







# Orange County Transportation Authority Limited English Proficiency Plan



# ORANGE COUNTY TRANSPORTATION AUTHORITY LIMITED ENGLISH PROFICIENCY PLAN April 2012

The *Orange County Transportation Authority (OCTA) Limited English Proficiency Plan* has been prepared to address OCTA's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English proficiency. Individuals who have a limited ability to read, write, speak, or understand English are limited English proficient or "LEP." Under Executive Order 13166, OCTA is federally mandated to take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of its programs and activities to individuals who are LEP. OCTA utilized the U.S. Department of Transportation's (DOT) LEP Guidance Handbook and performed a Four Factor Analysis to develop the OCTA LEP Plan.

The DOT maintains that public transit agencies can retain LEP ridership even after they become proficient in English if his/her experience with public transportation is positive. Additionally, the Federal Transit Administration (FTA) has determined that conducting a LEP needs assessment based on a Four Factor Analysis ensures that a transit agency can know and understand the LEP population in its service area and be in a better position to implement a cost-effective mix of language assistance measures that target resources appropriately.

#### **Four Factor Analysis**

The DOT Four Factor Analysis provides guidance to transit agencies receiving federal financial assistance in taking reasonable steps to ensure meaningful access to all of its services, programs, and activities utilized by LEP persons. The DOT guidance states transit agencies will provide written translation of vital documents for each eligible LEP language group that meets the Department of Justice (DOJ) Safe Harbor provision of five percent of the population or 1,000 persons, whichever is less, identified as a limited English proficiency speaker within the service area. Such practices will be considered strong evidence of compliance with the recipient's written-translation obligations. The DOT Four Factor Analysis assesses the following criteria:

- **Factor 1:** The number or proportion of LEP persons eligible to be served or likely to be encountered by an OCTA service, program, or activity;
- **Factor 2:** The frequency with which LEP individuals come in contact with the program, service, or activity;
- **Factor 3:** The nature or importance of OCTA services, programs, or activities provided to LEP individuals;
- **Factor 4:** The resources available to OCTA and the costs.

#### **FACTOR ONE**

The Factor One analysis documents the number or proportion of persons with limited English proficiency in Orange County, California, eligible to be served or likely to be encountered by an OCTA service, program, or activity. OCTA utilized various external data, such as the 2010 U.S. Census, the American Community Survey, statistics from the Department of Education, and the Orange County Department of Mental Health. In addition, internal data sources, such as requests for translation services and surveys, are utilized to determinate the approximate number of LEP persons age 5 years and older.

OCTA defines a LEP person as those individuals limited by the ability to speak English less than "very well" or "not at all" as reported by the U.S Census Bureau. The following tables were utilized to determine the number of LEP persons eligible to be served, or likely to be encountered, by an OCTA service, program, or activity.

# EXTERNAL SOURCES – U.S. Census Bureau

Table 1 represents the racial break-down of Orange County according to the 2010 U.S. Census Bureau.

Table 1: Orange County Racial Break-Down Total Population 3,010,232

Race	Total Population	Population Percentage			
White - Non-Hispanic	1,328,499	44.1%			
Black	50,744	1.7%			
American Indian	18,132	0.6%			
Asian	537,804	17.9%			
Pacific Islander	9,354	0.3%			
Hispanic	1,012,973	33.7%			

Source: 2010 U.S. Census/2010 County of Orange Report on Race and Ethnicity.

Less than 1.8% of population is equal to persons of two or more races

The total population 5 years of age and older who speak English at home is 2,827,013 or 93.6 percent of Orange County's total population. The percentage of the Orange County population 5 years of age and older who speak English less than "very well' or "not at all" is approximately 604,854 persons or 21.4 percent of the population.

Table 2 represents the LEP speakers by language and the percentage of LEP persons in Orange County who meet the Department of Justice (DOJ) Safe Harbor provision of "every 1,000 speakers or five percent of the population whichever is less."

