

# **Orange County Transportation Authority Limited English Proficiency Plan**

**Prepared for the Federal Transit Administration  
In accordance with Circular 4702.1B  
Executive Order 13166**

**Board of Directors Approved: September 24, 2018**



**Updated June 2018**

**ORANGE COUNTY TRANSPORTATION AUTHORITY**  
**Limited English Proficiency Plan**  
**Language Assistance Plan**  
**June 2018**

The *Orange County Transportation Authority (OCTA) Limited English Proficiency Plan (LEP) and Language Assistance 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. As defined in Executive Order 13166, 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 identify as 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 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. Examples of vital documents a notice of rights, complaint procedures and forms, and, ADA paratransit eligibility forms and information. Such practices will be considered strong evidence of compliance with the recipient's written-translation obligations for the Safe Harbor provision.

- Factor 1:** The number or proportion of LEP persons 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 number or proportion of LEP persons eligible to be served or likely to be encountered by an OCTA service, program, or activity.

OCTA defines a LEP person as those individuals limited by the ability to speak English less than "very well" 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 Data 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

Table 2 represents the number of LEP speakers by language 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: Orange County Number of LEP Speakers for DOJ Safe Harbor Provision**

	Orange County, CA Estimate	
Total:	2,983,659	Percentage
Speak only English	1,621,320	
Spanish:	777,491	
Speak English less than "very well"	334,492	11.2%
French (incl. Cajun):	11,148	
Speak English less than "very well"	1,783	0.06%
Haitian:	453	
Speak English less than "very well"	0	
Italian:	2,084	
Speak English less than "very well"	435	
Portuguese:	3,728	
Speak English less than "very well"	791	
German:	6,860	
Speak English less than "very well"	1,287	0.04%
Yiddish, Pennsylvania Dutch or other West Germanic languages:	2,556	
Speak English less than "very well"	144	
Greek:	3,281	
Speak English less than "very well"	634	
Russian:	7,942	
Speak English less than "very well"	3,143	0.11%
Polish:	1,940	
Speak English less than "very well"	949	
Serbo-Croatian:	1,148	
Speak English less than "very well"	164	
Ukrainian or other Slavic languages:	1,221	
Speak English less than "very well"	541	
Persian (incl. Farsi, Dari):	31,747	
Speak English less than "very well"	11,900	0.40%

Gujarati:	7,289	
Speak English less than "very well"	2,665	0.09%
Hindi:	11,293	
Speak English less than "very well"	2,645	0.09%
Urdu:	4,879	
Speak English less than "very well"	505	
Punjabi:	2,660	
Speak English less than "very well"	1,097	0.04%
Bengali:	1,449	
Speak English less than "very well"	144	
Nepali, Marathi, or other Indic languages:	5,455	
Speak English less than "very well"	905	
Other Indo-European languages:	6,249	
Speak English less than "very well"	1,900	
Telugu:	4,282	
Speak English less than "very well"	837	
Tamil:	5,268	
Speak English less than "very well"	857	
Malayalam, Kannada, or other Dravidian languages:	2,271	
Speak English less than "very well"	527	
Chinese (incl. Mandarin, Cantonese):	84,595	
Speak English less than "very well"	44,284	1.48%
Japanese:	15,792	
Speak English less than "very well"	6,956	0.23%
Korean:	74,010	
Speak English less than "very well"	42,081	1.41%
Hmong:	572	
Speak English less than "very well"	245	
Vietnamese:	180,840	
Speak English less than "very well"	107,103	3.59%
Khmer:	5,534	
Speak English less than "very well"	2,374	0.08%
Thai, Lao, or other Tai-Kadai languages:	4,802	
Speak English less than "very well"	2,388	0.08%
Other languages of Asia:	3,168	
Speak English less than "very well"	1,431	
Tagalog (incl. Filipino):	45,783	
Speak English less than "very well"	12,106	0.41%
Ilocano, Samoan, Hawaiian, or other Austronesian languages:	9,844	
Speak English less than "very well"	2,560	0.09%
Arabic:	25,961	
Speak English less than "very well"	8,344	0.28%
Hebrew:	2,257	
Speak English less than "very well"	271	
Amharic, Somali, or other Afro-Asiatic languages:	1,548	
Speak English less than "very well"	644	
Yoruba, Twi, Igbo, or other languages of Western Africa:	467	
Speak English less than "very well"	252	
Swahili or other languages of Central, Eastern, and Southern Africa:	208	
Speak English less than "very well"	0	
Navajo:	0	
Speak English less than "very well"	0	
Other Native languages of North America:	0	
Speak English less than "very well"	0	

