



# Language Assistance Plan 2023



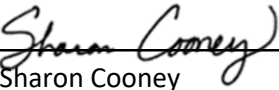
SAN DIEGO METROPOLITAN TRANSIT SYSTEM

Subject: Language Assistance Plan

Effective Date: March 3, 2023

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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:**

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. with a population of nearly 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, Green Line and Silver Line) with a total of 63 stations and 65.2 miles of rail. MTS also operates approximately 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. In Fiscal Year 2019, MTS generated 85 million annual passenger trips, and 275,000 trips each weekday (due to the pandemic, Fiscal Year 2022 ridership was 58 million, and 182,000 on an average weekday). To handle the demand, MTS schedules approximately 7,000 trips each weekday, and has 179 light rail cars and 731 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 (3) times per year and as needed to improve efficiency and customer service.

MTS is governed by a 15-member Board of Directors. Members are appointed as follows: four (4) appointed from the City of San Diego (the Mayor of San Diego and three (3) San Diego City Council members); two (2) appointed from the City of Chula Vista (the Mayor of Chula Vista and a Chula Vista City Council Member); one (1) appointed from city council of Coronado; one (1) appointed from city council of El Cajon; one (1) appointed from city council of Imperial Beach; one (1) appointed from city council of La Mesa; one (1) appointed from city council of Lemon Grove; one (1) appointed from city council of National City; one (1) appointed from city council of Poway; one (1) appointed from city council of Santee; and one (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 or virtually, as authorized. MTS Board of Directors meetings, along with other Committee meetings, are public meetings available for the public to attend (in-person and/or virtually, depending on the meeting format) 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. San Diego Association of Governments (SANDAG), the metropolitan planning organization for the San Diego region, used their Geographic Information Systems (GIS) and Title VI team to assist MTS in compiling data for Factor 1 of the Four Factor Analysis

Table 1 identifies LEP communities and the number of LEP persons from each language group, other than English, with at least 1,000 speakers or 5% of the MTS service area population, spoken by people age five (5) and older in MTS's service area<sup>1</sup>. The source of this data is the U.S. Census Bureau, American Community Survey (ACS) 5-Year Public Use Microdata Sample (PUMS) 2013-2017 (also referred to as the 2019 ACS in other parts of this document). **Please note**, the ACS has discontinued the PUMS by language spoken and thus MTS is of the understanding that there is no current data available that can be broken out into each language spoken only within MTS's jurisdiction. MTS uses the same ACS PUMS 2013-2017 from the previous LAP, as it is the most recent relevant data available. Since this is the only language dataset that specifically looks at MTS's jurisdiction, it has been included here for reference and to meet the minimum requirements of a LAP.

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<sup>1</sup> Threshold used for identifying languages spoken is consistent with the Safe Harbor Provision, prescribed by Title VI regulations and other supplementing guidance from the FTA.

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

LEP Speakers by Language in MTS's Jurisdiction Source: ACS PUMS 2013-2017			
Language	LEP MTS Population	Percent of All LEP Speakers in MTS Jurisdiction	Percent of Total MTS Population Age 5 and Older
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%

Table 2 identifies LEP communities and the number of LEP persons from each language group with at least 1,000 speakers, spoken by people age five (5) and older, who stated they spoke English less than “very well” in the City of San Diego<sup>2</sup>. The source of this data is the ACS 1-Year Estimates Detailed Tables 2021. **Please note**, this data is only for the City of San Diego population. MTS’s jurisdiction covers the greater southern and eastern San Diego County region, not just the City of San Diego. This dataset is not dispositive because it does not account for a significant portion of MTS’s service area and thus MTS is only using this data for references purposes.

**Table 2: LEP Speakers by Language in City of San Diego**

<b>LEP Speakers by Language in City of San Diego</b>			
<b>Source: ACS 2021 (1-year PUMS)</b>			
<b>Language</b>	<b>LEP City of San Diego Population</b>	<b>Percent of all LEP speakers in City of San Diego</b>	<b>Percent of Total City of San Diego Population Age 5 and Older</b>
<b>Spanish</b>	94,429	52.15%	7.21%
<b>Chinese (incl. Mandarin, Cantonese)</b>	16,386	9.05%	1.25%
<b>Vietnamese</b>	15,949	8.81%	1.22%
<b>Tagalog (incl. Filipino)</b>	15,160	8.37%	1.16%
<b>Korean</b>	4,899	2.71%	0.37%
<b>Persian (incl. Farsi, Dari)</b>	4,128	2.28%	0.32%
<b>Thai, Lao, or other Tai-Kadai languages</b>	3,840	2.12%	0.29%
<b>Japanese</b>	3,275	1.81%	0.25%
<b>Arabic</b>	2,983	1.65%	0.23%
<b>Amharic, Somali, or other Afro-Asiatic languages</b>	2,942	1.62%	0.22%
<b>Russian</b>	2,935	1.62%	0.22%
<b>Hindi</b>	2,325	1.28%	0.18%
<b>Other languages of Asia</b>	1,469	0.81%	0.11%
<b>Ilocano, Samoan, Hawaiian, or other Austronesian languages</b>	1,373	0.76%	0.10%
<b>Portuguese</b>	1,281	0.71%	0.10%

<sup>2</sup> 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. Since this data is only for the City of San Diego, and not for MTS’s entire service area, MTS cannot complete the analysis for LEP speakers at 5% of the total service area population. Thus, MTS has only used languages spoken by at least 1,000 individuals when compiling Table 2.