Table 2: LEP Speakers by Language in Orange County (Safe Harbor Provision) Total

Population 2,827,013 Age 5 Years and Older

	Total Number of	Speaks English Less Than "Very	Percent of Total Population	Percent of Total LEP
LANGUAGE	Speakers	Well"	(Age 5+)	Speakers
Spanish	749,710	367,299	26.5%	49.0%
Vietnamese (Asian/Pacific Islander)	163,207	100,797	5.8%	61.8%
Korean (Asian/Pacific Islander)	73,757	39,958	2.6%	54.2%
Chinese (Asian/Pacific Islander)	63,312	28,146	2.2%	44.5%
Tagalog (Asian Pacific Islander)	45,073	10,026	1.6%	22.2%
Persian (Indo-European)	32,639	9,457	1.2%	29.0%
Japanese (Asian/Pacific Islander)	16,564	8,431	0.6%	50.9%
Arabic (Indo-European)	14,741	5,529	0.5%	37.5%
Hindi (Indo-European)	10,713	1,555	0.4%	14.5%
French (Indo-European)	9,648	1,773	0.3%	18.4%
German (Indo-European)	7,688	1,078	0.3%	14.0%
Gujarati (Indo-European)	6,262	2,750	0.2%	43.9%
Mon-Khmer (Asian/Pacific Islander)	6,031	2,271	0.2%	37.7%
Urdu (Indo-European)	5,786	1,979	0.2%	34.2%
Russian (Indo-European)	4,673	1,534	0.2%	32.8%
Portuguese (Indo-European)	4,283	1,189	0.2%	27.8%

Thai (Asian/Pacific Islander)	2,724	1,229	0.1%	45.1%
African Languages	2,554	1,225	0.1%	47.9%
Laotian (Asian/Pacific Islander)	2,364	1,408	0.1%	59.6%

Source: B16001: LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER - Universe: Population 5 years and over 2010 American Community Survey 1-Year Estimates

Nineteen languages meet the DOJ Safe Harbor threshold of 1,000 speakers, while only two languages meet the five percent threshold. The two languages which meet both criteria are Spanish at 26.5 percent and Vietnamese at 5.8 percent of the LEP population that speaks English less than "very well" or "not at all" in Orange County.

Table 3 identifies the native and foreign born populations and their ability to speak English for the population 5 years and older.

Table 3: Selected Characteristics of the Native & Foreign Born Populations

Language Spoken at Home and Ability to Speak English For Populations 5 Years and Over							
	Total	Percentage	Native Born	Percentage	Foreign Born	Percentage	
Population	2,827,013	93.6%	1,912,407	67.6%	914,606	32.4%	
English Only	English Only 1,546,376 54.7% 1,457,254 76.2% 89,631 9.8%						
English Less Than "Very 604,854 21.4% 84,145 4.4% 521,325 57.0% Well"							

Source: U.S. Census Bureau, 2010 American Community Survey – 1 Year Estimates

As indicated in Table 3, the total native born population is double that of the foreign born population. However, the percentage of the foreign born LEP population is approximately fourteen times higher than that of the native born LEP populations.

Table 4 identifies the population 5 years and older who live in linguistically isolated households. A **linguistically isolated household** is one in which "no member 14 years old and over (1) speaks only English or (2) speaks a non-English language and speaks English less than "very well." In other words, all members 14 years old and over have at least some difficulty with English.

**Table 4: Linguistically Isolated Households** 

Language Spoken at Home for the Population 5 Years and Over in Linguistically Isolated Households					
Language	Total 324,603	Percentage 11.5%			
English Only	2,365	0.7%			
Spanish Only	196,786	60.6%			
Indo-European Only	14,599	4.5%			
Asian/P/I Only	105,694	32.6%			
Other Only	5,159	1.6%			

Source: U.S. Census Bureau, 2009 American Community Survey – 1 Year Estimates

As indicated in Table 4, the predominate languages spoken in linguistically isolated households in Orange County are Spanish at 60.6 percent and Asian/Pacific Islander at 32.6 percent.

# **EXTERNAL SOURCES - Department of Education**

Table 5 represents the three major universities located in the central, north, and south sections of Orange County by ethnicity, as compared to Orange County ethnicity statistics.

