

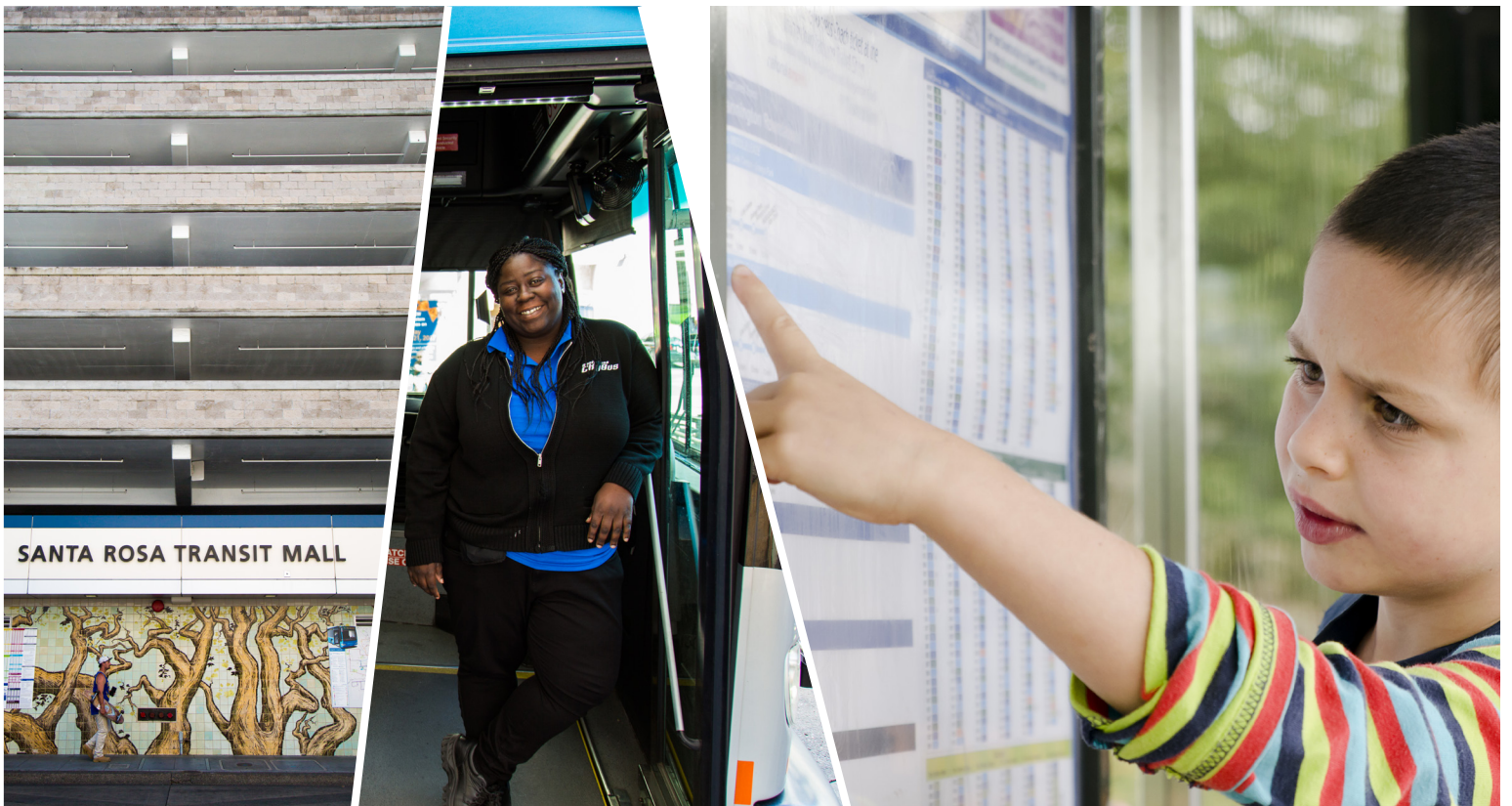
Language Assistance Plan

2025



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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 to use in the future.

II. Background

Title VI of the Civil Rights Act of 1964 states 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.

