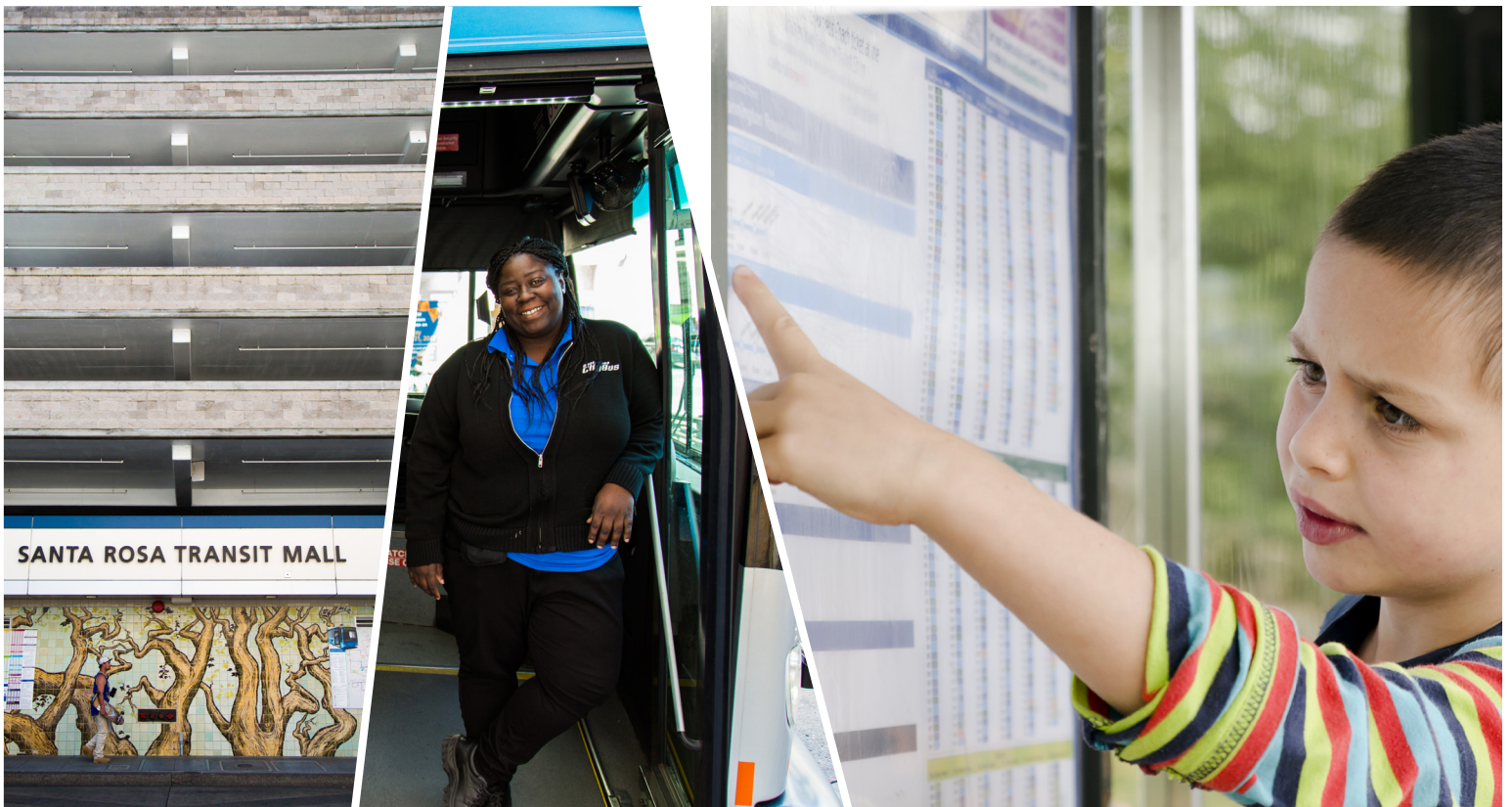


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I. Introduction

This Language Assistance Plan facilitates the City of Santa Rosa Transit Division’s efforts to provide an appropriate mix of language assistance measures. These measures help meet the needs of individuals within the Santa Rosa CityBus service area who are “limited English proficient”. Limited English proficient (LEP) individuals are those who have a limited ability to read, write, speak, or understand English. The plan includes demographic analyses, surveys of Santa Rosa CityBus and Santa Rosa Paratransit staff, input from community organizations serving LEP individuals, and feedback from LEP individuals themselves. This plan also summarizes language assistance measures Santa Rosa Transit Division is using and measures it is planning for future use.