Other and unspecified languages:	1,664	
Speak English less than "very well"	310	

B16001 Source: U.S. Census Bureau, 2016 American Community Survey 1-Year Estimates

Based on a decline in Orange County population identified in the 2016 American Community Survey, Spanish is the only language that meets the DOJ Safe Harbor threshold five percent of the LEP population that speaks English “less then very well”. The sixteen additional languages meet the 1,000 speaker threshold criteria of the LEP population that speaks English less than “very well” or in Orange County. The sixteen languages identified as the 1,000 LEP speaker threshold are as follows: French, German, Russian, Farsi, Gujarati, Hindi, Punjabi, Chinese, Japanese, Korean, Vietnamese, Khmer, Thai, Tagalog, Ilocano, and Arabic.

Table 3 represents a five (5) year comparison of the English learners by number and percentage with reference to the primary language spoken by English learners in Orange County public schools.





















**Table 3: Orange County Public School Number/Percentage of LEP Learners by Language**



















































Languages of English Learners by Number and Percentage					
Language	2012-13	2013-14	2014-15	2015-16	2016-17
All Other	6,488	7,394	7,520	7,496	7,725
	1.3%	1.5%	1.5%	1.5%	1.6%
Arabic	1,555	1,772	2,026	2,133	2,308
	0.3%	0.4%	0.4%	0.4%	0.5%
Tagalog	1,089				
	0.20%				
Korean	2,935	3,205	3,160	3,006	2,965
	0.6%	0.6%	0.6%	0.6%	0.6%
Mandarin		1,393	1,857	2,306	2,753
		0.3%	0.4%	0.5%	0.6%
Spanish	100,965	106,022	103,706	97,911	93,80
	20.3%	21.2%	20.9%	19.9%	19.1%
Vietnamese	10,213	10,784	11,121	10,149	9,756
	2.1%	2.2%	2.2%	2.1%	2.0%
<b>Total</b>	<b>123,245</b>	<b>130,570</b>	<b>129,390</b>	<b>123,001</b>	<b>119,315</b>

A total of 2,664,921 California public school students (English Learners and Fluent English Proficient) speak a language other than English in their homes. This number represents about 42.8 percent of the state's public school enrollment. This graph displays the number of students speaking each of the top five non-English languages in Orange County 2012 through 2017 K-12<sup>th</sup> grade.  
<http://www.cde.ca.gov/ds/sd/cb/cefelfacts.asp>

Table 4 represents the languages and vital documents the County of Orange translates for the County’s Health Care Agency’s Medi-Cal Mental Health Services program.

**Table 4: County of Orange Medi-Cal Translated Vital Documents Available by Language**

Title	Arabic	English	Farsi	Korean	Spanish	Vietnamese
Advance Health Care Directives (F346-705)						
Grievance or Appeal Form (F346-706)						
Grievance & Appeal Process Posters						
Authorization to Use and Disclose						

Protected Health Information (F346-531B)					
Consent to Record (F346-474)					
Mental Health Plan Intake/Advisement Checklist (F346-753)					
Mental Health Plan Provider List (Directory)					
Psychiatric Medication Consent (F346-7921)					
Informed Consent for Services (F346-301)					
Notice of Action A (F346-737)					
Notice of Action B (F346-738)					
Notice of Action C (F346-787)					
Notice of Action D (F346-786)					
Notice of Action E (F346-785)					

OC.gov.com 2016 Statistics

### **Internal Data Source**

During the period January 1, 2015 through February 2018 OCTA received 277 requests for language translation assistance in a language other than English through the Customer Relations department. The cumulative requests for assistance in each language were as follows:

<b><u>Language</u></b>	<b><u>Number of Requests</u></b>
Arabic	6
Burmese	2
Egyptian Arabic	1
Farsi	11
Hindi	3
Korean	8
Mandarin	55
Persian	3
Romanian	1
Russian	1
Spanish	2
Tagalog	1
Vietnamese	183
Total	277

### **Summary – Number of LEP Likely to be Served**

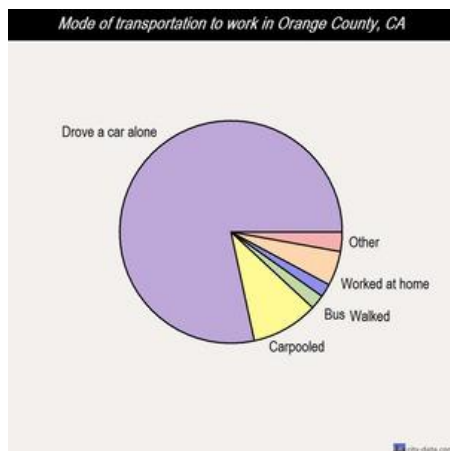
- As of 2016 American Community Survey, the overall population of Orange County has declined.
- With the population reduction, Vietnamese no longer meets both the number and percentage criteria for the Safe Harbor provision.
- The number and percentage of Public school Arabic, Tagalog, Korean, Chinese, Spanish, and Vietnamese language learners have declined in Orange County over a five-year period.
- The County of Orange has identified vital document translation in Arabic, Farsi, Korean, Spanish, and Vietnamese for the County's Medi-Cal mental health services.
- The language with the highest request for verbal translation services for OCTA was Vietnamese.

- The sixteen languages do not meet the 5% of the population but are identified as the 1,000 LEP speakers that meet the Safe Harbor threshold in Orange County.
- The sixteen languages that meet the 1,000 speaker Safe Harbor provision in Orange County are Arabic, Chinese, Farsi, French, German, Gujarati, Hindi, Ilocano, Japanese, Korean, Khmer, Punjabi, Russian, Thai, Tagalog, and Vietnamese.

**FACTOR TWO** - The frequency with which LEP individuals come in contact with the program, service, or activity.

Chart 1 represents approximately 1.7% of the population in Orange County who travels by means of public transportation bus for work.

Means of transportation to work:



- **Drove a car alone:** 1,307,611 (78.7%)
- **Carpooled:** 167,072 (10.1%)
- **Bus or trolley bus:** 28,788 (1.7%)
- **Streetcar or trolley car:** 160 (0.0%)
- **Subway or elevated:** 215 (0.0%)
- **Railroad:** 3,886 (0.2%)
- **Ferryboat:** 177 (0.0%)
- **Taxicab, motorcycle, or other means:** 19,943 (1.2%)
- **Bicycle:** 11,510 (0.7%)
- **Walked:** 26,417 (1.6%)
- **Worked at home:** 95,142 (5.7%)

Read more: [http://www.city-data.com/county/Orange\\_County-CA.html#ixzz5HkzpU9Xm](http://www.city-data.com/county/Orange_County-CA.html#ixzz5HkzpU9Xm)

Appendix 1 is a cross reference of 2010 U.S. Census information and 2017 City-Data that identifies by zip code the number and percentage of LEP individuals who speak English “less than very well” for Spanish, Indo-European, and Asian/Pacific Islander languages who use public busses as a means of transportation to work. Approximately 76,653 individuals take the bus to work as means of transportation. Of those individuals, approximately 36,549 or 47.7% identify as individuals who speak English “less than very well”. The language percentages of potential LEP passengers utilizing bus for means of transportation to work is approximately 17% for Spanish, 9% for Indo-European, and 21% for Asian/Pacific Islander languages.

### **2014 Customer Satisfaction Survey Results**

The 2014 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. 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 dominant reasons why respondents indicated they ride OCTA's fixed-route bus service instead of another means of transportation centered on their inability to use a personal vehicle (car), either because it is too expensive to purchase and/or maintain a car (45%), they do not have a license/can't drive (19%), or their current vehicle is not working properly (9%). Cost was also a factor for some, with 9% stating they save money by riding the bus and an additional 5% citing high gas prices as the main reason why they choose to ride the bus.