Table 5: Ethnicity Comparison – Major Universities Located in Orange County

Race	Cal State University	University of	Chapman	Orange
	Fullerton	Irvine	University	County
American Indian/Alaskan Native	<1%	<1%	1.2%	<1%
Asian	22%	49.1%	8.1%	17.9
African American	3%	1.9%	5.2%	1.7%
Hispanic	34%	17.9%	13.7%	33.7%
Native Hawaiian/Pacific Islander	<1%	<1%	0.0%	<1%
White	29%	20.0%	64.5%	44.1%

Table 6 represents an analysis of the number of English learners from kindergarten through the twelfth grade in Orange County. The school districts that have a minimum of 1,000 English learners enrolled have been cross referenced with the 19 LEP languages in Orange County to identify the number of English learners per district.

Table 6: Number of English Learners in Orange County Unified School Districts

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Language	Total	Capistrano	Garden Grove	Irvine	Newport Mesa	Orange	Placentia Linda	Saddleback Valley	Santa Ana	Tustin
Spanish	72,934	4,598	14,102	413	5,039	6,967	2,863	3,446	30,853	4,653
Vietnamese	7,341	49	6,116	179	59	361	71	92	302	112
Korean	1,455	55	173	856	19	47	79	40	5	181
Chinese	1003	55	138	537	9	45	54	55	22	88
Tagalog	560	78	108	51	26	65	27	134	23	48
Persian	810	207	7	396	22	41	9	77	4	47
Japanese	568	40	15	385	27	14	7	37	0	43
Arabic	519	61	90	169	24	64	43	40	5	23
Hindi	189	17	11	127	1	4	4	10	2	13
French	74	14	3	33	7	6	0	6	1	4
German	58	12	3	26	10	2	0	2	0	3
Gujarati	104	5	4	24	1	20	27	13	1	9
Mon-Khmer	181	3	46	6	3	25	3	1	75	19
Urdu	142	8	25	59	1	20	5	6	3	15
Russian	177	38	2	59	17	9	7	25	3	17
Portuguese	59	15	5	9	13	3	4	8	0	2
Thai	54	9	10	12	4	6	5	3	4	1
Laotian	59	0	37	2	2	5	0	1	10	2
Total	86287	5,264	20,895	3,343	5,284	7,704	3208	3,996	31,313	5,280

2012 California Department of Education tabulation table "English Learners by Language and Grade"

There are twelve unified school districts in Orange County. As identified in Table 6, nine of the twelve districts have students classified as English learners with a population of over 1,000 enrolled students. Spanish, Vietnamese, Korean, and Chinese are the four languages identified in the Orange County unified school districts with over 1,000 students enrolled who are classified as

English learners. The cities of Garden Grove and Santa Ana have over 10,000 English learners enrolled in the 2010-2011 school year who speak Spanish. Table 6 also indicates a high population of Asian (Korean, Chinese, and Japanese) and Middle Eastern (Persian and Arabic) English learners in the city of Irvine.

# EXTERNAL SOURCES - County of Orange Statistics - Department of Health

# **MEDI-CAL POPULATION**

The Orange County Health Care Agency published the 2011 Orange County Geographic Health Profile in which the demographic profile for Medi-Cal recipients was analyzed. Medi-Cal is the California implementation program for the federal Medicaid program. Based on the June 2010 eligibility rolls, there were almost half a million (414,915) persons eligible for Medi-Cal in Orange County. As shown in table seven below, 62 percent of persons eligible for Medi-Cal speak a language other than English, with Spanish speakers leading at 45 percent, followed by a small percentage of Vietnamese speakers.

Table 7: Medi-Cal Eligibles by Primary Language Spoken

English	Spanish	Vietnamese	Other	Total
157,773	186,178	45,392	25,572	414,915
38%	45%	11%	6%	100%

2011 Orange County Geographic Health Profile

The demographic profile shows the percentage of Medi-Cal Eligibles who speak a language other than English are Spanish speakers at 45 percent, followed by Vietnamese speakers at 11 percent, and approximately 6 percent of the Eligibles speaking some other language. In addition, two cities had ZIP codes which accounted for approximately half (48 percent) of the total Spanish speaking Medi-Cal Eligibles in Orange County: Santa Ana (92704, 92703, 92701, and 92707) and Anaheim (92805). For Vietnamese speaking persons, nine ZIP codes in five cities had ZIP codes that accounted for 92 percent of the total Vietnamese speaking Medi-Cal Eligibles in Orange County: Westminster (92683), Garden Grove (92843, 92844, 92840, and 92841), Santa Ana (92704, 92703), Anaheim (92804), and Fountain Valley (92708).