II. Background

Title VI of the Civil Rights Act of 1964 provides that 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. Title VI regulations have been interpreted to hold that Title VI prohibits conduct that has a disproportionate effect on LEP persons because such conduct constitutes a form of national origin discrimination. Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency,” directs each federal agency to examine the services it provides and implement a system by which LEP persons can meaningfully access those services, and to publish guidance for their respective funding recipients to assist them in meeting their obligations to LEP persons under Title VI.

This plan uses the “Four-Factor Framework” outlined in the U.S. Department of Transportation’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons (DOT LEP Guidance, Federal Register, vol. 70, no. 239, pp. 74087-74100, December 14, 2005). The Transit Division has applied the Four-Factor Framework according to guidance provided in the Federal Transit Administration Office of Civil Rights’ Implementing the Department of Transportation’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers (April 2007).

III. Analysis Using the Four Factor Framework

Factor 1: The number and proportion of LEP persons served or encountered in the eligible service population.

Task 1 - Step 1: Examine prior experiences with LEP individuals

A survey of Santa Rosa CityBus and Santa Rosa Paratransit staff who interact with the public was administered in January and February 2022 to gauge prior experience with LEP individuals. The number of responses received for each operational section is displayed in Table 1.

Table 1: Break Out of Staff Response from each Operational Section

Operational Section	# of Employee Responses
Fixed Route Operations	44
Paratransit Operation	9
Administrative	7
Total	60

Staff were also surveyed about the frequency of their interactions with LEP individuals. Table 2 breaks out this frequency.

Most Common Questions from LEP Individuals to Staff




 What time does my bus arrive?
  How do I get to my destination?
  How much do I pay to ride the bus?

Table 2: Number of staff interactions with LEP individuals each week

Operational Section	0 - 5	6 - 20	21 - 39	40+
Fixed Route Operations	18	7	12	6
Paratransit Operations	6	3	0	0
Administrative	5	1	1	0
Total	29	11	13	6

Fixed route operations staff proportionally have the most interactions with LEP individuals. Fourteen percent of fixed route operations staff stated having 40 or more interactions with LEP individuals while the other two operational categories were 20 interactions or less.

Most common language encountered by all staff

Spanish



Most importantly staff rated themselves on their ability to effectively communicate with LEP individuals. The self ratings in Table 3 show close to half of staff across all operational sections feel they can communicate effectively “most of the time”.

Table 3: Staff’s Ability to Effectively Communicate with LEP Individuals

Operational Section	Most of the Time	Some of the Time	Not Very Often
Fixed Route Operations	25	18	1
Paratransit Operations	5	4	0
Administrative	3	2	2
Total	33	24	3

24% of staff report being able to speak a language other than English “very well”.

Task 1 - Step 2: Become Familiar with data from the U.S. Census

Task 1 - Step 2A: Identify the geographic boundaries of the area your agency serves

Santa Rosa CityBus defines its service area as the city limits of Santa Rosa, including the Oakmont senior community in southeastern Santa Rosa. The Santa Rosa Paratransit service area extends ¾ mile beyond the CityBus fixed route service. For this analysis, data have been collected for the City of Santa Rosa area.

Task 1 - Step 2B: Obtain Census data on LEP population in your service area

CityBus staff obtained data from the American Community Survey – U.S. Census Bureau Releases 2020 ACS 5-Year Estimates.

Task 1 - Step 2C: Analyze the data you have collected

Table 4 provides the breakdown of the top fifteen languages spoken in the CityBus service area. The most significant non-English language populations speak Spanish, Other Asian and Pacific Island languages, and Other Indo-European Languages.

Table 4: Top Fifteen Languages Spoken in Santa Rosa

Language Spoken at Home	Estimate
Speak only English	112,516
Spanish	42,043
Other Asian & Pacific Island Language	2,693
Other Indo-European Language	2,644
Tagalog (incl. Filipino)	1,602
Chinese (incl. Mandarin, Cantonese)	1,335
Other & Unspecified Languages	1,321
Vietnamese	1,127
Korean	817
French, Haitian, or Cajun	760
German or other Western Germanic	748
Russian, Polish, or other Slavic Language	606
Arabic	378

U.S. Census Bureau, 2020 American Community Survey 5-year Estimates (Table C16001 Language Spoken at Home for Population 5 Years and Older)

Spanish speakers are the largest population within the top 15 languages spoken in Santa Rosa. This is unsurprising as staff indicated Spanish as the predominant language they encounter on a day-to-day basis. Staff also encountered languages from the next two largest groups. Staff interact with individuals speaking of the twenty individual languages that fall under the “Indo-European” language group. Specific languages encountered that fall into this broad category are: Armenian, Hindi, Persian, and Urdu.

