



# Language Assistance Plan 2019



Metropolitan Transit System



SAN DIEGO METROPOLITAN TRANSIT SYSTEM

Subject: Language Assistance Plan

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SAN DIEGO METROPOLITAN  
TRANSIT SYSTEM

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## **I. Language Assistance Plan (LAP) Introduction**

The following is San Diego Metropolitan Transit System's (MTS's) LAP, developed in compliance with Title VI of the Civil Rights Act of 1964 and its implementing regulations. MTS is committed to taking all reasonable steps to ensure meaningful access by Limited English Proficient (LEP) persons. LEP persons is defined as persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. MTS's LAP identifies the prevalent languages of LEP persons using MTS services and specifies the types of language assistance measures that MTS provides.

MTS's LAP includes: results of a Four Factor Analysis including a description of the LEP populations served, how MTS provides language assistance services, how MTS provides notice to LEP persons of the availability of language assistance, how MTS trains staff to provide timely and reasonable language assistance measures, and how MTS monitors and updates its LAP.

## **II. Four Factor Analysis**

The Four Factor Analysis helps to determine the specific language services that are appropriate for MTS to provide.

### **A. Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of MTS**

#### **1. How LEP Persons interact with MTS's agency:**

To understand how LEP persons interact with MTS, it is important to understand the services MTS provides. MTS area of jurisdiction, encompassing both urban and rural areas, is approximately 3,240 total square miles. MTS serves approximately 3 million people in San Diego County.

MTS provides bus and light rail services directly or by contract with private operators. Light rail service is operated on four lines (the UC San Diego Blue Line, Orange Line, Sycuan Green Line and SDG&E Silver Line) with a total of 53 stations and 54.3 miles of rail. Almost 100 fixed bus routes and Americans with Disabilities Act (ADA) complementary paratransit service (MTS Access). Fixed route bus service includes local, urban, Rapid, express, premium express and rural routes. MTS generates 88 million annual passenger trips or 300,000 trips each weekday. To handle the demand, the agency schedules 7,000 trips each weekday, and has 128 trolley cars and 800 buses in its fleet.

MTS coordinates all its services and determines the routing, stops, frequencies and hours of operation. MTS is responsible for the service planning, scheduling, and performance monitoring of all MTS transit services. Service adjustments occur three times per year and as needed to improve efficiency and customer service.

MTS is governed by a 15 member Board of Directors. Members are selected as follows: 4 appointed from the City of San Diego (the Mayor of San Diego and 3 San Diego City Council members); 2 appointed

from the City of Chula Vista (the Mayor of Chula Vista and a Chula Vista City Council Member); 1 appointed from city council of Coronado; 1 appointed from city council of El Cajon; 1 appointed from city council of Imperial Beach; 1 appointed from city council of La Mesa; 1 appointed from city council of Lemon Grove; 1 appointed from city council of National City; 1 appointed from city council of Poway; 1 appointed from city council of Santee; and 1 appointed from the San Diego County Board of Supervisors. The MTS Board of Directors generally meets once a month at MTS's main administrative office at 1255 Imperial Avenue, Suite 1000, San Diego CA 92101. MTS Board of Directors meetings, along with other Committee meetings, are public meetings available for the public to attend and participate through public comment.

2. Identification of LEP communities, and assessing the number or proportion of LEP persons from each language group

Information on the LEP communities and number of LEP persons from each language assists MTS in determining the appropriate language services for each language group, as further discussed in this LAP.

The following Table 1<sup>1</sup> identifies LEP communities and the number of LEP persons from each language group. Specifically, Table 1 shows languages other than English with at least a thousand speakers or five percent of the MTS service area population, spoken by people age 5 and older in MTS's service area<sup>2</sup>.

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<sup>1</sup> San Diego Association of Governments (SANDAG), the metropolitan planning organization for the San Diego region, used their Geographic Information Systems (GIS) team to assist MTS in compiling data for Factor 1 of the Four Factor Analysis.

<sup>2</sup> Threshold used for identifying languages spoken is consistent with the Safe Harbor Threshold, prescribed by Title VI regulations and other supplementing guidance from the FTA.

**Table 1: LEP Speakers by Language in MTS's Jurisdiction**

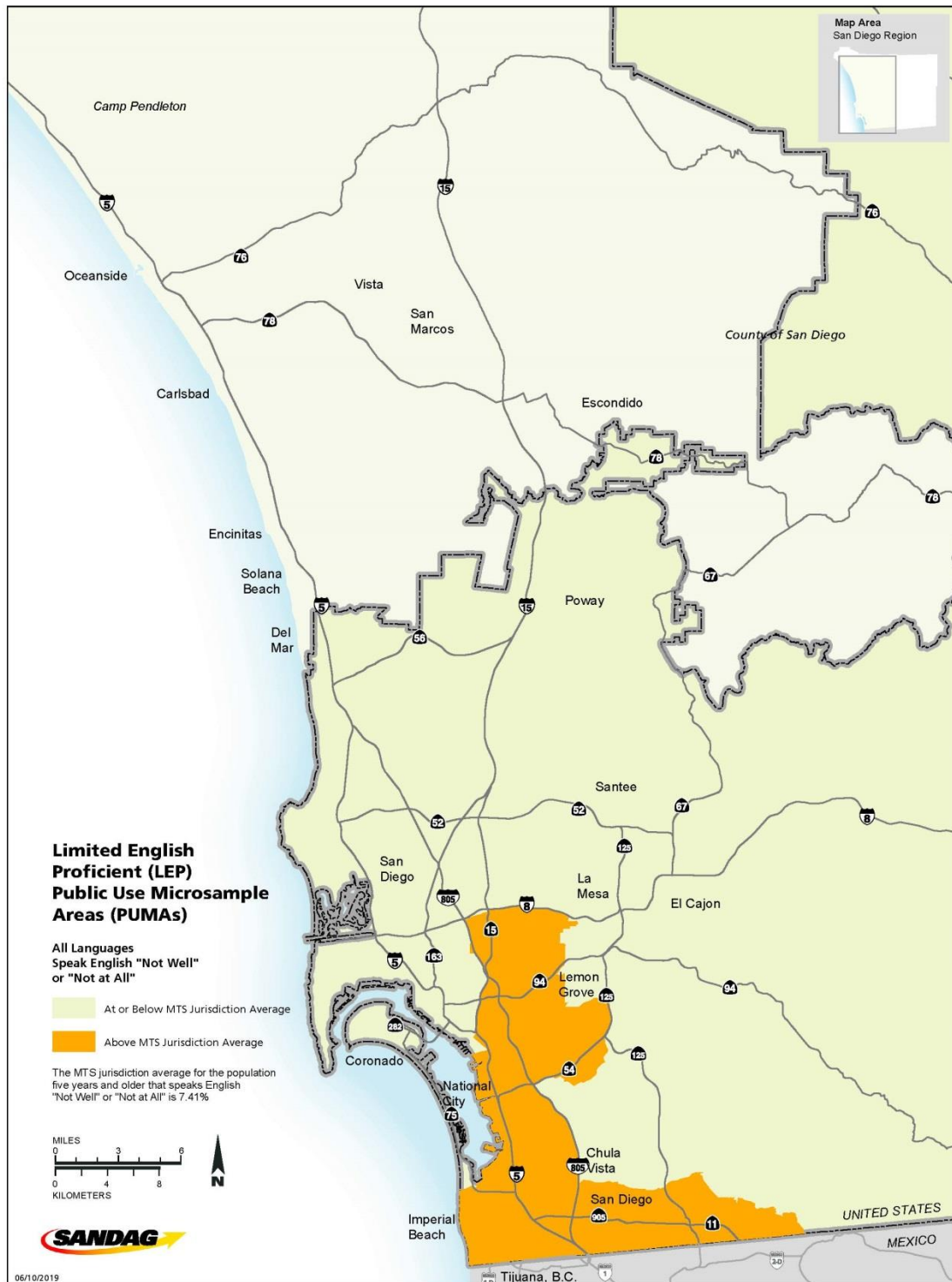
<b>LEP Speakers by Language in MTS's Jurisdiction<sup>3</sup></b>			
<b>Language*</b>	<b>LEP MTS Population</b>	<b>Percent of All LEP Speakers in MTS Jurisdiction</b>	<b>Percent of Total MTS Population Age 5 and Older</b>
Spanish	114,295	68.54%	5.08%
Vietnamese	12,276	7.36%	0.55%
Tagalog	6,303	3.78%	0.28%
Arabic	5,091	3.05%	0.23%
Chinese	4,633	2.78%	0.21%
Korean	2,855	1.71%	0.13%
Chaldean Neo-Aramaic	1,989	1.19%	0.09%
Russian	1,695	1.02%	0.08%
Filipino	1,675	1.00%	0.07%
Assyrian Neo-Aramaic	1,591	0.95%	0.07%
Mandarin	1,504	0.90%	0.07%
Lao	1,347	0.81%	0.06%
Farsi	1,301	0.78%	0.06%
Japanese	1,181	0.71%	0.05%
Cantonese	1,024	0.61%	0.05%