# **DEPARTMENT OF MENTAL HEALTH – Cultural Competency Plan**

Orange County has had a lengthy history of fostering cultural competency and cultural diversity. Moreover, cultural considerations in delivery of service were brought to the forefront in 2004, when California voters passed the Mental Health Services Act (MHSA). To implement the MHSA, comprehensive and inclusionary community planning processes have been utilized to develop plans that would improve access to services for underserved groups and provide a culturally sensitive environment for clients of all races, ethnicities, cultures, and languages.

The County of Orange Health Care Agency Behavioral Health Services published the 2010 Cultural Competency Plan in response to the MHSA implementation initiatives. The Cultural Competency Plan indicated, according to the California Department of Finance, between the years 2000 to 2008, the percentage of Orange County residents who are Hispanic increased from 30.8 percent to 35.1 percent. For Asian residents, the percentage of the population increased from 13.8 percent to 15.6 percent during the same period. For the White non-Hispanic population, the percentage has declined from 51.5 percent to 42.6 percent. The California Department of Finance report also indicated that from 2008 to 2010 languages such as Farsi and Korean have emerged as DOJ Safe Harbor threshold language.

#### **SUMMARY OF EXTERNAL DATA SOURCES**

There were several key findings revealed in the analysis of the external data sources:

- Approximately 21.4 percent of Orange County's population speaks English less than "very well."
- More than 914,606 persons or 32.4 percent of the Orange County region are foreign born of which approximately 57 percent are identified as LEP.
- Approximately 324,603 persons of 11.5 percent ages five and older live in linguistically isolated households in which 60.6 percent are Spanish speakers and 32.6 percent are Asian/Pacific Islanders.
- Spanish is the second most predominant language other than English spoken in Orange County.
- Vietnamese is the third largest language spoken by LEP persons in Orange County.
- Various Asian/Pacific Islander languages such as Korean, Chinese, and Tagalog have emerging limited English proficiency needs.
- The cities of Garden Grove and Santa Ana have the largest segment of English learners enrolled in Orange County public school system.
- Garden Grove is also home to the second highest English learner population for students kindergarten through the twelfth grade to which Vietnamese is the predominate language.
- Hispanic and Asian populations have increased on average approximately 2 percent while the Caucasian population has decreased approximately 8 percent in Orange County.
- The cities of Garden Grove and Santa Ana were consistently identified as areas requiring LEP services for health care services and education.

## **INTERNAL SOURCES**

# **OCTA Customer Relations - Request for Translation Services**

A report was generated by the telephonic translation services vendor, Language Line Services, capturing two years of data that identified the number of requests for translation services as provided by OCTA's 714-636-RIDE Customer Relations phone number. In 2010, OCTA received three requests for language translation assistance once in each of the following languages: Korean, Hindi, and Spanish. In 2011 a total of six callers requested language translation services in the following languages: Vietnamese (3), Korean (1), Mandarin (1), and Spanish (1).

#### 2011 OCTA Customer Satisfaction Survey

The 2011 Customer Satisfaction Survey was conducted to measure OCTA's customers' overall satisfaction with their bus riding experience, as well as how customers perceive OCTA's bus service is meeting their travel needs. The 2011 Customer Satisfaction Survey study profiled customers' travel behavior, including frequency and timing of use, and trip purpose. Ridership demographic information was collected and customers' preferences concerning usage for various OCTA communication strategies were evaluated.