Asian languages were also encountered by staff, predominantly Mandarin Chinese and Tagalog.

Almost half (47%) of Spanish speakers speak English less than “very well” as seen in Table 5. Other Indo-European Languages is the only other language group that nears 1,000 individuals speaking English less than “very well”.

Table 5: Residents Five Years and Older Speaking English “less than Very Well”

Language Spoken at Home	Estimate
Total:	168,590
Speak only English	112,516
Spanish:	42,043
Speak English less than “very well”	19,719
French, Haitian, or Cajun:	760
Speak English less than “very well”	173
German or other West Germanic languages:	748
Speak English less than “very well”	23
Russian, Polish, or other Slavic languages:	606
Speak English less than “very well”	169
Other Indo-European languages:	2,644
Speak English less than “very well”	994
Korean:	817
Speak English less than “very well”	487
Chinese (incl. Mandarin, Cantonese):	1,335
Speak English less than “very well”	611
Vietnamese:	1,127
Speak English less than “very well”	691
Tagalog (incl. Filipino):	1,602
Speak English less than “very well”	408
Other Asian and Pacific Island languages:	2,693
Speak English less than “very well”	860
Arabic:	378
Speak English less than “very well”	93
Other and unspecified languages:	1,321
Speak English less than “very well”	331

U.S. Census Bureau, 2020 American Community Survey 5-Year Estimates (Table C16001 Language Spoken at Home for Population 5 Years and Older)

Task 1 - Step 2D: Identify any concentrations of LEP persons within your service area

Figure 1 identifies the number of households with limited English-speaking status per square mile, by Census tract. The areas with the highest concentrations of household with limited English-speaking status are found west of Highway 101, particularly in the Roseland neighborhood of southwestern Santa Rosa. This large concentration also extends northward along Highway 101 almost

reaching the tip of CityBus’s service area. One can also see a dense cluster just south of the downtown area.

Routes serving these concentrations have some of the highest frequency in the CityBus system with further increases planned for the future.

Figure 2 takes a more granular look at LEP concentrations within CityBus’s service area. The map shows concentrations of households who speak Spanish and speak English less than “very well”. Figure 1 and Figure 2 are identical in their concentrations further emphasis the fact that the majority of LEP individuals in the service area are Spanish speakers.



Figure 1: People Speaking English Less Than “very well” per Square Mile by Census Tract

