual pay differential program for positions in which speaking a Priority 1 language is required or desirable. Annual costs of providing a bilingual pay differential, identification of positions that might be designated as requiring bilingual staff, and requirements to confirm the fluency of existing and potential new bilingual employees should be estimated during development of the new policy.

- Provide training on communicating with individuals with LEP and the resources available at SANDAG for all new SANDAG employees. Training for continuing employees should be provided when the LAP is updated

- It is recommended that staff advocate for LEP measures throughout the agency, and that SANDAG advocate to the state for allowing signage to be placed along state-controlled freeways and highways that provides multilingual explanations of SANDAG programs and services, such as tolls and express lanes, call boxes, 511, and Highway Service Patrol. (Note that such improvements can be made as signage is added, updated, or replaced.)

Monitoring and Updating

The plan contains recommendations for updating the LAP and for monitoring language assistance efforts to ensure language access services are being made available. In particular, it is recommended that SANDAG significantly increase the collection of quantitative and qualitative data on services for and contacts with persons with LEP.

9. Appendix 1: Employee Survey Form

SANDAG

* Required Information

SANDAG Employee Survey on Interaction with Persons with Limited English Proficiency

The following survey questions are intended to identify the frequency of contact and challenges employees face when dealing with people with limited English language skills. This survey will help update the Language Assistance Plan and provides you with an opportunity to suggest potential solutions for increasing effective communication. Your participation is important and should take approximately ten minutes to complete. **Please complete this survey by March 21.**

* 1. In which of the following areas/programs do you have contact with the public? (Check all that apply)

☐ SANDAG Board and policy committee meetings

☐ Regional planning efforts

☐ RTP Planning efforts

☐ Corridor planning/active transportation efforts

☐ I-15 Expressway

☐ South Bay Expressway

☐ 511, Motorist Aid Services

☐ General SANDAG information

☐ General SANDAG meetings/public outreach

☐ Human resources recruitment and selection

☐ Transit fare setting

☐ Transit planning

☐ Capital project Engineering, Design and Construction

☐ Purchasing and procurements

☐ None

☐ Other (Please explain) _____

* 2. How important is it for limited English speakers to have information regarding your area/program to access the programs, projects, and services funded by SANDAG?

☐ Extremely important

☐ Important

☐ Somewhat important

☐ Not at All important

SANDAG

* 3. How often do you interact with people who have limited English speaking skills?

☐ Daily

☐ Weekly

☐ Monthly

☐ A few times per year

☐ Rarely

☐ Never

NOTE : Branching Instructions
Follow the branching rules in the sequence given below. Jump to the page as specified in the branching rule if all the conditions specified in the rule are satisfied.
Rule 1
IF ANSWER TO (**Q3** is (**Never**)) THEN GO TO **Page 8**

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4. How often do you interact with limited English proficiency persons whose primary language is one of the following?
If you never interact with a specific language please do not check any boxes.

	Daily	Weekly	Monthly	A few times per year	Rarely
(a) Spanish	☐	☐	☐	☐	☐
(b) Tagalog (incl. Filipino)	☐	☐	☐	☐	☐
(c) Vietnamese	☐	☐	☐	☐	☐
(d) Chinese (all dialects)	☐	☐	☐	☐	☐
(e) Arabic	☐	☐	☐	☐	☐
(f) Korean	☐	☐	☐	☐	☐
(g) Persian (incl. Farsi, Dari)	☐	☐	☐	☐	☐
(h) Japanese	☐	☐	☐	☐	☐
(i) Russian	☐	☐	☐	☐	☐
(j) Portuguese	☐	☐	☐	☐	☐
(k) Hindi	☐	☐	☐	☐	☐
(l) French (incl. Cajun)	☐	☐	☐	☐	☐
(m) Khmer	☐	☐	☐	☐	☐
(n) Telugu	☐	☐	☐	☐	☐
(o) Lao	☐	☐	☐	☐	☐
(p) Chaldean	☐	☐	☐	☐	☐
(q) Somali	☐	☐	☐	☐	☐

＊ 5. How do you normally interact with limited English-speaking individuals?