OCTA identified key bus stops by supervisorial district which also included average daily boardings at each stop. The Customer Satisfaction Survey forms were distributed to bus riders at these selected bus stops throughout Orange County. Approximately 15,000 survey forms were printed (11,000 in English, 3,500 in Spanish, and 500 in Vietnamese), and 10,800 were actually distributed to potential respondents. A total of 1,954 completed surveys were returned. Based upon those who

accepted a survey form at the bus stops, this represents a response rate of 18 percent. This sample yields a margin of error of +/- two percent at the 95 percent level of confidence.

The survey revealed the dominant languages by which riders preferred to receive bus information is English (61 percent) and Spanish (35 percent). Nearly three-fourths (72 percent) of all surveys returned were completed in English. Surveys returned in Spanish comprised 27 percent, and one percent of the surveys returned were completed in Vietnamese.

Respondents to the 2011 Customer Satisfaction Survey also revealed students who attend both school and work are located in Santa Ana (33 percent), followed by Fullerton (17 percent) and Anaheim (10 percent). The survey results reflect the high number of LEP English learners enrolled in the public school system in the City of Santa Ana.

#### **OCTA Website Review**

An analysis was conducted to review the requests for translation conversion for the OCTA website. Two reports identified the following requests for translation conversion data.

## • Number of Request per Month – Manual Request

A report was generated by OCTA's web support vendor Fresh Interactive which identified the number of times a desktop user manually requested the conversion of the OCTA website from English into another language. While the specific languages were not identified, on average, the request to manually convert the OCTA website into a language other than English was once per day or 29 times during the month of January 2012.

# • Computer to Computer Interface Translation

Microsoft Windows pre-installs a Language Interface Pack (LIP) on all licensed copies of Windows XP, Windows 7, and Vista software. The interface equips the user with the ability to change his/her computer's language into over 80 languages in order to customize the user's desktop into his/her own native language. The software has been developed in response to emerging minority language desktop user's needs. Windows 7 and Vista Ultimate include the ability to install multiple user interface languages and switch between them.

A report was generated by OCTA's web support vendor Fresh Interactive which identified the number of times the language interface was utilized and in what language for a one month period of time on the OCTA website. The results of that report are listed in Table 8.

**Table 8: Computer to Computer Interface** 

Language	Visits per Month
Spanish	748
Japanese	611
Chinese	591
Korean	466
French	211
German	222
Portuguese	113

#### **SUMMARY OF INTERNAL DATA SOURCES**

There were several key findings revealed in the analysis of OCTA internal data/information:

- Approximately 48 percent of the population sixteen years of age and older who take public transportation to work are Spanish speaking LEP individuals.
- Korean is the most requested language for translation services through the OCTA Customer Relations 714-636-RIDE.
- Working students who are English learners primarily live and attend school in the cities of Santa Ana, Garden Grove, and Fullerton.
- LEP populations are accessing the OCTA website using Computer to Computer Language Interface software in order to obtain information at a surprising high level.
- Japanese is the second highest language to access the OCTA website using the Computer to Computer Language Interface option.
- OCTA's website translates into another language on average once per day.

## **Coach Operator Survey**

With the results of the OCTA 2011 Customer Satisfaction Survey available, the Coach Operator Survey has been postponed until June 2012. Coach Operators will be surveyed in response to the number of riders he/she encounters daily who are LEP, the segment of the service area in which he/she encountered a LEP passenger, the request for services/information by LEP persons, the languages commonly spoken by LEP riders, and other languages spoken by the Coach Operator. The results of the Coach Operator Survey are anticipated to be available by September 2012.

# **FACTOR TWO**

The Factor Two analysis documents the frequency with which LEP individuals come in contact with OCTA's programs, service, or activity.

## **EXTERNAL RESOURCES**

Table 9 represents the population in Orange County who travel to work by means of public transportation and the ability to speak English.

**Table 9: Means of Transportation to Work** 

Means of Transportation to Work by Language Spoken at Home and Ability to Speak English						
	Total	Percentage				
Public Transportation 40,219 2.9%						
Speaks Spanish						
Speaks English - less than "very well" 19,515 48.5%						
Speaks other Languages						
Speaks English – less than "very well"	1,537	0.4%				

Source: U.S Census Bureau 2009 American Community Survey 1-Year Estimates

Approximately 40,219, or 2.9 percent, of the working population 16 years and over utilize public transportation as a means of transportation to work. Approximately 19,515, or 48.5 percent, are Spanish speakers and 1,537, or 0.4 percent, are speakers of other languages who speak English less than "very well."