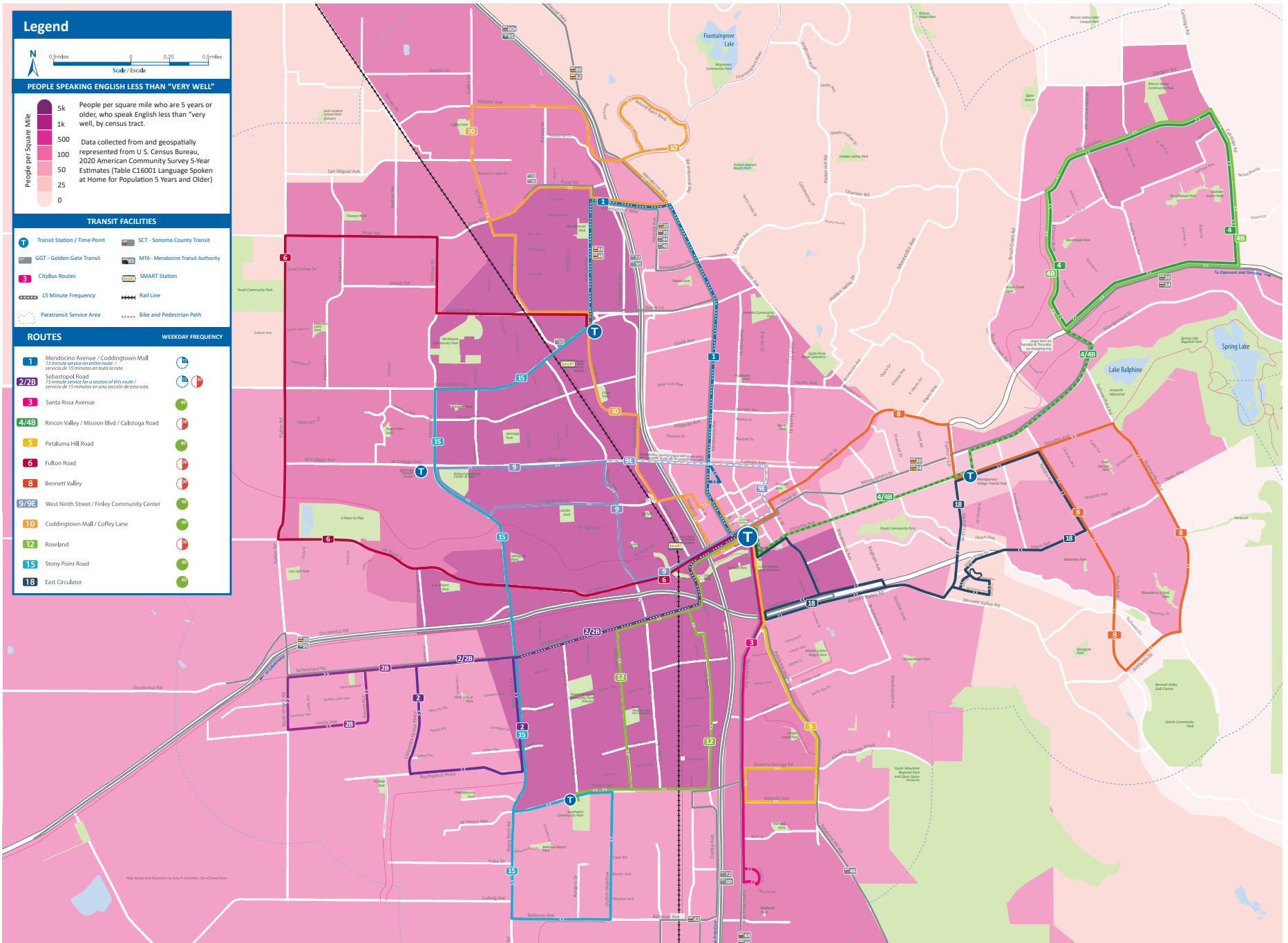
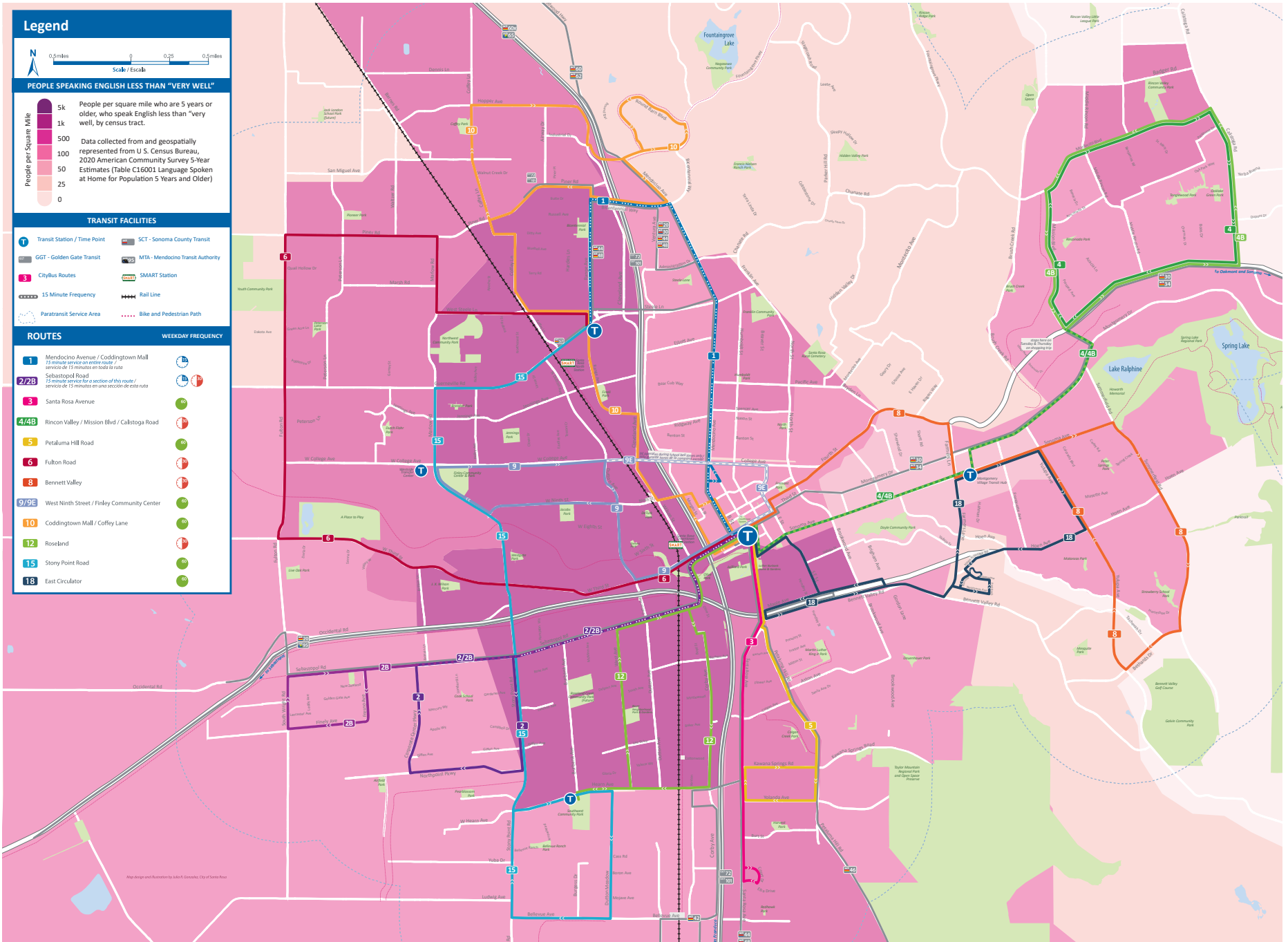