The MTS jurisdiction average for people age 5 and older that speak English “Not Well” or “Not at All” is 7.41%. Figure 1 map identifies areas with LEP speakers who speak English “Not Well” or “Not at all” that are below and above the MTS jurisdiction average.

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<sup>3</sup> Source: U.S. Census Bureau, American Community Survey (ACS) 5-Year Public Use Microdata Sample (PUMS) 2013-2017. \*Restricted to languages spoken by at least 1,000 limited English proficient speakers. Note: The U.S. Census Bureau discontinued the ACS 3-Year PUMS data used in the 2013 LAP, therefore, 5-Year Estimates data are used for the 2019 report. Due to this change in data availability, any comparison to previous reports should be done with caution.

Figure 1: LEP Speakers that Speak English “Not Well” or “Not at all”



3. The literary skills of LEP populations in their native languages, in order to determine whether translation of documents will be an effective practice; and

No data<sup>4</sup> was available regarding the literary skills of LEP populations. However, as discussed further in Section III of this LAP, MTS provides both oral translation and document translation regarding MTS's services as applicable and upon request.

4. Whether LEP persons are underserved due to language barriers

No data<sup>5</sup> was available regarding whether LEP persons are underserved due to language barriers. However, as discussed further in Section II (B) of this LAP, MTS does maintain data and/or general observations from staff regarding the frequency with which LEP persons come into contact with MTS's services.

**B. Factor 2: The frequency with which LEP individuals come in contact with a program, activity or service of MTS**

MTS surveyed key program areas and assessed major points of contact with the public, such as fixed route bus service, complementary paratransit service, trolley service, security, ticket purchases, public meetings, interactions with customer service, and website use.

1. Fixed Route Bus Service

LEP individuals may come into contact with MTS fixed route bus service, as MTS bus operators have continual interactions with passengers as they are boarding, in transit, and deboarding. MTS administered a survey regarding the frequency in which LEP persons come into contact with bus operators whom operate various routes within MTS's service area<sup>6</sup>. The survey has been broken out by operating divisions.

Table 2 shows the results from bus operators that operate routes from Imperial Avenue Division (IAD) and Kearny Mesa Division (KMD). IAD and KMD operate service primarily within the urbanized area of the City of San Diego. Out of a total of 540 operators that operate from IAD and KMD, 97 bus operators participated in the survey.

Table 3 shows the results from bus operators that operate routes from South Division (SBD). SBD operates service through the South Bay cities and communities, as well as some City of San Diego communities in its urbane core as far north as Old Town. Out of a total of 400 bus operators that operate from SBD, 154 participated in the survey.

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<sup>4</sup> ACS, the source used to identify LEP populations in MTS's service area, does not maintain data on the literary skills of LEP populations in their native languages. SANDAG and MTS are unaware of any other data source that quantifies the literary skills of LEP populations in their native languages.

<sup>5</sup> SANDAG and MTS are unaware of a data source that quantifies whether LEP people in MTS's service area are underserved based on language barriers.

<sup>6</sup> An anonymous survey was administered to bus operators in September 2019. For purposes of this LAP, staff used their best efforts to group similar worded responses into categories of frequency.



Table 4 shows the results from bus operators that operate routes from East County Division (ECD). ECD operates service in the East County cities and rural communities, routes in the northern half of the City of San Diego, and freeway express services along the I-15 corridor. Out of a total of 120 bus operators that operate from ECD, 55 participated in the survey.

**Table 2: Frequency of Contacts with LEP Riders – IAD and KMD Bus Operators**

Frequency of Contacts with LEP Riders – IAD and KMD Bus Operators																				
Language	LEP Population in Service Area		Number of Operators (of 97 operators completing survey) reporting contact with LEP riders		Multiple Times a Day		Daily		Multiple Times a Week		Multiple times in a Month		Monthly		Multiple Times a Year		Rarely		Unknown Frequency	
Spanish	114295	68.54%	89	92%	5	6%	13	15%	21	24%	14	16%	12	13%	13	15%	6	7%	5	6%
Chinese	4633	2.78%	20	21%							4	20%	2	10%	3	15%	3	15%	8	40%
Unknown Language			17	18%			2	12%			1	6%			1	6%	3	18%	10	59%
Japanese	1181	0.71%	12	12%							1	8%					5	42%	6	50%
Tagalog	6303	3.78%	11	11%			1	9%			2	18%	1	9%	1	9%	3	27%	3	27%
Vietnamese	12276	7.36%	11	11%							2	18%					6	55%	3	27%
French			10	10%							1	10%	1	10%			5	50%	3	30%
Russian	1695	1.02%	8	8%									2	25%			3	38%	3	38%
Arabic	5091	3.05%	6	6%											1	17%	2	33%	3	50%
Korean	2855	1.71%	5	5%							1	20%					3	60%	1	20%
Italian			5	5%									1	20%			4	80%		
German			5	5%											1	20%	1	20%	3	60%
Hindi			4	4%									1	25%			2	50%	1	25%
Mandarin	1504	0.90%	3	3%							1	33%							2	67%
Swahili			2	2%													1	50%	1	50%
Cantonese	1024	0.05%	1	1%															1	100%
Kurdish			1	1%													1	100%		
Portuguese			1	1%													1	100%		
Filipino	1675	1.00%	1	1%															1	100%
Chaldean	1989	1.19%	0	0%																
Assyrian Neo-Aramaic	1591	0.95%	0	0%																
Lao	1347	0.81%	0	0%																
Farsi	1301	0.78%	0	0%																