- ☐ Via phone
- ☐ Using a virtual platform (Zoom, Teams, Facetime, etc.)
- ☐ Though social media (Facebook, Twitter, etc.)
- ☐ In person
- ☐ Email
- ☐ Text
- ☐ Written correspondence
- ☐ Other (Please specify) _____

＊ 6. What methods do you use to communicate with limited English-speaking individuals? (Check all that apply)

- ☐ Use "I Speak" cards to identify language first
- ☐ Use sign language, hand signals or body language
- ☐ Respond in their language
- ☐ Use online translation tools such as Google Translate
- ☐ Use an over-the-phone interpretation on a 3-way call
- ☐ Find a bilingual staff member to assist
- ☐ Provide written information in English
- ☐ Provide written information in their language
- ☐ Other (Please specify) _____

7. What are some of the challenges you face when communicating with individuals who do not speak English very well or not at all.
[Please consider providing a response. This information will be helpful for survey administrators.]

＊ 8. What tools do you have available to provide assistance to people with limited English language capabilities (Check all that apply)

- ☐ Brochure or instructions card in their language
- ☐ A dedicated phone number in that language
- ☐ Dedicated web content in that language
- ☐ Access to an over the phone interpretation service
- ☐ Google translate or other app on mobile phone or computer
- ☐ A list of bilingual employees to call for assistance
- ☐ None
- ☐ Other (Please specify) _____

∗ 9. What efforts have you or your department made to communicate more effectively with limited English-speaking individuals in the past three years (since 2019)?

☐ Translate new written materials

☐ Provided interpreters at public meetings and events

☐ Have bilingual staff attend events more frequently

☐ Conduct meetings in neighborhoods with high concentrations of limited English speakers

☐ Work with community based organizations to help distribute information in languages other than English

☐ Use ethnic media to provide information on SANDAG projects or programs

☐ Purchase advertising in ethnic or non-English media

☐ Sought out training or to have access to telephone translation service

☐ Requested or distributed "I Speak" cards in department

☐ No new initiatives since 2019

☐ Other (Please Explain) _____

∗ 10. Does your department budget have dedicated resources for providing assistance to persons with limited English proficiency? (check one only)

☐ I am not familiar with details of department budget

☐ No funds are not included budget for this purpose

☐ I do not know if funds are included in budget for this purpose

☐ Yes, Funds are available - Please enter annual amount below _____

11. **∗ What is your satisfaction level with your existing tools for providing assistance to individuals who speak limited English, on a scale of 1 to 5, with 5 being the highest level of satisfaction? (Select one option)**

1	2	3	4	5
○	○	○	○	○

12. What other tools would help you to assist customers who speak limited English?
[Please consider providing a response. This information will be helpful for survey administrators.]

13. Do you speak any of these languages fluently?
[Please consider providing a response. This information will be helpful for survey administrators.]

- [ ] None
- [ ] Spanish
- [ ] Tagalog or other Filipino dialects
- [ ] Mandarin
- [ ] Cantonese
- [ ] Arabic
- [ ] Korean
- [ ] Persian (including Dari and Farsi)
- [ ] Chaldean
- [ ] Japanese
- [ ] Russian
- [ ] Portugese
- [ ] Khmer
- [ ] Hindi
- [ ] Tegulu
- [ ] Somali
- [ ] Lao
- [ ] French (including Cajun)
- [ ] Other dialects or languages not listed above (including other Chinese dialects)? _____

NOTE : Branching Instructions
Follow the branching rules in the sequence given below. Jump to the page as specified in the branching rule if all the conditions specified in the rule are satisfied.
<u>Rule 1</u>
IF ANSWER TO (**Q13** is (**None**)) THEN GO TO **Page 15**

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14. Would you be willing to assist SANDAG to interact with individuals with limited English proficiency in the language(s) you can speak?