Figure 2: Spanish Speakers Speaking English Less Than “very well” per Square Mile by Census Tract



Task 1 - Step 3: Consult state and local sources of data

Data from the California Department of Education was analyzed to identify the languages spoken by English Language learners in Santa Rosa schools. Being able to engage effectively with this population is specifically important due to the fact that 24 percent of CityBus ridership is of school age. Table 6 lists the languages spoken by English Language Learners at Santa Rosa schools. In line with previous data the largest population of English Language Learners is Spanish speakers at 6,093 students.

Table 6: English Language Learners at Santa Rosa Schools By Language Spoken, 2021

Language Spoken	Population
Spanish	6,093
Other non-English languages	74
Vietnamese	72
Khmer (Cambodian)	46
Mandarin (Putonghua)	30
Filipino (Pilipino or Tagalog)	27
Punjabi	23
Tigrinya	23
French	19
Arabic	17
Lao	14
Japanese	12
Hindi	12
Korean	11
Cantonese	10
Russian	9
Urdu	6
Portuguese	5
Pashto	5
Thai	4
Hebrew	3
Taiwanese	3
Farsi (Persian)	3
Haitian Creole)	2
Tongan	2
Italian	2

Language Spoken	Population
Bengali	2
Marathi	1
German	1
Tamil	1
Romanian	1
Hungarian	1
Serbo-Croatian (Bosnian, Croatian, Serbian)	1
Kikuyu (Gikuyu)	1
Cebuano (Visayan)	1
Swahili	1
Mixteco	1

California Department of Education, Educational Demographics office

Task 1 - Step 4: Community organizations that serve LEP persons

Task 1 - Step 4A: Identify community organizations

Community organizations and social service agencies serving large numbers of LEP individuals were identified using the Santa Rosa Transit Division’s database of community organizations and by consulting with the City’s Community Engagement Department.

Task 1 - Step 4B: Contact relevant community organizations

CityBus staff used an internal community organization contact list as well as a list of contacts from the City of Santa Rosa’s Community Engagement Department. Overall 150+ contacts were sent a survey asking about population served, the transportation needs of the client population, demographic trends among the population, and effective ways to obtain input from the population.

Unfortunately, despite the robust contact list and follow up staff were only able to collect eight responses during the two week period the survey was active.

Staff do work with many of these organizations on a regular basis and have received excellent feedback from them regarding service planning and fares, in addition to having an open channel to communicate about language assistance needs.

Task 1 - Step 4C: Obtain information

As stated in the previous task, staff issued a survey to better understand how their LEP clients interact with the public transit system. Seven of the eight respondents serve clients across Sonoma County. The same number indicated the population their agency serves is growing.