**Table 3: Frequency of Contacts with LEP Riders – SBD Bus Operators**

Frequency of Contacts with LEP Riders – SBD Bus Operators																				
<u>Language</u>	<u>LEP Population in Service Area</u>		<u>Number of Operators (of 154 operators completing survey) reporting contact with LEP riders</u>		<u>Multiple Times a Day</u>		<u>Daily</u>		<u>Multiple Times a Week</u>		<u>Multiple times in a Month</u>		<u>Monthly</u>		<u>Multiple Times a Year</u>		<u>Rarely</u>		<u>Unknown Frequency</u>	
Spanish	114295	68.54%	121	79%	30	25%	24	20%	25	21%	12	10%	4	3%	6	5%	9	7%	11	9%
Chinese	4633	2.78%	25	16%	2	8%	2	8%	2	8%	2	8%	1	4%	4	16%	7	28%	5	20%
Tagalog	6303	3.78%	25	16%	1	4%	2	8%			3	12%	3	12%	8	32%	5	20%	3	12%
Unknown Language			22	14%	1	5%			1	5%	2	9%			1	5%	6	27%	11	50%
Japanese	1181	0.71%	13	8%							1	8%	1	8%	3	23%	5	38%	3	23%
Arabic	5091	3.05%	10	6%							1	10%			3	30%	1	10%	5	50%
French			9	6%					1	11%	1	11%			1	11%	2	22%	4	44%
Filipino	1675	1.00%	9	6%							1	11%					4	44%	4	44%
Russian	1695	1.02%	8	5%							2	25%			1	13%	3	38%	2	25%
German			7	5%							1	14%	1	14%	1	14%	3	43%	1	14%
Italian			6	4%			1	17%									4	67%	1	17%
Portuguese			6	4%							1	17%					2	33%	3	50%
Vietnamese	12276	7.36%	5	3%			1	20%			1	20%			1	20%	1	20%	1	20%
Korean	2855	1.71%	3	2%					1	33%							1	33%	1	33%
Mandarin	1504	0.90%	2	1%							1	50%							1	50%
Bengali			1	1%							1	100%								
Malay			1	1%							1	100%								
Greek			1	1%											1	100%				
Thai			1	1%													1	100%		
Cantonese	1024	0.61%	1	1%													1	100%		
Khmer			1	1%															1	100%
Chaldean	1989	1.19%	0	0%																
Assyrian Neo-Aramaic	1591	0.95%	0	0%																
Lao	1347	0.81%	0	0%																
Farsi	1301	0.78%	0	0%																

**Table 4: Frequency of Contacts with LEP Riders – ECD Bus Operators**

Frequency of Contacts with LEP Riders – ECD Bus Operators																				
Language	LEP Population in Service Area		Number of Operators (of 55 operators completing survey) reporting contact with LEP riders		Multiple Times a Day		Daily		Multiple Times a Week		Multiple times a Month		Monthly		Multiple Times a Year		Rarely		Unknown Frequency	
Spanish	114295	68.54%	47	85%	7	15%	12	26%	8	17%	3	6%	1	2%	4	9%	8	17%	4	9%
Arabic	5091	3.05%	31	56%	5	16%	6	19%	1	3%	1	3%			5	16%	7	23%	6	19%
Chinese	4633	2.78%	15	27%	1	7%	3	20%	1	7%	1	7%			3	20%	3	20%	3	20%
Tagalog	6303	3.78%	7	13%	1	14%	1	14%			1	14%			1	14%	2	29%	1	14%
Chaldean	1989	1.19%	6	11%	2	33%	1	17%	2	33%			1	17%						
Japanese	1181	0.71%	5	9%			1	20%			1	20%			1	20%	1	20%	1	20%
Russian	1695	1.02%	5	9%											1	20%	4	80%		
Unknown Language			4	7%	1	25%									1	25%	1	25%	1	25%
German			4	7%							1	25%			1	25%	1	25%	1	25%
Hindi			3	5%			3	100%												
Korean	2855	1.71%	3	5%											1	33%			2	67%
Portuguese			2	4%			1	50%									1	50%		
Kurdish			2	4%					1	50%									1	50%
French			2	4%							1	50%			1	50%				
Cantonese	1024	0.61%	1	2%			1	100%												
Filipino	1675	1.00%	1	2%					1	100%										
Vietnamese	12276	7.36%	1	2%													1	100%		
Norwegian			1	2%											1	100%				
Polish			1	2%															1	100%
Farsi	1301	0.78%	1	2%													1	100%		
Greek			1	2%															1	100%
Assyrian Neo-Aramaic	1591	0.95%	0	0%																
Mandarin	1504	0.90%	0	0%																
Lao	1347	0.81%	0	0%																

## 2. Complementary Paratransit Service

LEP individuals may come into contact with MTS's Complementary Paratransit Service (MTS Access) during the application process, trip reservation process or while on the bus. MTS Access provides service to individuals with disabilities who cannot use fixed route service or trolley service because of their disability.

### a. Eligibility Process for MTS Access

#### i. Application

MTS Access certification applications are provided in English and Spanish. Applicants can also submit an application online, which the website can be translated into any language available on Google Translation Widget. Whichever language the application is completed in, any correspondence back to the applicant will be provided in that language using in house bilingual staff to translate and proofread correspondence. If applicants have any questions, there is a language assistance phone line.

No data is maintained on how frequent LEP passengers come into contact with MTS Access through the application process. However, the following general observations were provided: In the past year, the only language the application has been received in, other than English, has been in Spanish; About 260 Spanish applications have been received out of a total of 2,060 applications received (i.e. about 10% in Spanish); The language assistance phone line has been used only a few times in the last year when a passenger does not speak English or Spanish.

#### ii. In-person Assessments

After the application is completed, in-person assessments are conducted with the applicant. No data is maintained on how frequent LEP passengers come into contact with MTS Access through the in-person assessment process however the following general observations were provided: Staff that speak English and Spanish are available and have spoken Spanish to interviewees about 200 times out of a total of 2,027 interviews (i.e. about 10% of interviews in Spanish); Staff has not received any requests to provide a translator at an in-person interview; and About 30 times out of a total of 2,027 interviews (i.e. 1% of interviews), applicants have brought companions or personal care attendants to the in-person assessment who have translated for the applicant in the following languages: Arabic, Tagalog, Korean, Mandarin, Vietnamese, Somali, and Swahili.

#### iii. Appeals

If an application for MTS Access certification is denied, the applicant can appeal to the MTS Access Appeals Board. Whichever language the appeal is completed in, any correspondence back to the applicant will be provided in that language. No data is maintained on how frequent LEP passengers come into contact with MTS Access through the interview process however the following general observations were provided: In the past year, correspondence regarding appeals has been sent in only

English or Spanish; and in 2018 there were 2 requests for Spanish translation services at MTS Access Appeals Board Hearings out of a total of 71 Hearings.

b. Reservations for MTS Access

Eligible passengers may contact MTS Access to make advance reservations for trips. No data is maintained on how frequent LEP passengers come into contact with MTS Access through the reservation process however the following general observations were provided: All reservation staff are bilingual in English and Spanish; In the past year, almost all reservations were made in either English (334,000 calls or 95%) or Spanish (16,000 calls or 5%); and Fewer than 1% of calls were made in other languages (about 4 calls in Tagalog and about 2 calls in Vietnamese).

c. Operations for MTS Access

LEP individuals may come into contact through MTS Access service, as MTS bus operators have continual interactions with passengers as they are boarding, in transit, and deboarding. MTS administered a survey regarding the frequency in which LEP persons come into contact with MTS Access bus operators<sup>7</sup>. MTS Access provides trips to origins and destinations within three-fourths of a mile on each side of each fixed route.

Table 5 shows the survey results from MTS Access bus operators<sup>8</sup>. MTS Access Out of a total of 164 MTS Access bus operators, 93 bus operators participated in the survey. Out of a total of 164 MTS Access operators, 65 are bilingual in English and Spanish.