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 February 2025 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	18
Paratransit Operation	9
Customer Service Staff	1
Operations Supervisor	7
Administrative Staff	7
Other	5
Total	47

Staff were also surveyed about the frequency of their interactions with LEP individuals. Table 2 ranks 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	1	5	6	6
Paratransit Operation	6	1	2	0
Customer Service Staff	0	1	0	0
Operations Supervisor	4	2	1	0
Administrative Staff	5	1	1	0
Other	5	0	0	0
Total	21	10	10	6

Fixed route operations staff proportionally have the most interactions with LEP individuals. A third of fixed route operations staff stated having 40 or more interactions with LEP individuals.

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 just over 60 percent of responding 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	14	2	2
Paratransit Operation	7	1	1
Customer Service Staff	1	0	0
Operations Supervisor	4	3	0
Administrative Staff	4	2	1
Other	0	4	1
Total	30	12	5

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 2023 ACS 5-Year Estimates.

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

Table 4 provides a ranking of languages spoken in the CityBus service area by their population size. The most significant non-English language populations speak Spanish, Other Indo-European Languages, Other Asian and Pacific Island languages.

Table 4: Language Populations Spoken in Santa Rosa Ranked

Language Spoken at Home	Estimate
Speak only English	110,694
Spanish:	44,340
Other Indo-European languages:	2,835
Other Asian and Pacific Island languages:	2,232
Tagalog (incl. Filipino):	1,581
Vietnamese:	1,485
Chinese (incl. Mandarin, Cantonese):	1,260
Other and unspecified languages:	1,029
French, Haitian, or Cajun:	927
German or other West Germanic:	841
Arabic:	539
Korean:	437
Russian, Polish, or other Slavic languages:	325

U.S. Census Bureau, 2023 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 languages spoken in Santa Rosa. This is unsurprising as staff indicated Spanish as the predominant language they encounter on a day-to-day basis.

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

Almost half (46%) of Spanish speakers speak English less than “very well” as seen in Table 5. Individuals speaking English less than very well for Chinese and Vietnamese make up 69% and 81% of those populations respectively. Vietnamese specifically meets the Safe Harbor threshold with a population of 1,045 individuals speaking English less than very well. This is a dramatic jump from the previous plan.

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

Language Spoken at Home	Estimate
Total:	168,525
Speak only English	110,694
Spanish:	44,340
Speak English "very well"	23,992
Speak English less than "very well"	20,348
French, Haitian, or Cajun:	927
Speak English "very well"	746
Speak English less than "very well"	181
German or other West Germanic languages:	841
Speak English "very well"	738
Speak English less than "very well"	103
Russian, Polish, or other Slavic languages:	325
Speak English "very well"	297
Speak English less than "very well"	28
Other Indo-European languages:	2,835
Speak English "very well"	1,862
Speak English less than "very well"	973
Korean:	437
Speak English "very well"	146
Speak English less than "very well"	291
Chinese (incl. Mandarin, Cantonese):	1,260
Speak English "very well"	657
Speak English less than "very well"	603
Vietnamese:	1,485
Speak English "very well"	440
Speak English less than "very well"	1,045
Tagalog (incl. Filipino):	1,581
Speak English "very well"	982
Speak English less than "very well"	599
Other Asian and Pacific Island languages:	2,232
Speak English "very well"	1,442
Speak English less than "very well"	790
Arabic:	539
Speak English "very well"	366
Speak English less than "very well"	173

Language Spoken at Home	Estimate
Other and unspecified languages:	1,029
Speak English "very well"	720
Speak English less than "very well"	309

U.S. Census Bureau, 2023 American Community Survey 5-Year Estimates (Table C16001 Language Spoken at Home for Population 5 Years and Older)