Table 5 represents the percentage of respondents by income and ethnicity who use OCTA busses instead of other means of transportation.

**Table 5: Income/Ethnicity of Survey Respondents General Purpose Bus Usage**

	Household Income (QD1 2)						Ethnicity (QD9)					
	Less than \$10K	\$10K to \$19K	\$20K to \$29K	\$30K to \$49K	\$50K to \$64K	\$65K or more	Cauc / White	Latino / Hispanic	Af Amer / Black	Amer Indian	Asian American	Other / Mixed
Can't afford to purchase, maintain a car	56%	46%	39%	32%	27%	26%	45%	46%	37%	34%	43%	33%
No driver's license, can't drive	18%	16%	24%	21%	18%	20%	18%	21%	15%	14%	21%	14%
I save money by riding the bus	5%	10%	7%	14%	20%	17%	9%	8%	11%	18%	12%	13%
My car isn't working properly	6%	9%	9%	13%	7%	9%	8%	7%	17%	6%	5%	14%
Prefer not to drive	3%	4%	5%	7%	7%	6%	5%	5%	4%	4%	4%	6%
High gas prices	3%	5%	8%	5%	9%	4%	5%	4%	7%	7%	4%	4%
Other reason	5%	4%	3%	3%	4%	7%	4%	4%	4%	6%	3%	7%
Enjoy riding the bus	3%	2%	2%	2%	3%	3%	2%	3%	3%	0%	3%	1%
Better for environment, air quality	1%	2%	1%	2%	3%	5%	2%	1%	1%	3%	3%	3%
Avoid traffic congestion	1%	1%	1%	1%	1%	2%	1%	1%	0%	2%	1%	5%
Better use of time	0%	1%	1%	0%	1%	1%	1%	0%	0%	5%	1%	0%

2014 Fixed-Route Bus Service Customer Satisfaction Survey – True North Research

## **Summary**

- Approximately 2% of Orange County population uses a public transportation bus by means to transportation to work.
- Approximately 76,653 individuals take the bus to work as means of transportation and of those individuals, approximately 36,549 or 47.7% identify as individuals who speak English “less than very well” who have the potential to come in contact with OCTA fixed-route services.
- Of the approximate 47.7% potential LEP passengers utilizing bus for means of transportation to work, approximately 17% speak Spanish, 9% speak an Indo-European, language, and 21% speak an Asian/Pacific Islander language.
- The majority of survey respondents were identified as passengers who ride fixed-route buses from four (4) to seven (7) days a week for at least the last four (4) years.
- Approximately 73% of survey respondents stated the primary reason for utilizing public transportation was an inability to maintain a vehicle due to cost, licensing, or maintenance.
- Survey respondents by income and ethnicity indicated the best media resource for receiving fixed-route information was the OCTA Bus Book.

## **FACTOR THREE**

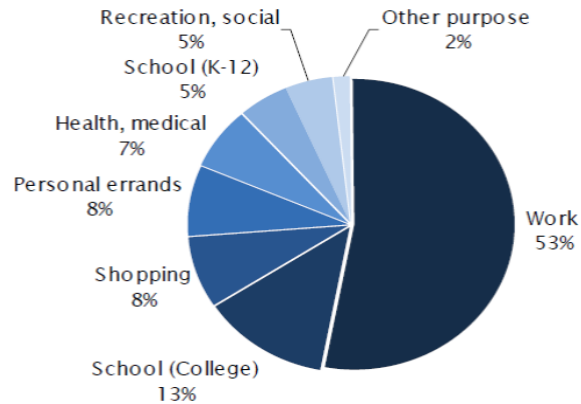
**Factor 3:** The nature or importance of OCTA services, programs, or activities provided to LEP individuals.

OCTA is the premier fixed-route bus system of Orange County, which operates 77 routes throughout the County. OCTA's fixed-route bus system is an integral part of the regional transportation system. OCTA delivers efficient transportation programs that reduce traffic congestion and improve mobility. As the premier provider of urban public transportation in the County of Orange, OCTA also provides an important paratransit programs, bus service between Metrolink stations, and connecting routes to Los Angeles, Riverside, and San Diego transit agencies.