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<sup>7</sup> An anonymous survey was administered to bus operators in September 2019. For purposes of this LAP, staff used their best efforts to group similar worded responses into categories of frequency.

<sup>8</sup> About 10% of the responses may have been completed by operators who do not drive for MTS Access. First Transit, a MTS third party contractor, operates MTS Access and some fixed bus routes that use mini-buses. Mini buses are operated out of the Copley Park Division, which service routes throughout MTS's service area. Since the survey was administered to all First Transit operators and completed anonymously, there may be about 10% of the responses from bus operators that operate fixed route mini-buses, and not MTS Access.

**Table 5: Frequency of Contacts with LEP Riders – MTS Access Bus Operators**

Frequency of Contacts with LEP riders – MTS Access Bus Operators																				
<u>Language</u>	<u>LEP Population in Service Area</u>		<u>Number of Operators (of 93 operators completing survey) reporting contact with LEP riders</u>		<u>Multiple Times a Day</u>		<u>Daily</u>		<u>Multiple Times in a Week</u>		<u>Multiple times in a Month</u>		<u>Monthly</u>		<u>Multiple Times a Year</u>		<u>Rarely</u>		<u>Unknown Frequency</u>	
Spanish	114295	68.54%	80	86%	8	10%	11	14%	20	25%	16	20%	5	6%	7	9%	5	6%	8	10%
Tagalog	6303	3.78%	30	32%			4	13%	2	7%	4	13%	1	3%	4	13%	3	10%	12	40%
Russian	1695	1.02%	22	24%			2	9%			3	14%	1	5%	1	5%	4	18%	11	50%
Chinese	4633	2.78%	21	23%			1	5%	1	5%	4	19%	1	5%	3	14%	3	14%	8	38%
Unknown Language			18	19%			1	6%	1	6%	1	6%			4	22%	4	22%	7	39%
Arabic	5091	3.05%	11	12%	1	9%					1	9%	1	9%	2	18%	3	27%	3	27%
Vietnamese	12276	7.36%	7	8%							2	29%					2	29%	3	43%
Korean	2855	1.71%	6	6%							1	17%					2	33%	3	50%
Japanese	1181	0.71%	6	6%													1	17%	5	83%
Mandarin	1504	0.90%	5	5%	1	20%					1	20%			1	20%	1	20%	1	20%
Filipino	1675	0.07%	5	5%									1	20%	1	20%	1	20%	2	40%
German			4	4%							1	25%					1	25%	2	50%
French			4	4%									1	25%	1	25%			2	50%
Hindi			3	3%													2	67%	1	33%
Italian			1	1%									1	100%						
Haitian			1	1%															1	100%
Dutch			1	1%													1	100%		
Serbian			1	1%															1	100%
Cantonese	1024	0.05%	1	1%													1	100%		
Indonesian			1	1%															1	100%
Hebrew			1	1%											1	100%				
Somali			1	1%											1	100%				
Sudanese			1	1%															1	100%
Chaldean	1989	1.19%	1	1%													1	100%		
Assyrian Neo-Aramaic	1591	0.95%	0	0%																
Lao	1347	0.81%	0	0%																
Farsi	1301	0.78%	0	0%																

### 3. Trolley Service

LEP individuals may come into contact with trolley service, as trolley operators have interactions with passengers as they are entering and exiting the trolley and in route as necessary. The following general observations were provided regarding trolley operators: Trolley operators speak with LEP persons speaking Spanish most frequently on the Blue Line generally and the San Ysidro Trolley Station specifically; out of 142 trolley operators employed, 28 speak Spanish, 1 speaks Mandarin, and 1 speaks Vietnamese<sup>9</sup>.

In addition, MTS administered a survey regarding the frequency in which LEP persons come into contact with trolley operators whom operate various routes within MTS's service area<sup>10</sup>. Out of a total of 142 trolley operators, 52 trolley operators participated in the survey.

Table 6 shows the results from trolley operators that operate routes throughout MTS's service area.

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<sup>9</sup> General observations provided by MTS Superintendent of Trolley in September 2019.

<sup>10</sup> An anonymous survey was administered to trolley operators in November 2019. For purposes of this LAP, staff used their best efforts to group similar worded responses into categories of frequencies.



**Table 6: Frequency of Contacts with LEP Riders – Trolley Operators**

Frequency of contacts with LEP riders – Trolley Operators																				
Language	LEP Population in Service Area		Number of Trolley Operators (of 52 operators completing survey) reporting contact with LEP riders		Multiple Times a Day		Daily		Multiple Times in a Week		Multiple times in a Month		Monthly		Multiple Times a Year		Rarely		Unknown Frequency	
Spanish	114295	68.54%	47	90%	3	6%	5	11%	9	19%	2	4%	16	34%	5	11%	3	6%	4	9%
French			7	13%					1	14%							3	43%	3	43%
Chinese	4633	2.78%	4	8%					1	25%							3	75%		
Russian	1695	1.02%	4	8%													3	75%	1	25%
Italian			3	6%									1	33%			1	33%	1	33%
Japanese	1181	0.71%	3	6%											1	33%	1	33%	1	33%
Portuguese			3	6%													2	67%	1	33%
Vietnamese	12276	7.36%	2	4%													2	100%		
Arabic	5091	3.05%	2	4%													1	50%	1	50%
German			2	4%													1	50%	1	50%
Unknown Language			1	2%											1	100%				
Korean	2855	1.71%	1	2%															1	100%
Tagalog	6303	3.78%	0	0%																
Chaldean	1989	1.19%	0	0%																
Filipino	1675	0.07%	0	0%																
Assyrian Neo-Aramaic	1591	0.95%	0	0%																
Mandarin	1504	0.90%	0	0%																
Lao	1347	0.81%	0	0%																
Farsi	1301	0.78%	0	0%																
Cantonese	1024	0.05%	0	0%																

#### 4. Security

MTS Security staff, which includes Code Compliance Inspectors (CCI) and Transit System Security (TSS) Officers, performs fare checks and proof of eligibility for reduced fare passes on board trolley vehicles, on buses and at trolley stations, in addition to other safety related responsibilities. No data is maintained regarding the frequency in which LEP persons come into contact with MTS security staff however the following general observations were provided: Almost half of CCI (22 of 50) are bilingual in English and Spanish; over half of TSS Officers (77 of 140) are bilingual in English and Spanish; a few CCI and TSS officers are bilingual in English another language besides Spanish (e.g. Tagalog, Chinese); On the Blue Line about 70% of passenger contacts are spoken in Spanish; in the downtown San Diego area about 35% of passenger contacts are spoken in Spanish; on the Green Line about 15% of passenger contacts are spoken in Spanish; and on the Orange Line about 30% of passenger contacts are spoken in Spanish<sup>11</sup>.

#### 5. Purchase of passes and tickets through vending machines, outlets, websites, and over the phone<sup>12</sup>

Passengers can purchase passes and tickets through the following methods: ticket vending machines (TVMs), bus farebox, participating retail outlets, through other agencies or organizations (i.e. schools, social service agencies employers), Transit Store, mobile application, online, mail, special events. For reference, in FY18 the most fare revenue received came from: TVMs (about 39%), bus fareboxes (about 21%), and retail outlets (about 11%)<sup>13</sup>. Data is limited in terms of how many LEP passengers use each of these methods to purchase tickets and passes.