#### **INTERNAL RESOURCES**

The 2011 Customer Satisfaction Survey was conducted to measure general bus usage. Respondents were very frequent users of OCTA bus services, with 82 percent using the bus four to seven days per week and another 15 percent using the bus one to three days per week. Of the more frequent riders, 38 percent were employed full-time and 22 percent were employed part-time, particularly in the service, hospitality, and retail sectors. Respondents who were less frequent riders (less than 4 days per week) were more widely spread across the employment spectrum and included homemakers, students, and disabled residents. Respondents in the survey appeared to be long-term riders of OCTA buses with 62 percent having been riders for at least four years. The most important reason (42 percent) respondents indicated for riding OCTA buses instead of using alternative modes was the inability to afford to purchase or maintain an automobile. The second highest rated reason (23 percent) was the lack of a driver's license or the inability to drive.

## **FACTOR THREE**

The Factor Three analysis documents the nature or importance of OCTA services, programs, or activities provided to LEP individuals. OCTA is a state-mandated, countywide transportation agency. OCTA was formed in 1991 to create, fund and improve the quality of life for Orange County. OCTA delivers efficient transportation programs that reduce traffic congestion and improve mobility. OCTA is the major provider of urban public transportation in the County of Orange. OCTA provides important transit services to the public through its fixed route and paratransit ACCESS programs. OCTA is the only major public transportation provider in Orange County and provides bus service between Metrolink stations and connecting routes to Los Angeles, Riverside, and San Diego transit agencies.

The 2011 OCTA Customer Satisfaction Survey revealed that Orange County residents utilizing the transportation services for the purpose of commuting to work has decreased ten percent from the previous 2007 survey, while personal errands (16 percent vs. 9 percent) and public services (9 percent vs. 5 percent) has increased in frequency.

#### **FACTOR FOUR**

The Factor Four analysis documents the resources available to the recipient of federal funds to assure meaningful access to the service by LEP persons.

OCTA's External Affairs Division ensures that OCTA information is available in Spanish regarding services, programs, and activities including surveys, bus routes and fares, public service announcements and information on the buses, as well as in the Administrative Office buildings and OCTA Store. Press releases and public service announcements are provided to Spanish and Vietnamese language print and broadcast media, as well as in Chinese and Korean when required. Language interpreters are made available upon request. OCTA has allocated \$15,000.00 in the FY 2011-2012 Budget for additional language services, as needed. In addition, in January 2012, the External Affairs Division updated the OCTA website with the capability for translating website information into the following 17 languages: Spanish, Vietnamese, Korean, Chinese (simplified), Chinese (Traditional), Tagalog (listed as Filipino), Persian, Japanese, Arabic, Hindi, French, German, Gujarati, Urdu, Russian, Portuguese, and Thai.

OCTA's Customer Relations Department, which manages customer comments by phone, mail, email, and in-person currently benefits from staff members who speak Spanish and/or Vietnamese. The Customer Relations team also utilizes translation services provided by AT&T for customers who speak other languages, providing OCTA with the ability to communicate with over 160 different

languages. The OCTA Store, which makes available bus passes and is an informational source for the general public on transit information, is also manned by a representative who speaks Spanish.

OCTA's Customer Information Center (CIC) is a telephone-based information service that manages customer inquiries primarily concerning bus transit trip generation. The CIC is a procured service operated by a firm which has satisfied all agency Disadvantaged Business Enterprise, Minority Business Enterprise, and Women Business Enterprise requirements. Currently, the CIC employs thirty-four agents, of which fourteen are bilingual Spanish speaking. The CIC also utilizes the translation services provided by AT&T, as needed.