Spanish was the predominate language spoken by their LEP populations which is unsurprising given that the Census data indicated Spanish Speakers as the largest population in Santa Rosa that speaks English "less than very well". Furthermore, 88% of agencies stated their LEP population has increase over the last five years with the other 12% stating it has stayed the same.

Factor 2: The frequency with which LEP individuals come into contact with your programs, activities, and services

Task 2 - Step 1: Review the relevant programs, activities, and services you provide

Fixed route transit and ADA paratransit are the two services provided by Santa Rosa CityBus. LEP individuals interact with the service on a daily basis by either using the services directly or seeking out information about the services. The means by which LEP individuals seek out information about the two services vary from person to person but include talking to bus operators, customer service staff, supervisors, referring to printed informational material, and using online information sources like the CityBus website and social media outlets.

Task 2 - Step 2: Review Information Obtained from Community Organizations

Despite the low volume of responses staff found that there are areas to improve communication to LEP individuals. When asked whether clients were able to easily find and understand information on transit services there was a 50/50 split in the responses. Staffed also asked the organizations the best way to provide information to their clients. Physical written material and electronic forms were cited as the best ways. Using this information staff will need to review its written and web material to see if improvements are needed for the quality of translation or the prominence of translated information. In addition, new types of information recommended in Task 4 will need to be scrutinized for their clarity.

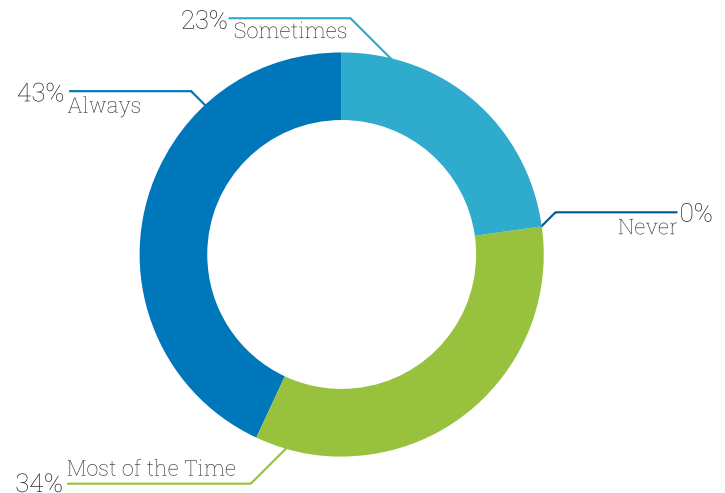
Task 2 - Step 3: Consult Directly with LEP Persons

CityBus staff conducted an online survey targeted to Spanish speaking transit riders in the Santa Rosa CityBus service area. The survey was entirely in Spanish and all free form responses were entirely in Spanish.

During the survey period staff was able to collect 35 unique responses. Of those 35 responses, 65% stated they spoke English less than very well. Fewer respondents indicated they read English less than very well (49%).

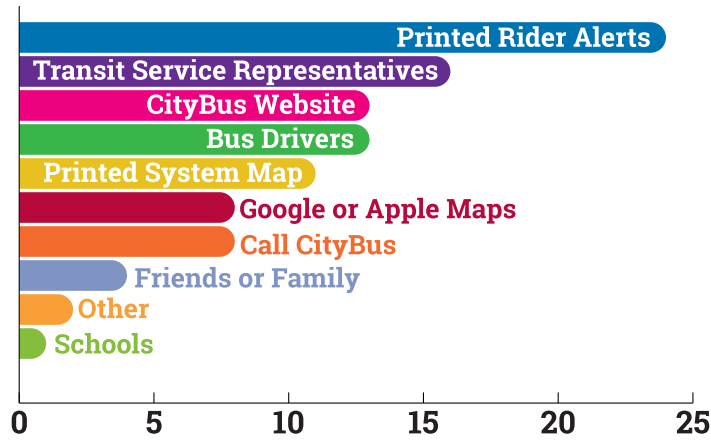
Respondents were asked how well they were able to understand information that CityBus provides. Figure 2 below shows a breakout of responses.