##### a. TVMs<sup>14</sup>

TVMs are located at all trolley stations and some outlets. The TVM visual and audio prompts can be displayed in either English or Spanish. If a LEP passenger has questions regarding how to use the TVM, a phone number to Central Control Security Dispatch is provided on the TVM. Some employees at the Central Control Security Dispatch are bilingual, but if additional language services are needed, the Central Control Security Dispatch can transfer the call to the appropriate department, such as MTS Customer Service or MTS Compass Card Service Center. There is no data or general observations maintained on how often LEP individuals use TVMs.

##### b. Bus Farebox<sup>15</sup>

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<sup>11</sup> General observations provided by MTS Deputy Director of Transit Enforcement in August 2019.

<sup>12</sup> MTS is in the process of procuring a new fare collection system which may provide additional opportunities for serving LEP populations. The new fare collection system is scheduled to be implemented in 2021.

<sup>13</sup> Information provided from Director of Financial Planning and Analysis in August 2019.

<sup>14</sup> As part of MTS's new fare collection system, there will be changes to TVMs. The TVM will support viewing the information in English, Spanish, Vietnamese, Tagalog, and Chinese.

<sup>15</sup> As part of MTS's new fare collection system, there will be changes to bus fareboxes. The bus farebox electronic display will use a combination of text, audio cues, as well as symbols to provide instruction and indicate if a transaction was successful or not.

Depending on the bus, MTS provide two types of fareboxes on buses. The first type has an electronic display (e.g. "Fare Due" or "Invalid Card") and the readout is provided in English. The second type has light validators (e.g. Red or Green). On both types of fareboxes, audio cues (e.g. beep tones) are used to indicate if the transaction was successful or not and visual decals providing instructions on how to use the farebox are provided in both English and Spanish.

If a LEP passenger has questions on how to use the bus farebox or general questions about how much to pay, they can ask the bus operator. Many MTS bus operators are bilingual in English and Spanish or other languages. For bus operators who are not bilingual, they are trained to point to the visual decal on the farebox or call dispatch for further assistance. There is no data and/or general observations maintained on how often LEP individuals use bus fareboxes.

c. Retail Outlets

MTS utilizes grocery stores and other businesses throughout MTS's service area as its primary third-party outlet for reduced fare and regular monthly ticket pass sales. MTS's goal is to spread out the locations of these outlets so that all communities, including communities that have LEP populations, have equal access to fare products. Most of these outlets have staff that speaks multiple languages. Several of the outlets that sell MTS products are located in communities with high proportions of LEP populations and hire staff that is fluent in the languages spoken by their customers. There is no data and/or general observations maintained on how often LEP individuals use these outlets to buy fares or passes.

d. Transit Store

The Transit Store offers for purchase MTS bus and trolley passes, MTS Access passes, and all reduced fare Compass Card with photo identification. To apply for a reduced fare, a passenger must either complete a Short Form or a Long Form, which are provided in both English and Spanish. The Short Form is processed by Transit Store personnel. The Long Form is processed by a third party contractor. All passengers must go to Transit Store to purchase their reduced fare Compass Card with photo identification once approved by appropriate staff.

There is no data maintained regarding the frequency with which LEP passengers come into contact with the Transit Store. However, the following general observations were provided by staff: Most Transit Store staff is bilingual in English and Spanish; In the past year, there have been no requests received to translate the Short Form or Long Form Reduced Fare applications into any other language besides the currently provided English and Spanish applications; Based on demand, the Transit Store prints Short Form applications mostly in English (about 90%) and in Spanish (about 10%); about 5-10 interactions a day occur with Spanish speaking passengers out of 350 interactions daily at the Transit Store; and about 5 interactions a year occur in languages other than English or Spanish at the Transit Store (e.g. Portuguese, Chinese).

e. Online - Webtix

In the last year, of 95,196 of passengers who visited MTS's online site (Webtix) to purchase Compass Card passes, the languages used to review the information included: 91.69% in English; 3.31% in Spanish; 0.59% in Chinese; 0.51% used Japanese; and 0.39% in German<sup>16</sup>.

f. Online – Estore

In addition to being able to purchase MTS Access tickets at the MTS Transit Store, MTS Access tickets can also be purchased online on the MTS Website (Estore). In the last year, of 2,016 passengers who visited Estore, the languages used to review the information were: 94.24% in English; 1.94% in Spanish; 1.14% in Chinese; 0.74% in German; 0.74% in French; and 0.40% in Italian<sup>17</sup>.

g. Phone

A Compass Card can be purchased by phone by calling the Compass Card service center. In FY19, out of a total of 59,553 calls, 56,833 or 95.4% calls were received through the English call prompts and 2,720 or 4.6% calls were received through the Spanish call prompts. No data is recorded for calls made in other languages other than English or Spanish but per general observations of MTS Compass Service Center staff, likely about 3 calls occur per year occur in other languages.

h. Mobile Application<sup>18</sup>

Through the MTS's mobile application (Compass Cloud), passengers can purchase one day and monthly passes. In the last year, of the 283,309 users that used Compass Cloud to purchase tickets, the languages used to review the information included: 91.27% in English; 3.75% in Spanish; 1.81% in Chinese; 0.41% in Korean; 0.29% in Japanese; 0.23% in German; 0.13% in Portuguese; and 0.10% in French<sup>19</sup>.

i. Mail

A Compass Card pass can also be purchased by mail order form, which is provided in English. Based on general observations from staff, in the last year no Compass Card pass has been received in any other language but English and no requests have been received to translate the form in any other languages.

6. Participation in public meetings

MTS Board of Directors and Executive Committee meetings generally occur monthly. MTS Taxicab Advisory Committee and Accessible Services Advisory Committee meeting generally occur quarterly. MTS Public Security Committee meeting and Budget Development Committee meetings meet as necessary.

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<sup>16</sup> Data provided by Google Analytics for the period of August 1, 2018 to August 1, 2019.

<sup>17</sup> Data provided by Google Analytics for the period of August 1, 2018 to August 1, 2019.

<sup>18</sup> MTS is in the process of developing a new mobile application which may provide additional opportunities for serving LEP populations, including providing an option to translate the information into Spanish.

<sup>19</sup> Data provided by Google Analytics for the period of August 1, 2018 to August 1, 2019.

No data is maintained regarding the frequency with which LEP individuals come into contact MTS during these public meetings. However, the following general observations were provided by MTS Clerks: about 3 times a year a public commenter, using either MTS staff or another member from the public, has had their comments translated from Spanish to English at a MTS Board Meeting. No translations into any other languages have been requested in the last year for any other Committee meeting.

MTS also holds other types of public meetings, such as outreach events for marketing, planning, and communications purposes. Depending on the location and type of event, MTS generally staffs these meetings and events with at least one employee who is bilingual in English and Spanish. MTS also accounts for the community and audience and provides either staff or paid translators for other languages, such as Tagalog, if required for a specific community. Additionally, MTS offers verbal interpretation services at these events for other languages upon request. Requests for interpretation into other languages besides Spanish have been rare.

#### 7. Customer service interactions

The Information and Trip Planning Call Center provides passengers information on routes, times, fares, stops and general trip planning for bus and trolley. The Customer Service Call Center assists passengers that may have complaints, compliments or general comments about MTS's service. For FY2019, Information and Trip Planning Call Center had 255,554 or 96.2% calls through the English call prompts and 10,041 or 3.8% through the Spanish call prompts. For FY2019, the Customer Service Call Center had 49,597 or 94.0% calls through the English call prompts, and 3,184 or 6.0% calls through the Spanish call prompts. There is no data maintained for calls made in other languages however, based on general observation from MTS Customer Service staff, likely about 6 calls are received in other languages in FY19.