- [ ] No
- [ ] Yes, by speaking with members of the public in informal settings (not formal interpretation services such as at Board meetings)
- [ ] Yes, by internally reviewing translations of documents or other tasks that do not involve the public
- [ ] Yes, by participating in an advisory group to assist in improving language assistance measures at SANDAG
- [ ] If you answered Yes to any of the questions above please provide your name and email _____

＊ 15. How long have you worked for SANDAG?

- [ ] Less than 1 year
- [ ] 1 to 5 years
- [ ] 6 to 10 years
- [ ] More than 10 years

✳ 16. Does your department at SANDAG record statistics on the number of contacts with persons who have limited English proficiency?

☐ No

☐ Yes

☐ I don't know

☐ If yes, who may we contact to obtain this data? _____

✳ 17. Which SANDAG Department do you work for?

☐ Executive

☐ Office of General Counsel

☐ Business Information and Technology

☐ Organizational Effectiveness

☐ Data Science

☐ Regional Planning

☐ Region Transportation Services

☐ Government Relations and Communications

☐ Capital Projects and Programs

☐ Accounting and Finance

☐ Financial Programming, Budgets and Grants

☐ Office of Independent Auditor

18. Optionally please provide your name and contact info to allow our consultants to follow up if they have any questions for you.

10. Appendix 2: Community-Based Organization Focus Group Moderator Guide and Consent Form

SANDAG 2022 Language Assistance Plan Update Community-Based Organization Focus Group Moderator's Guide

INTRODUCTION: (5 minutes)

Thank you very much for joining us today to share your opinions about the San Diego Association of Governments, or SANDAG, as it's commonly known and some of the programs and services the organization offers.

My name is _____ and my role at _____ is _____. I will be moderating today's discussion. I am not a SANDAG expert, so you can ask questions, but please know that I may not have the answer and would have to get it for you later.

I am joined today by _____. (Introduce the Notetaker)

NOTE-TAKER: I am _____ and my role at _____ is _____. I will be taking detailed notes of our conversation today. *[Mention use of recorder if included.]*

You are here because you may have used some of SANDAG's programs or services and you have indicated that you are most comfortable speaking in a language other than English. SANDAG wants to hear about your opinions and your experiences using its programs services so that its staff can better assist customers who don't speak English very well.

The information you provide will help SANDAG update the Language Assistance Plan, a document that outlines how SANDAG helps people with limited English skills access SANDAG's program and services.

This session will last about two hours. If you need to visit the restroom during this session, *[insert location of restroom]*.

GROUND RULES: (10 minutes)

As your moderator, my role is to create a space where everyone feels comfortable to participate or ask questions, facilitate a discussion, and make sure that everyone has an opportunity to share, listen, and be heard. To that end, I would like to go over some guidelines to help the discussion go smoothly.

- We want to hear from each one of you, and I know some of you may be more comfortable speaking in groups than others. One of my roles is to make sure all of you have a chance to share, so if you are sharing a lot, I will probably ask you to give others time to speak, and if you aren't sharing much, I may call on you to share your opinion.

- We have a very full agenda. In addition to using a timer *[only if a timer is being used]*, I may interrupt if the conversation seems to be going off topic or if there are many people that want to speak at the same time.

- Also, we expect there to be different perspectives; you may not agree with each other, but please listen respectfully as others share their views, and please do not counter or debate them.

- This is an information gathering session, so all perspectives are welcomed and encouraged.

- Please speak one at a time and do not interrupt. I will make sure you all have an opportunity to share and be heard.

- Idea sharing is the focus, and the views shared are confidential and will be summarized as a whole.

Does anyone have any questions about these ground rules? Does everyone agree to abide by these basic ground rules?

We will start with a brief introduction of SANDAG and what programs and services it provides and then we will narrow our discussion to cover a few of these items. Toward the end of this session, we will open it up to discuss anything we haven't covered yet.

But, before we continue, I would like everyone to have the opportunity to introduce themselves.

Please introduce yourself by letting us know your name (first name is okay) and if you are familiar with SANDAG.