Figure 3: Percentage of Survey Respondents Indicating How Well They Understand CityBus Informational Material



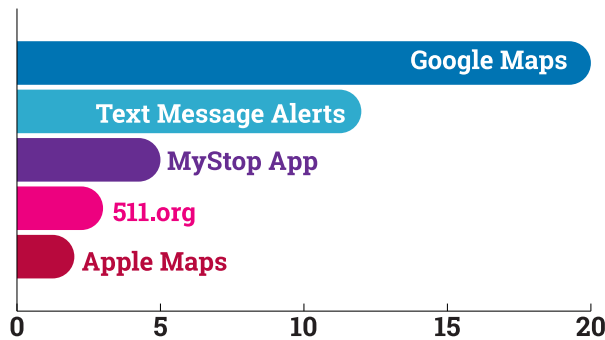
Riders also indicated their preferred information source for service changes and how they plan their trip. Respondents were able to select multiple sources for each question. Figure 4 shows how riders speaking English less than "very well" find out about changes to the service.

Figure 4: Preferred Method for Obtaining Information about Service Changes



Between service alerts and trip planning there were common sources of information. Google Maps had the most overlap and is the predominant source of trip planning information as seen in Figure 5.

Figure 5: Preferred Method of Trip Planning



Respondents were asked to provide free form feedback on what CityBus can do to better provide information. Many of the comments were positive and stated that material was easily accessible and properly translated. However, the feedback CityBus did receive was in favor of having more printed material on the buses and at stops.

Factor 3: The Importance of your programs, activities, and services to LEP persons

Task 3 - Step 1: Identify your agency's most critical services

Critical services are defined by the DOT guidance as programs or activities that would have serious consequences for individuals if language barriers prevent a person from benefiting from the activity. Serious consequences could include the inability of an LEP individual to effectively utilize public transportation to obtain health care, education, or access employment. Critical services provided by the

Transit Division include:

- CityBus route and schedule information
- Fare media information
- System rules
- Information on how to ride the system
- Rider Alerts regarding detours and bus delays
- Safety and security announcements
- Communication related to transit planning and service changes
- Information on ADA Paratransit services
- Non-discrimination (Title VI) policy

Task 3 - Step 2: Review input from community organizations and LEP persons

The Transit Division's communication with community organizations and LEP persons clearly identifies the importance of fixed-route transit services to LEP individuals, as well as the importance of the range of language assistance in Spanish already provided by the Transit Division.

Factor 4: The resources available to the recipient and costs

Task 4 - Step 1: Inventory language assistance measures currently being provided, along with associated costs

Santa Rosa CityBus provides the following language assistance measures to date:

- The City of Santa Rosa contracts with Language Solutions Incorporated, which is a translation service that allows staff and customers to speak with a live translator over the telephone. The service offers translation in over 150 languages.
- Use of pictograms or additional translation related to required actions/behavior onboard vehicles.
- A list of popular destinations and bus routes that serve those destinations to aid with trip planning is available in both English and Spanish.

- A list of all middle and high school campus and bus routes that serve these school to aid with trip planning is available in both English and Spanish.
- A number of CityBus and Santa Rosa Paratransit staff, are proficient in Spanish. They include eleven bus operators, two field supervisors, one customer service representative, one Transit Service Representatives (TSR), two paratransit operators, and two paratransit customer service representatives.
- All bus stop signs were redesigned in 2017 and display information in both English and Spanish.
- On board pre-recorded messages announcing stops are in both English and Spanish.
- Route information that can be accessed through the automated phone system is recorded in both English and Spanish.
- All information on system maps and schedules is both English and Spanish. This includes information about fares, holidays, how to contact staff, and trip planning information.
- All customer information brochures (e.g., Learn to Ride CityBus, Fare Policy) and Rider Alerts are printed in both English and Spanish.
- All social media posts and email news blasts communications and issued in both English and Spanish
- The Paratransit Users Guide is available in both English and Spanish.
- Information on promotional events is printed in English and Spanish.
- Car cards that include fare information and the Title VI non-discrimination policy are printed in English and Spanish and displayed continuously inside buses
- Stickers displaying fare information on buses are provided in both English and Spanish
- Information about filing a Title VI complaint is provided in both English and Spanish.
- Public notices of meetings and service changes are printed in both English and

Spanish.

- Important, time-sensitive information, including Public Service Announcements, are issued in both English and Spanish
- Interpretation is provided for Spanish-speakers at public meetings and workshops.
- All information on the City's website (www.srcity.org), including transit and paratransit information, can be translated into numerous languages by clicking a prominently displayed button found at the top of the webpage.

Task 4 - Step 2: Determine what, if any, additional services are need

According to the most recent Census data, the largest LEP population in the Santa Rosa CityBus service area is Spanish-speaking. The next largest group (994) is Indo-European language speakers. This population is near the "Safe Harbor" threshold (5% of the service area population or 1,000 individuals, whichever is less) but as this is a broad grouping it is unlikely those 994 individuals all speak the same language as the Census places over 20 individual languages under this category. From surveys of staff some languages encountered that fall into this broad category are: Armenian, Hindi, Persian, and Urdu.