The Office of General Counsel processes FTA Civil Rights Complaints (Title VI or ADA). In the last year, no FTA Civil Right Complaints have been received in any other language besides English<sup>20</sup>.

MTS provides two front desks at its main administrative office (1255 Imperial Avenue, San Diego) for members of the public to either call or come in person, one for general public inquiries and one for hiring and employment matters. MTS also provides a front desk at IAD (100 16th Street, San Diego) for general public inquiries. Front desk receptionists are bilingual in English and Spanish.

The following general observations were provided by the two receptionists at MTS's main administrative office: Of about 25 interactions a day with members of the public, either via the phone or in person, about one (1) of those interactions per day is with persons that speak Spanish; and the receptionists had no interactions with members of the public that spoke any languages besides English and Spanish in the past year<sup>21</sup>. The following general observations were provided by the receptionist at IAD: Out of about 78 phone calls total per day, 9 are in Spanish; Out of about 30 in person total interactions per day, 15 are in Spanish; out of about 1,577 phone calls in total last month, 154 were in Spanish; and the

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<sup>20</sup> Information provided by Staff Attorney-Regulatory Compliance in October 2019.

<sup>21</sup> Information provided by Human Resource Assistant and Human Resource Receptionist in August 2019.

receptionist had no interactions with members of the public that spoke any language beside English or Spanish in the past year<sup>22</sup>.

#### 8. Ridership Survey

The most recent MTS Customer Satisfaction Survey was conducted in 2017. It was a survey with a sample size of 3,380 and a margin of error of +/- 1.7%. It was conducted throughout the MTS service territory. The following are the results to which languages riders speak at home: 54% speak English, 39% speak Spanish, 4% speak Tagalog, 1% speak Vietnamese, and 1% speak Chinese. Of riders who speak a language other than English at home, 52% say they speak English “very well”, 27% say “well”, 17% say “not well” and 4% say “not at all”.

#### 9. Use of MTS’s Website

MTS’s website includes general information about routes, schedules, rider rules, fares, and other MTS business. In the last year, of 1,538,172 users who reviewed MTS’s Website ([www.sdmts.com](http://www.sdmts.com)), the information was viewed in the following languages: 89.92% in English, 6.14% in Spanish, 0.73% in Chinese, 0.64% in Japanese, 0.48% in German, 0.30% in French, 0.25% in Korean, 0.19% in Portuguese, 0.15% in Italian, 0.08% in Dutch, and 0.08% in Russian<sup>23</sup>.

In summary, based on the above Factor 2 analysis established through data MTS maintains and general observations received from staff, when LEP individuals do come into contact with MTS, it is predominantly with LEP individuals that speak Spanish. Reviewing the information provided from operators through the survey and information received from website and mobile application use, the next most frequented language generally appears to be Chinese. LEP passengers speaking Chinese occurs significantly less in frequency when compared to Spanish and contacts are not much more than any of the other languages that MTS staff or our services come into contact with (besides Spanish).

### **C. Factor 3: The nature and importance of the program, activity or service provided by MTS to people’s lives; and**

The provision of public transportation is a highly important service, especially for people without access to personal vehicles. According to the MTS Customer Satisfaction survey conducted in 2017, 63% of people said they had no car available for transportation. Based on feedback MTS receives from the public at community outreach meetings and at events at Transit Centers, a similarly large number of people say they and their families are dependent on transit for travel through the region<sup>24</sup>.

### **D. Factor 4: The resources available to MTS and costs.**

The resources available to MTS include in-house staff who are bilingual who may be able to interpret or translate documents and/or audit translated information for accuracy; hiring contractors to provide

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<sup>22</sup> Information provided by IAD Receptionist in November 2019.

<sup>23</sup> Data provided by Google Analytics for the period of August 1, 2018 to August 1, 2019.

<sup>24</sup> Information provided by Director of Marketing in October 2019.

interpreting services; hiring contractors to provide document translation; utilizing community volunteers to interpret information; utilizing the google translate widget on MTS website; and paying for notices in community media and newspapers that may be provided in various languages as necessary for outreach and marketing needs.

### **III. Language Assistance Measures**

#### **A. Vital Documents**

##### **1. List of Vital Documents**

MTS identified the following vital documents required for riders to access its service:

- i. Rider's Guide "how to ride" brochure;
- ii. Take Ones, explaining upcoming service changes;
- iii. Notice of MTS's Title VI obligations, including complaint information and forms;
- iv. Notices of availability of language translation assistances and interpretation service;
- v. Application for Reduced Fare Compass Card for seniors, individuals with disabilities, individuals with Medi-Care card and youth; and
- vi. Application for Complementary Paratransit.

##### **2. Translation of Vital Documents**

To determine which languages MTS's vital documents should be translated into depends on which LEP populations meet the Safe Harbor Provision and the results of the Four Factor Analysis.

##### **i. Safe Harbor Provision**

The Safe Harbor Provision states that transit agencies should review whether it would be effective to translate vital written documents into the primary language for each LEP group that has the presence of LEP speakers at 5% of the total service area population or 1,000 individuals, whichever measure is less.

As discussed in Factor 1, the following 15 languages meet the Safe Harbor threshold: Spanish, Vietnamese, Tagalog, Arabic, Chinese, Korean, Chaldean Neo-Aramaic, Russian, Filipino, Assyrian Neo-Aramaic, Mandarin, Lao, Farsi, Japanese, and Cantonese.

##### **a. Spanish Translation**

Per Factor 1, Spanish is the predominate language spoken by LEP in the MTS service area, at 5.08% of the population. In reviewing the frequency with which LEP populations come in contact with MTS services, as identified in Factor 2, Spanish-speaking LEP persons utilize MTS services and contact our system with sufficient frequency to warrant making all vital documents readily available in both English and Spanish.

- b. Vietnamese, Tagalog, Arabic, Chinese, Korean, Chaldean Neo-Aramaic, Russian, Filipino, Assyrian Neo-Aramaic, Mandarin, Lao, Farsi, Japanese, and Cantonese Translation

Based on the Factor 1 analysis, Vietnamese, Tagalog, Arabic, Chinese, Korean, Chaldean Neo-Aramaic, Russian, Filipino, Assyrian Neo-Aramaic, Mandarin, Lao, Farsi, Japanese, and Cantonese met the Safe Harbor threshold with over 1,000 speakers, but combined only represent 1.98% of the MTS service area population. Of these languages, the 2 largest groups speak Vietnamese, representing .55%, and Tagalog, representing .28% of the MTS service area population.

When reviewing Factor 2 analysis, the languages that are most frequented vary depending on the source. Google Analytics data for MTS's website and mobile phone application found that predominantly Spanish was used (90% and higher), and the next most used languages, albeit with significantly less frequency was Chinese (range of 0.59% to 1.81% depending on the source). There is no clear top third language used to view MTS's website or mobile phone applications (may be Japanese, Korean or German depending on the source).