SANDAG INTRODUCTION: (10 Minutes)

San Diego is a big place and people get around in different ways. How do you get around?

Some of you are familiar with SANDAG. You may not be aware of all the programs and services it offers residents in San Diego County. I'm going to name off a few of SANDAG's responsibilities. Please raise your hand for each one if you knew this before you were recruited for this group.

- SANDAG is the regional planning agency for San Diego and develops the long-range transportation plan that guides the development of roads, freeway, transit, and active transportation projects in the County as well as dealing with regional issues such as housing, social equity, transborder issues, energy, public safety, and shoreline preservation *[Show photo/logo]*

- SANDAG plans, designs and builds bus, Trolley, and train projects on behalf of MTS and NCTD and sets the fares that these agencies collect for their services *[Show photo/logo]*

- SANDAG manages the 511 phone system and website, a free service that consolidates the region's transportation information into a central resource for the public *[Show photo/logo]*

- SANDAG manages Motorist Aid Services, including the Freeway Service Patrol and Call Box Program *[Show photo/logo]*

- SANDAG manages the iCommute program, that includes Commuter Assistance, such as Guaranteed Ride Home and Vanpool Program, and Employer Services, such as the Commuter Benefits Program *[Show photo/logo]*

- SANDAG manages the FasTrak Program on the I-15 Express Lanes and operates the South Bay Expressway/SR 125 Toll Road *[Show photo/logo]*

As you can see, SANDAG is an organization with many programs and areas of service. For our purposes today, we are going to focus on a few specific topics.

We will spend approximately 10-15 minutes on each of these topics. As we mentioned earlier, we will leave time toward the end of the session to cover other topics that you are interested in.

QUESTIONS:

SANDAG Meetings, Transportation Planning and Regional Planning (15 minutes)

The first set of questions will focus on Transportation Planning and Regional Planning. Federal law requires SANDAG to prepare a Regional Transportation Plan every 3 years, and during that process the public is invited to participate in its development. SANDAG also deals with other regional issues such as housing, energy, shoreline preservation, public safety and cross border coordination.

1. Have you attended SANDAG board or committee meeting or public participation event?
   - Did you understand conversations in English? Did friends or family translate for you? Were SANDAG interpreters available?
   - Were you able to participate in the event?
   - If not was it due to language?

2. Have you tried to read or browse a SANDAG Planning report?
   - Was the report available in your language?
   - What was the subject?
   - If not available in your language, did you ask SANDAG or someone to translate the report for you?
   - Was the lack of a translated document a barrier for you?

3. What could be done to improve language access?

Public Transportation (15 minutes)

The next questions will focus on fare setting for public transportation including Trolley, Coaster, and the Sprinter in San Diego County.

1. Were you aware that fares on MTS and NCTD are set by SANDAG?

2. Are you aware that that the public is invited to comment on proposed fare changes?
   - If you did not know do you think it was due to a language barrier?
   - If you were aware of the opportunity, did you participate?
   - Were you able to participate in the language of your choice?
   - If language were less of a barrier, would you participate in the future?

3. Have you seen notices for public hearings about transit fares changes or increases?
   - Was language a barrier to understanding how fares might change?

4. What is the best means of reaching you in your language to discuss possible fare changes?

511 Website and Phone System (15 minutes)

The next set of questions will cover the 511 system. As some of you may know, 511 is available through an automated phone line and online. 511 provides traffic information, transit schedules, traffic maps, and more. *[NOTE FOR MODERATOR: The 511 automated phone system is available in Spanish. All SANDAG websites, including 511sd.com, have the Google Translate toolbar.]*

1. Have you accessed the 511 system by phone or web?

    - If by phone did you speak English, have someone else speak in English for you or request an interpreter be brought onto the call?

    - Did you know that interpreters are available on 511 calls for your language?