## 2014 Customer Satisfaction Survey Results

The 2014 Customer Satisfaction Survey results indicated that more than half (53%) of riders who were taking the bus at the time he/she was being interviewed was work-related. Other purposes included going to college (13%), shopping (8%), running personal errands (8%), traveling to/from a health or medical appointment (7%), going to school (5%), attending a recreation/social event (5%), and other purposes (2%).



### Summary

- As the premier provider of public transportation in Orange County, members of the public rely on the fixed-route bus services as a means of transportation to work.
- Approximately 18% of the public use fixed-route bus services by means to transportation for primary and secondary educational services.

### FACTOR FOUR

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

According to the 2014 Customer Satisfaction Survey, approximately 79% of the passengers surveyed prefer to receive fixed-route bus information in English. The second highest language was Spanish at 18%.

Table 6 identifies by the language riders prefer to receive fixed-route bus information in.

**Table 6: Language Preferred to Receive Bus Information**

In what language would you prefer to receive bus information? <i>Check one.</i>		
1	English	79%
2	Spanish	18%
3	Vietnamese	1%
4	Chinese/Mandarin/Cantonese	1%
5	Korean	<1%
6	Tagalog	<1%
7	Farsi	<1%

The 2014 Customer Satisfaction Survey rated the OCTA Bus Book as the most effective source for information about OCTA bus service (68% very or somewhat effective), followed by Text4Next (56%), information at bus stops (56%), eBusbook from OCTA’s website (56%), the Telephone Customer Information Center (52%), OCTA mobile website (51%), and the Trip Planner on OCTA’s website (51%).

Table 7 identifies by ethnicity the effectiveness for each source of fixed-route information.

**Table 7: Percentage Effectiveness of Information Sources by Ethnicity**

	Ethnicity (QD9)					
	Caucasian / White	Latino / Hispanic	Af Amer / Black	Amer Indian	Asian American	Other / Mixed
Printed Bus Books	50%	53%	54%	47%	43%	51%
Text4Next	35%	47%	42%	42%	28%	44%
eBusbook from OCTA’s website	33%	39%	43%	33%	34%	46%
Information at Bus Stops	31%	41%	35%	32%	31%	40%
OCTA mobile site	30%	38%	33%	27%	30%	38%
Telephone Customer Information Center	33%	36%	39%	25%	22%	41%
Trip Planner from OCTA’s website	32%	35%	34%	34%	26%	33%
Google Transit website	28%	34%	33%	35%	30%	42%
Advertising inside buses	21%	32%	28%	30%	17%	33%
On-bus Rider Alert flyers	21%	31%	26%	27%	19%	27%
Email/Rider Alerts	21%	30%	25%	25%	17%	23%
Special Promotional Service Brochure on bus	20%	30%	26%	29%	15%	30%
Advertising on outside of bus	21%	28%	25%	33%	17%	32%
Social Media - Facebook and/or Twitter	18%	28%	23%	26%	15%	26%
511 (phone)	18%	26%	21%	25%	13%	29%
Go511.com website	17%	23%	19%	23%	12%	28%

2014 Fixed-Route Bus Service Customer Satisfaction Survey – True North Research

### Summary

- Approximately 80 percent of survey respondents prefer to receive fixed-route bus information in English.
- The OCTA Bus Book is considered the most effective resource for fixed-route information for six identified ethnic groups.

### Conclusion

- As of 2016 American Community Survey, the overall population of Orange County has declined and as such Vietnamese no longer meets both the number and percentage criteria for the Safe Harbor provision.
- Approximately 2% of Orange County population uses a public transportation bus by means to transportation to work.
- OCTA passengers also use the fixed-route bus service by means of transportation to public school or secondary education, errands, and doctor’s appointments.
- Approximately 76,653 individuals take the bus to work as means of transportation and of those individuals, approximately 36,549 or 47.7% identify as individuals who speak English “less than very well” who have the potential to come in contact with OCTA fixed-route services.
- Customer Satisfaction Survey respondents indicated the preferred language to receive information is English.
- With the projected reduction in population, Vietnamese does not meet the 5% Safe Harbor threshold but continues to have at least 1,000 speakers.
- Vital documents provided by the County of Orange Medi-Cal Mental Health services translates its vital documents into four languages which are reflective of the four most language translation requests OCTA has received in the last three years.