Vital documents are defined as those documents without which a person would be unable to access services. The following are written communications that are printed in both English and Spanish:

- OCTA Bus Book
- Temporary signs at bus stops informing customers of any detours or route changes
- Rider Alerts
- Interior bus posters and stickers displaying safety or system information
- Fare cards on fare boxes
- Independent and promotional brochures
- Onboard surveys
- Pass disclaimers
- Title VI Protection Notifications

## Implementation Plan:

Based on the four factor analysis, OCTA has identified the language needs and services required to provide meaningful access to information for the LEP residents of Orange County. OCTA will review its LEP Plan on an annual basis and incorporate LEP data gathering ventures, such as surveys, to further identify additional language area-specific needs for the top languages identified. A review of OCTA's relevant programs, activities, and services that are being offered or will be offered by OCTA as of April 2012 include:

- Spanish speaking translators are available upon request during normal business hours.
- Route and schedule brochures available in both English and Spanish.
- Route and schedule information available for translation in 17 languages on the OCTA website.
- A supplemental bus placard will be implemented in seven languages and pictographs to notify the beneficiaries of Title VI protection and the information to file a claim and/or receive additional information.
- OCTA conducted a Transit System Study rider survey in which the survey information was available in Spanish and Vietnamese.
- Outreach programs with various Spanish and Vietnamese speaking segments of the service area to discuss the Transit System Study.
- The subsequent language surveys will be distributed at community outreach events and evaluated to enhance language needs.
- Geographic Information System (GIS) maps have been developed identifying languages (with the exception of French and German) that meet the DOJ Safe Harbor provision by census tract with a minimum of 50 LEP persons. French and German do not have census tracts with a 50 speaker language minimum. (See attachments)

OCTA will actively and regularly contact the community organizations that serve LEP persons to identify any additional information or activities that might better improve OCTA's services to assure non-discriminatory service to LEP persons. OCTA will then evaluate the projected financial and

personnel requirements to provide the translation services and assess which of these can be provided most cost-effectively. The following is a list of community organizations that have been contacted or will be contacted to assist in gathering information about services most frequently sought by the LEP population:

- Ethnic Chamber of Commerce Asian Native
- Vietnamese Community of Orange County
- Korean Community Services
- Orange County Hispanic Chamber of Commerce
- Regional Center of Orange County
- Iranian Cultural Center of Orange County

## **Training Staff**

There are five primary groups of staff members who are critical to the LEP Plan: Coach Operators, Customer Relations Representatives, General Services staff, Executive Directors, and the External Affairs staff.

Coach Operators have the most frequent contact with a LEP person through daily interaction with passengers during fixed-route hours of operations. Customer Service Representatives and the General Services staff also have frequent contact with LEP persons, either in person at the OCTA administrative offices or by telephone.

In 2011, Title VI training was conducted during Annual Required Training (ART) for all Coach Operators. Title VI training topics included:

- Understanding Title VI responsibilities;
- The language assistance services offered by OCTA;
- Specific procedures to be followed when encountering a LEP person;
- Assisting passengers/members of the public in obtaining Title VI information, how to obtain complaint procedure information and translation services.

In March 2012, training was provided to the General Services staff. The General Services staff is most likely to encounter a LEP member of the public at the OCTA Administrative Offices. The General Services staff members are responsible for staffing the OCTA Administrative Office lobby and answering the main OCTA public access telephone number. The General Services staff members are responsible for directing "requests for assistance" telephone calls to the correct department. The Title VI training topics included:

- Understanding Title VI responsibilities
  - Location of Notification Brochures
  - o Location of Complaint Procedure & Forms
  - Verbal complaint procedure
- The language assistance services offered by OCTA;
- Specific procedures to be followed when encountering a LEP person;
- Assisting members of the public in obtaining translation services.

#### CONCLUSION

The LEP Plan is designed to be flexible and to be reviewed as an ongoing process. As such, it is important to consider whether new documents and services need to be made accessible for LEP persons and also to monitor changes in demographics, and types of services in those demographics. When changes occur, the LEP Plan will be updated as appropriate.

OCTA will post the LEP Plan on its website at <a href="https://www.octa.net">www.octa.net</a>. Copies of the LEP plan will be provided to any person or agency requesting a copy. LEP persons may obtain copies/translations of the LEP plan upon request.

Any questions or comments regarding this Plan should be directed to:

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