Survey results from operators found that most interactions occur in Spanish, and the next most frequented languages, although significantly less than Spanish, were: Chinese (21% of IAD and KMD bus operators, 16% of SBMF bus operators, 27% of ECBMF bus operators, 23% of MTS Access bus operators, 8% of trolley operators); Tagalog (11% of IAD and KMD bus operators, 16% of SBMF bus operators, 13% of ECBMF bus operators, 32% of MTS Access bus operators, 0% of trolley operators); Japanese (12% of IAD and KMD bus operators, 8% of SBMF bus operators, 9% of ECBMF bus operators, 6% of MTS Access bus operators and 6% of trolley operators); and Arabic (6% of IAD and KMD bus operators, 6% of SBMF bus operators, 56% of ECBMF bus operators<sup>25</sup>, 12% of MTS Access bus operators, and 4% of trolley operators).

The 2017 Customer Satisfaction Survey found that most riders speak Spanish (about 39% of riders) at home, with the next most frequented language as Tagalog (about 4%), with a tie for third (Vietnamese and Chinese both at 1%).

All other staff observations (e.g. Customer Service, Transit Store, Public Meeting attendance, Front Desk Receptionists, Trolley Operators, Security etc.) either noted no interactions with LEP passengers speaking languages other than Spanish or that they occurred so rarely that they did not record such interactions.

Factor 2 analysis did not correlate with Factor 1 findings on the top languages spoken in MTS's service area. Factor 1 found the top three languages to be Spanish, Vietnamese and Tagalog. Factor 2 found the top two languages to be Spanish and Chinese with no clear top third language (Japanese, Tagalog or Arabic depending on the source). The demographic language data (Factor 1) differs from MTS' exposure to spoken languages (Factor 2) for many reasons, including, but not limited to:

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<sup>25</sup> The high number of contacts by ECD bus operators with LEP riders that speak Arabic may be due to the communities that the ECD routes serve.



- The frequency of public transportation usage differs among various language communities. They may utilize other transportation options such as families and neighbors, or travel needs are more localized within a community;
- Tourists may use MTS's website and MTS's mobile phone application more frequently than LEP persons living in MTS's service areas;
- LEP persons in MTS's service area may still review information in English regardless of the language they speak most frequently at home. For instance, based on the findings of the 2017 Customer Satisfaction Survey, 79% of riders who speak a second language at home can speak English "very well" (52%) or "well" (27%); and
- Some LEP persons may receive translation assistance from family or friends, and therefore not request interpretive services from MTS.

Due to the lower frequency of contacts and almost no demand for translation in languages other than Spanish, instead of maintaining written translations of vital documents for all Safe Harbor languages that may or may not be used, MTS will make available certain vital documents in other languages as necessary or upon request.

For Rider's Guides and Take Ones, which involve important information about service changes, MTS may decide on case by case situations that based on the area, subject matter, and local populations needs, to translate Rider's Guides and Take Ones in a Safe Harbor language (Vietnamese, Tagalog, Arabic, Chinese, Korean, Chaldean Neo-Aramaic, Russian, Filipino, Assyrian Neo-Aramaic, Mandarin, Lao, Farsi, Japanese, and Cantonese) as necessary. Otherwise, MTS will make available upon request.

MTS will provide written translation of all other vital documents in these Safe Harbor languages (and any other language) upon request pending available resources. Limiting factors for making documents available in these languages may include the ability to effectively display the information and locating a qualified translator for some of the languages. MTS remains committed to working with local community groups and other organizations to provide the necessary written access to vital documents.

Nonetheless, the MTS website ([www.sdmts.com](http://www.sdmts.com)) includes the Google Translation widget, which allows most all of MTS's website information to be translated into each of MTS's LEP languages, plus dozens of others. The following vital documents are available in all languages on MTS's website: Title VI Notice, Title VI Complaint Form, Title VI Complaint Process, availability of language assistance, translations, and interpretative services, and Application for Complementary Paratransit Service.

Table 7 below depicts the level of translation made available by MTS for vital written documents.

**Table 7: Vital Documents and Levels of Translation**

<b>Vital Documents and Level of Translation</b>						
<b>Language</b>	<b>LEP Population in Service Area</b>	<b>Readily Available Translation for all Vital Documents</b>	<b>Readily Available Translation on MTS Website of Title VI Complaint Form</b>	<b>Readily Available Translation through Google Translate Widget on MTS Website of Title VI Notice, Title VI Process, Notice of Language Assistance, and Application for Complementary Paratransit</b>	<b>Readily Available Translation for certain LEP populations if MTS determines appropriate due to Subject Matter and Area Affected for Rider's Guide and Take Ones</b>	<b>Pending Available Resources, Upon Request Translation for all Vital Documents</b>
Spanish	114,295	X	X	X	X	X
Vietnamese	12,276		X	X	X	X
Tagalog	6,303		X	X	X	X
Arabic	5,091		X	X	X	X
Chinese	4,633		X	X	X	X
Korean	2,855		X	X	X	X
Chaldean Neo-Aramaic	1,989		X	X	X	X
Russian	1,695		X	X	X	X
Filipino	1,675		X	X	X	X
Assyrian Neo-Aramaic	1,591		X	X	X	X
Mandarin	1,504		X	X	X	X
Lao	1,347		X	X	X	X
Farsi	1,301		X <sup>26</sup>	X	X	X
Japanese	1,181		X	X	X	X
Cantonese	1,024		X <sup>27</sup>	X	X	X

<sup>26</sup> It is MTS's understanding that the Title VI Complaint Form on MTS's Website currently translated into Persian may be used by a LEP person speaking Farsi. If that is not the case, please contact MTS Staff Attorney-Regulatory Compliance at [Samantha.Leslie@sdmts.com](mailto:Samantha.Leslie@sdmts.com) and MTS will review whether an additional translation is necessary.

<sup>27</sup> It is MTS's understanding that the Title VI Complaint Form on MTS's Website currently translated into traditional Chinese may be used by a LEP person speaking Cantonese. If that is not the case, please contact MTS Staff Attorney-Regulatory Compliance at [Samantha.Leslie@sdmts.com](mailto:Samantha.Leslie@sdmts.com) and MTS will review whether an additional translation is necessary.

## **B. Other Documents and Information (Excluding Vital Documents)**

MTS will endeavor to accommodate translation requests outside of the vital documents and Safe Harbor languages, pending considerations of cost and availability. The following are the types of documents and information MTS currently translates.

### **1. Bus and Trolley Service**

System maps, schedules, and timetables are provided in English and Spanish. Information and warning signs posted along the Trolley lines and at bus stops are also translated in both English and Spanish. Many bus operators and security officers are bilingual in English and Spanish. A few may be bilingual in English and another language besides Spanish. Bilingual English and Spanish ambassadors are assigned to stops and stations for special events and operational changes.

### **2. Rider Information Materials**

On-board communications, quarterly rider Newsletters and all fare information on board vehicles and on station platforms printed in English and Spanish, including public notices when fare changes are being considered. All MTS service advertising is printed in English and Spanish. All “How to Ride” information on board vehicles and on station platforms printed in English/Spanish.

### **3. Telephone Information and Customer Service**

MTS makes available Front-line administrative and call center assistance (MTS Information and Trip Planning, MTS Customer Service, MTS Compass Service Center) in English and Spanish.

### **4. Administrative Offices**

Bilingual English/Spanish receptionists staff the front desk in MTS lobbies and can provide assistance on the phone and in person to passengers. If assistance is needed for someone who speaks a language other than English or Spanish, staff will use google translate on their computers or on phones to assist as reasonably as possible.

### **5. Transit Store**

Most staff at Transit Store is bilingual in English and Spanish. If assistance is needed for someone who speaks a language other than English or Spanish, staff will use google translate on their computers or on phones to assist as reasonably as possible.