Asian and Pacific Island languages also are of the larger LEP populations in the service area but also do not meet the threshold individually or as a broad category of languages.

Given the findings of this analysis, the translation of printed information into language groups other than Spanish is not warranted by the Safe Harbor provisions at this time. However, staff will continue to evaluate the need to translate additional printed materials into languages other than Spanish in coordination with community partners and City Community Engagement staff.

The following is a list of language assistance measures staff plans to investigate or implement based on this outreach and analysis:

- Develop material to better understand and use technology to plan trips and receive service information
- Review all translated materials to ensure the information is presented in language that is simplified and accessible to reader of various

levels of formal education

- Training for staff in the basics of communicating with Spanish-speakers
- Additional “guide-a-ride” style bus schedule information at key bus stops
- Posting or distribution of targeted transit information at stores that are popular with Spanish speakers
- Further education of the public as well as staff of community organizations and social services agencies about availability of language assistance
- Provide more printed material to inform riders of service changes

Task 4 - Step 3: Analyze your budget

The current budget allows for Santa Rosa CityBus to continue with all current efforts to provide language assistance to all users of the fixed route and ADA paratransit services. The language assistances measures listed in Task 4 - Step 2 are also feasible in the current budget.

Task 4 - Step 4: Consider cost-effective practices for providing language assistance

Cost-effective practices for providing language services that the Transit Division has pursued or may pursue include

- Continue the practice of including both English and Spanish information on all printed materials, rather than printing separate pieces in each language.
- Target social media posts to reach Spanish speakers within Santa Rosa and neighboring communities
- Partnering with community organizations to assist with translation or interpretation
- Partnering with community organizations to assist with distribution of printed information to LEP individuals, or to provide educational or outreach opportunities to LEP individuals.
- Working with other City departments in their efforts to create a more inclusive community.

Staff also believes the measures identified in Task 4, Step 2, are highly cost-effective measures for improving the access of LEP individuals to Santa

Rosa CityBus and Santa Rosa Paratransit services.

IV. Providing Notice to LEP Persons Regarding the Availability of Language Assistance

CityBus has posted notices informing riders and other members of the public of the availability of free language assistance and how to access it. The notice is provided in English and Spanish and posted at the following locations

Inside buses (car cards)

Transit Operations Building

Downtown Transit Mall

Major transfer hubs

CityBus website

The notice is provided to all Transit Division and staff, as well as staff of the paratransit contractor. The notice will be distributed during community outreach activities and forwarded to community partners who work with LEP individuals.

As part of monitoring this Language Assistance Plan, the Transit Division will periodically review whether this notice should be provided in additional languages.

V. Staff Training

The Transit Division will deliver an annual training for front line staff that will include:

- A summary of the Transit Division’s responsibilities under the DOT LEP Guidance,
- A summary of the Language Assistance Plan,
- A description of the type of language assistance offered by the Transit Division and instructions for accessing these services, and
- Strategies for working effectively with Limited English Proficient individuals and Spanish-speaking LEP individuals in particular.

Front line staff include:

- Bus operators
- Field Supervisors
- Customer Service Staff
- Transit Service Representatives

- Paratransit Supervisors
- Transit Superintendent
- Transit Planners
- Paratransit Operators
- Paratransit Customer Service Staff

In developing the training, the Transit Division may make use of the training resources identified in the DOT LEP Guidance. Training for paratransit front line staff be delivered in coordination with the paratransit contractor.

VI. Monitoring, Updating, and Evaluating the Language Assistance Plan

At a minimum, the Language Assistance Plan will be evaluated and updated every three years to coincide with submittal of the CityBus Title VI Program to the Federal Transit Administration. In the interim, monitoring activities may identify changes that should be made to the Language Assistance Plan. Monitoring activities will include evaluation of the following information:

- Needs identified by front line staff during employee training activities related to Limited English Proficiency or in the course of day-to-day operations of the system;
- Needs identified by community partners or LEP individuals during outreach activities or other engagement with staff;
- Changes to City policy that affect the dissemination of information in languages other than English to the public and;
- New data related to LEP populations in the CityBus service area.

If evaluation of new information received during monitoring of the plan leads to substantive changes in language assistance policies or practices, the Language Assistance Plan will be updated accordingly.