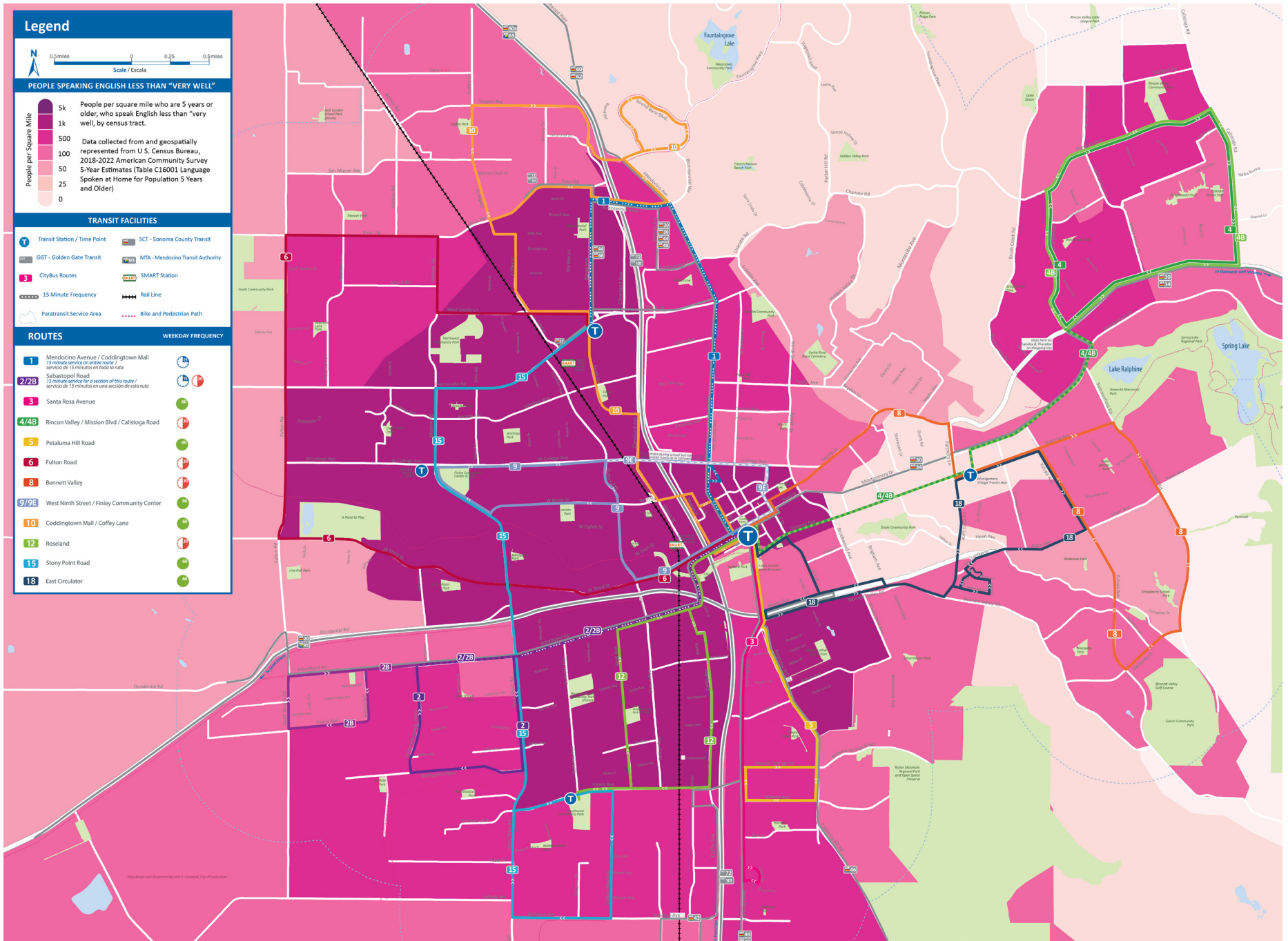
Task 1 - Step 2D: Identify any concentrations of LEP persons within your service area

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. This pattern is consistent with the last plan but there are more higher concentrations of LEP populations, specifically in the area between Guerneville Rd and Highway 12. This concentration also extends northward along Highway 101 almost reaching the tip of CityBus’s service area. One can also see a dense cluster in the downtown and 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 1: People 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 33 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 4,710 students. Vietnamese speakers represent the second highest population albeit at much lower numbers. However, even with low numbers this trends with the population seen in the full census numbers.