### **6. Public Meetings**

MTS may provide translation services for Board of Directors and other Committee meetings upon request, with advanced notice. MTS may also provide bilingual English and Spanish staff to attend public meetings when public comment assistance is requested.

As necessary based on the subject matter and local populations affected, notices regarding public meetings may be printed in languages other than English in regional and local newspapers.

#### 7. Outreach Events and Workshops

MTS may offer interpretive services for a specific event as necessary and as warranted by the local population affected. MTS may also provide bilingual English and Spanish staff to attend the outreach events and workshops. Fact sheets and comment cards produced in English and Spanish. Community-based outreach program is used as necessary to secure participation from underrepresented groups.

#### 8. Surveys

When conducting public opinion surveys, they are provided in English and Spanish on an as-needed basis for specific projects. Planning/outreach materials are produced in other languages as warranted by subject matter and meeting location, or upon request. Certain press releases and other notices are distributed to local newspapers and other community based media in languages other than English, translated by either MTS or by the media outlet. MTS also leverages community partners to help disseminate notice of availability of language assistance to LEP populations.

Table 8 summarizes the written and oral assistance measures MTS provides for the documents and information listed above in Section III (B).

**Table 8: LEP Assistance Measure by Language**

<b>Translation of Other Documents and Information (Excluding Vital Documents)</b>			
<b><u>Language</u></b>	<b><u>LEP Population</u></b>	<b><u>Written Assistance Measures</u></b>	<b><u>Oral Assistance Measures</u></b>
Spanish	114,295	<p>All web content translated via Google Translate.</p> <p>Word-for-word translation provided for schedules and surveys.</p> <p>Printed outreach materials for specific events, meetings, and changes translated as needed for specific areas or affected populations.</p> <p>All other documents translated upon request.</p>	<p>Readily available assistance at call centers and administrative offices.</p> <p>Interpretation may be available at public meetings, outreach events or other special events.</p>
Vietnamese	12,276	<p>All web content translated via Google Translate.</p> <p>Printed outreach materials for specific events, meetings, and changes translated as needed for specific areas or affected populations.</p> <p>All other documents will be translated upon request.</p>	<p>Interpretation available at public meetings with advanced notice.</p> <p>Translators readily provided for specific events and meetings as needed for specific areas or affected populations or upon request.</p>
Tagalog	6,303		
Arabic	5,091		
Chinese	4,633		
Korean	2,855		
Chaldean Neo-Aramaic	1,989		
Russian	1,695		
Filipino	1,675		
Assyrian Neo-Aramaic	1,591		
Mandarin	1,504		
Lao	1,347		
Farsi	1,301		
Japanese	1,181		
Cantonese	1,024		

#### **IV. Providing Notice to LEP Persons**

MTS provides notice to LEP persons about the availability of language assistance in the following ways:

- 1) MTS's Title VI Policy, located on MTS's Website, includes a summary of language assistance measures MTS provides. MTS's Title VI Policy on MTS's website also includes information about how to request additional information. Title VI Complaint forms translated in all languages identified in MTS's LAP and the Google translation Widget allows the entire Title VI website page (as well as any MTS website page) to be translated into any language.
- 2) MTS' Title VI Notice, which includes information about the public rights under Title VI and how to request the information in alternative formats, is provided in the:
  - a. lobby of the MTS administrative offices, which is printed in English and Spanish;

- b. in the lobby of the San Diego Transit administrative offices, which is printed in English and Spanish;
  - c. at the MTS Transit Store, which is printed in English and Spanish;
  - d. on fixed-route buses and trolleys through a Take One flyers (outlines important service and/or fare information critical to riders) posted 3x/year, which is printed in English and Spanish;
  - e. on Rider's Guides, which is printed in English and Spanish; and
  - f. on a decal placed within each paratransit vehicle, which is displayed in English and Spanish.
- 3) MTS's ADA Complaint Policy, located on MTS's Website, includes notice regarding assisting with writing complaints due to a disability or limited English Proficiency. The Google translation Widget allows this webpage, as well as every MTS webpage to be translated into any language.
  - 4) MTS's Complementary Paratransit Application, located on MTS's website, includes notice regarding requesting the application in alternative format. The application is available on the MTS Website in English and Spanish.
  - 5) MTS Board Meeting and other Committee Meeting Agendas include notice on how to request the agenda in alternative formats or to request other accommodations to facilitate meeting participation.
  - 6) MTS's Customer Service telephone line provides a verbal prompt regarding whether Spanish language assistance is requested.
  - 7) In notices or other advertisements regarding outreach events, notice of language assistance or interpretative services accommodations may be used as warranted by subject matter and meeting location.

## **V. Training Staff**

It is MTS's goal that employees who interact with customers know how to provide timely and reasonable language assistance to LEP populations.

MTS has three internal training functions: Bus Operator Training, Trolley Operator Training and Administrative Staff Training, which includes all customer service representatives, management and administrative staff.

For employees that regularly interact with customers, training will include:

- 1) How to respond to calls from LEP persons
  - a. This may include but is not limited to: employing Spanish speaking staff; training non-Spanish speaking employees with a basic Spanish phrases to communicate with customers if there is not a Spanish speaker immediately available; and contracting with outside companies and/or other community resources to assist in translating in languages other than Spanish, as necessary.

- 2) How to respond to correspondence from LEP persons
  - a. This may include, but is not limited to: employing staff that are able to write in Spanish; training staff to use Google Translate as needed; and contracting with outside companies and/or other community resources to assist in translating correspondence in languages other than Spanish, as necessary.
- 3) How to respond to LEP persons in person
  - a. This may include, but is not limited to: requesting assistance from dispatch who may be able to use bilingual staff; providing passenger the Customer Service phone number who may be able to use bilingual staff or a language assistance phone line to help translate information; asking whether any other passengers or staff nearby could provide translation assistance; if not a bus or trolley operator, using Google Translate if a computer or mobile phone is available and use would not cause any safety concerns; if on MTS Access, letting the drop off location know that the passenger has a question the bus operator was unable to assist with; and having staff making their best, professional attempts to communicate with the passenger on the spot (e.g. using hand gestures or directional cues).

MTS will conduct reviews as necessary to assess the effectiveness of LEP training materials. Any areas of improvement will be addressed as resources and time allow.

## **VI. Monitoring and Updating the LAP**

MTS will monitor the LAP every 3 years to determine whether the language assistance measures are still effective and whether any improvements or changes are necessary. The most recent version of MTS's LAP will be included in MTS's Title VI Plan, which is updated every 3 years. The data used to identify LEP persons in MTS's service area is compiled by SANDAG every 4 years and any updated data will be incorporated accordingly into MTS's LAP upon receipt.

The plan will be monitored using one or more of the following measures:

- 1) Seeking staff feedback to determine the effectiveness and usefulness of the LAP, which may include, but is not limited to:
  - a. an assessment of whether staff members that come into contact with LEP persons understand what language assistance measures are available and how they can be implemented
  - b. surveying staff to determine what type of requests for translation and interpretation were received and when they were provided
  - c. surveying staff to determine the frequency of which information is translated on MTS Website or MTS phone applications through the Google Widget
  - d. surveying staff on the frequency of interactions with LEP persons
  - e. surveying staff about feedback received during interactions from LEP persons that may relate to the effectiveness of MTS's language assistance measures

- 2) Reviewing the availability of resources, including technological advances, and the costs imposed.

Data identifying LEP populations in MTS service area is current as of June 6, 2019 (See Factor 1 of MTS LAP). The last date in which this LAP was reviewed and updated was on November 25, 2019.