## **Available Resources**

OCTA has allocated \$25,000.00 in the FY 2018-2019 Budget for translation services. OCTA's External Affairs Division utilizes the allocation to ensure that OCTA information is available in Spanish regarding services, programs, and activities including surveys, bus routes and fares, and other informational media in the Bus Book and on the buses, as well as in the Administrative Office buildings and OCTA Store. Information in Vietnamese will be available for services, programs, and activities including surveys, bus routes and fares, and other informational media on the buses. Information for major service and fare changes, as well as public hearings, information will be available in Chinese, Farsi, Korean, Spanish, and Vietnamese. Due to the low volume of translations requests over the three-year period, other language translations will be upon request.

In June 2018, the External Affairs Division updated the OCTA website with the capability for translating website information into 15 out of the 16 languages that meet the Safe Harbor provision: Arabic, Chinese, Farsi, French, German, Gujarati, Hindi, Japanese, Khmer, Korean, Punjabi, Thai, Tagalog, Russian, and Vietnamese. Translation for Hawaiian languages is not available at this time.

OCTA will utilize its Employee Language Translator Volunteer data-base for additional language translation services upon request. Employee translators are available in all of the identified Safe Harbor languages except for French, German, Japanese, and Russian. There have been no requests for language translation for French, German, and Japanese within the last three years. Requests for Russian translation services can be provided through the Customer Relations Department provided by AT&T.

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 two (2) representatives who speak 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 vital written communications that are printed in both English, Spanish and Vietnamese for Title VI: Title VI Protection Notification, Title VI Complaint Procedure and Form. Marketing materials for major service and fare changes and Public Hearing Notices will be available in English, Spanish, and Vietnamese and depending on the affected area in Chinese, Farsi, and Korean. ADA vital written documents such as intake, denials, and grievances, complaint procedure and form are available in English and Spanish.

Due to the low number of requests for language translation services during the triennial period, in addition to no requests for vital written translation for Title VI or ADA documents for any of the of the Safe Harbor languages, or for non-vital documents, all requests for language/translation assistance will be served utilizing resources previously identified upon request.

## **Language Assistance Implementation Plan:**

Based on the four factor analysis, OCTA has identified the Spanish as the primary language assistance needs and services required to provide meaningful access to information for the LEP residents of Orange County. OCTA will review its LEP Plan on a triennial 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 June 2018 include:

- Spanish speaking translators are available upon request during normal business hours.
- The majority of OCTA Coach Operators are bi-lingual and are able to assist members of the public in Spanish and Vietnamese.
- Non-bi-lingual Coach Operators can assist members of the public utilizing other passengers who speak another language.
- OCTA will utilize its Employee Language Translator Volunteer data-base for additional language translation services upon request.
- "I Speak" cards are available at both reception desks to assist members of the public with obtaining translation services.
- Geographic Information System (GIS) maps have been developed for five of the DOJ Safe Harbor to which OCTA has received the highest number of requests for language assistance within the last three years. (See attachments)
- \*OCTA will provide marketing materials for major service and fare changes in Chinese, Farsi, Korean, Spanish, and Vietnamese in according to effected areas per the GIS LEP language maps.
- Route and schedule in the Bus Book is available in both English and Spanish.
- Route and schedule information available for translation in 16 languages on the OCTA website.
- A supplemental language bus placard is on all vehicles in seven languages and pictographs to notify the beneficiaries of Title VI protection and the information to file a claim and/or receive additional translation services.
- The subsequent language surveys will be distributed at community outreach events and evaluated to enhance language needs at other OCTA programs.

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**

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 2015, all newly hired Coach Operators receive Title VI training on the final day of a six-week training program. 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.

Training for all other employees who have contact with LEP members of the public such as OCTA reception desks, the OCTA store, and administrative assistance will receive refresher training in 2019.

## **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 [www.octa.net](http://www.octa.net). 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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