    - If by web, did you, do it English? Have someone do it for you in English? Or did you use Google Translation online? Was Google Translate acceptable translation

2. How could it be made easier for you to use 511 in your language?

Motorist Aid Services Program (15 minutes)

Now we will move on to discuss the Motorist Aid Services Program. SANDAG administers services to aid distressed motorists and help remove stranded vehicles on the region's most congested freeways. Some of you may have recognized the Freeway Service Patrol trucks that patrol the highways to provide free roadside assistance. Motorists can call 511 from a cell phone for free roadside assistance, available on most urban freeways during peak commute periods. You also may have seen yellow call boxes on rural highways. These are free phones that connect stranded drivers in locations with poor cellular signal to an operator who can dispatch help, 24 hours a day.

1. Did you know about these services before today?

    - Have you used a highway call box?

    - What language did you use to speak with the operator?

    - Was the operator able to speak your language? Did someone with you interpret for you? Did SANDAG provide an interpreter?

    - Did you know you can request an interpreter?

2. Did you receive assistance from Freeway Service Patrol?

    - Did patrol driver speak your language? Did someone with you provide interpretation? Did the patrol driver get an interpreter on the phone?

3. What can be done to make these services more accessible for LEP persons?

iCommute (15 minutes)

Now let's talk about iCommute. iCommute provides information on transportation choices for commuters in the San Diego region including carpool services, a subsidized vanpool program, transit solutions, regional support for biking, the Guaranteed Ride Home program, information about teleworking, and bike and pedestrian safety program support for schools. iCommute has a commute cost calculator tool that allows you to see how much an alternative commute could save you, among other resources. iCommute also provides assistance to local businesses, helping them develop and implement customized employee commuter benefit programs.

SANDAG

1. Have you ever contacted iCommute? (Online, phone, or in person with an account executive)

2. If contact was in person or by phone, was it in English or was someone at iCommute able to help you in your language? Did someone at your end help you communicate with iCommute?

    • Did you know that you could request a translator on your call?

    • If contact was on the web was Google Translate used? And was it effective for you?

3. What ideas do you have for making this information easier to access and use for people who do not speak English very well?

FasTrak (15 minutes)

Our next section will cover the two toll roads in San Diego, the I-15 Express Lanes and the South Bay Expressway on SR 125, and FasTrak transponders.

1. Do you own and drive a car or truck?

2. Do you ever drive on I-15 or SR 125?

3. Do you have a FasTrak transponder? Are you familiar with FasTrak?

    • How did you learn about FasTrak? Was the information in your language? Did you use family or friends to translate? Did you get information from SANDAG in your language?

4. If you don't have FasTrak would you get a transponder if information was available in your language?

Concluding Questions (15 minutes)

Our final section will cover some general questions about SANDAG assistance to the public.

1. Have you ever tried to call SANDAG or visited SANDAG offices?

    • Were you able to communicate with SANDAG in your language?

2. Have you ever used the SANDAG or Regional Plan website?

    • Did you use in English or use Google Translate?

    • If you used Google Translate, was it effective?

3. What are some of the ways that SANDAG could do better in informing people who speak limited English?

SANDAG 2022 Language Assistance Plan Update
Focus Group Consent Form

<INSERT ORGANIZATION NAME> is helping the San Diego Association of Governments (SANDAG) assess ways to improve its programs and services. You have been invited to participate in a focus group as part of this effort. The purpose is to examine how people who do not speak English well use SANDAG programs and how to improve services for this group.

Your participation is completely voluntary, and you may withdraw at any time without penalty.

Your participation may benefit you and others by helping to improve SANDAG programs and services. No risk greater than ordinary conversation is anticipated.

Everyone will be asked to respect the privacy of the other group members. All participants will be asked not to disclose anything said within the context of the discussion, but it is important to understand that other people in the group with you may not keep all information private and confidential.

Anonymous data from the focus group will be analyzed and reported to SANDAG. No individual participant will be identified or linked to the results. All information will be kept strictly **confidential**.

By signing this consent form, you are indicating that you fully understand the above information and agree to participate in this focus group.

_____   _____
Participant's signature   Date

_____
Printed name