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

Language Spoken	Population
Spanish	4,710
Vietnamese	68
Other non-English languages (Uncoded)	64
Mon-Khmer languages (Cambodian)	56
French	42
Philippine languages	36
Panjabi; Punjabi	24
Tigrinya	24
Mandarin (Putonghua, Guoyu)	22
Fijian	20
Russian	20
Lao	18
Portuguese	14
Cantonese	12
Arabic	10
Haitian; Haitian Creole	10
Nepali	10
Persian (Farsi)	10
Thai	10
Hindi	8
Turkish	6
Italian	4
Korean	4

Language Spoken	Population
Samoaan	4
Bengali	2
Central American Indian languages	2
Gujarati	2
Hmong; Mong	2
Japanese	2
Otomian languages (Mixteco)	2
Swahili	2
Taiwanese	2
Urdu	2
Kikuyu (Gikuyu)	1
Cebuano (Visayan)	1
Swahili	1
Mixteco	1

California Department of Education, Educational Demographics office 2023-24 data

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 Communications and Intergovernmental Relations 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 50+ 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 via phone from staff, CityBus was only able to collect ten responses during the two-week period the survey was active. Staff did have an in-depth conversation about community needs with the City’s Community Engagement Manager. She provided insight into what CityBus can do to broaden

communication specifically using Spanish language radio and placing more material at community gathering locations.

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.

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”. Vietnamese was not encountered by any of the respondents.

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 varies from person to person. Interactions 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. However, this differs from the feedback directly from the public who stated they were able to easily find information on transit. Staff 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. When it came to working with Asian populations organizations

suggest always providing the material in English and they would translate as needed due to wide array of dialects spoken within those communities. New types of information recommended in Task 4 will need to be scrutinized for their clarity in English to ensure ease of translation into other languages.

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 20 unique responses. Of those 20 responses, 80% stated they spoke English less than very well with roughly the same amount (76%) stating that they had the same ability to read English.

Respondents were asked how well they were able to understand information that CityBus provides. Almost 90% of respondents stated they were able to get the information they needed all the time or most of the time.

Riders also indicated their preferred information source for service changes and how they plan their trip. Similar to the last plan update most respondents got most of their information from either bus operators or the customer service staff at the Transit Mall.

In the last year CityBus has been encouraging riders to use the Transit App for real-time information and trip planning. It was the preferred tool of respondents for this purpose showing the messaging is working and that riders find the app useful.

Respondents were ask to provide free form feedback on what CityBus can do to better provide information. May of the comments were positive and stated that material was easily accessible and properly translated.

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 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 (Code of Conduct)
- 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. CityBus now has two full-time over the phone customer service staff members that are fluent in Spanish as well as two Transit Service Representatives that are fluent.
- All bus stop signs display information in both English and Spanish.
- Regional wayfinding efforts will have Spanish translation and will also harmonize coloring and icons across all Bay Area transit services.
- 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 CityBus website SRCityBus.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.
- Apps riders can use for trip planning translate into the user's native phone language.

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 (1,045) is Vietnamese speakers. These populations are within the "Safe Harbor" threshold (5% of the service area population or 1,000 individuals, whichever is less).

Given the findings of this analysis, CityBus will need to consider how it will translate material into Vietnamese. Due to the small population size it is unlikely that all 1,045 individuals ride CityBus. CityBus plans to add language to all its vital documents in Vietnamese indicating that we will translate all documentation into Vietnamese upon request. We will also inform speakers in Vietnamese that language interpretation and translation is available through our customer service 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. This specifically includes a push to use app based technology that can provide information to the user in the language they have set natively to their phone.
- Review all translated materials to ensure the information is presented in language that is simplified and accessible to readers of various levels of formal education. This is inclusive of the verbiage informing individuals that Vietnamese is available upon request.

- Training for staff in the basics of communicating with Spanish-speakers.
- Additional bus schedule information at key bus stops.
- Posting or distributing 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.
- Use Spanish language radio to send out information.
- Post more material at community gathering locations.

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. Additional funds are available to expand translation, specifically into Vietnamese where needed. 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.
- Investigating incorporating the use of translation apps for frontline staff interactions with customers.

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. CityBus will add Vietnamese to these posts. This information is 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.