Table 3 identifies LEP communities and the number of LEP persons from each language group with at least 1,000 speakers, spoken by people age five (5) and older, in MTS's service area (broken out by City of San Diego, City of Chula Vista, Unincorporated Areas of County of San Diego<sup>3</sup>, City of El Cajon, City of La Mesa, City of Santee, City of National City, City of Poway, City of Imperial Beach, City of Lemon Grove and City of Coronado)<sup>4</sup>. The source of this data is the Five-Year ACS (2016-2020). **Please note**, this dataset does not include whether the individuals spoke English "less than very well", "not well" or "not at all". Since it is unclear how many of these individuals speak English "less than very well", "not well" or "not at all", it does not assist with the analysis of determining how many of these individuals are LEP. **Further**, this dataset uses all the Unincorporated Area of County of San Diego, which includes some parts that are within NCTD's service area. Thus, MTS is only using this dataset for reference purposes.

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<sup>3</sup> The Communities within the Unincorporated Area of County of San Diego within MTS's service area include: Alpine, Bonita, Borrego Springs, Bostonia, Boulevard, Campo, Casa de Oro-Mount Helix, Crest, Descanso, Eucalyptus Hills, Fairbanks Ranch, Harbison Canyon, Jacumba, Jamul, Julian, Lakeside, Mount Laguna, Pine Valley, Potrero, Rancho San Diego, Rancho Santa Fe, Spring Valley, and Winter Gardens.

<sup>4</sup> 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. Since this includes parts of the Unincorporated Area of the County of San Diego that is not within MTS's jurisdiction, but instead within NCTD's service area, MTS cannot complete the analysis for LEP speakers at 5% of the total service area population. Thus, MTS has only used languages spoken by at least 1,000 individuals when compiling Table 3.

Table 3: LEP Speakers within MTS's Service Area

LEP Speakers by Language in MTS's Service Area) Source: ACS 5 year (2016-2020)																						
Language	LEP San Diego Pop. and % of Total San Diego Pop. Age 5 & Older		LEP Chula Vista Pop. and % of Total Chula Vista Pop. Age 5 & Older		LEP <b>Unincorporated Area of County of San Diego</b> Pop. and % of Total <b>Unincorporated Area of County of San Diego</b> Pop. Age 5 & Older		LEP El Cajon Pop. and % of Total El Cajon Pop. Age 5 & Older		LEP La Mesa Pop. and % of Total La Mesa Pop. Age 5 & Older		LEP City of <b>Santee</b> Pop. and % of Total <b>Santee</b> Pop. Age 5 & Older		LEP <b>National City</b> Pop. and % of Total <b>National City</b> Pop. Age 5 & Older		LEP <b>Poway</b> Pop. and % of Total <b>Poway</b> Pop. Age 5 & Older		LEP <b>Imperial Beach</b> Pop. and % of Total <b>Imperial Beach</b> Pop. Age 5 & Older		LEP <b>Lemon Grove</b> Pop. and % of Total <b>Lemon Grove</b> Pop. Age 5 & Older		LEP <b>Coronado</b> Pop. and % of Total <b>Coronado</b> Pop. Age 5 & Older	
<b>Spanish</b>	96,414	7.38%	39,943	15.48%	9,564	5.07%	6,565	6.67%	1,663	2.94%	1,238	2.22%	10,621	19.74%	1,694	3.67%	2,764	11.14%	1,887	7.29%	395	1.99%
<b>Vietnamese</b>	17,810	1.36%	367	0.14%	267	0.14%	186	0.19%	245	0.43%	186	0.33%	53	0.10%	554	1.20%	5	0.02%	302	1.17%	-	0.00%
<b>Chinese (incl. Mandarin, Cantonese)</b>	16,406	1.26%	927	0.36%	168	0.09%	325	0.33%	363	0.64%	267	0.48%	41	0.08%	498	1.08%	9	0.04%	3	0.01%	28	0.14%
<b>Tagalog (incl. Filipino)</b>	14,567	1.11%	4,222	1.64%	1,189	0.63%	392	0.40%	105	0.19%	154	0.28%	3,687	6.85%	358	0.78%	183	0.74%	181	0.70%	60	0.30%
<b>Other Asian and Pacific Island languages</b>	11,564	0.88%	1,018	0.39%	478	0.25%	435	0.44%	219	0.39%	200	0.36%	209	0.39%	197	0.43%	55	0.22%	212	0.82%	20	0.10%
<b>Other Indo-European languages</b>	8,858	0.68%	316	0.12%	542	0.29%	884	0.90%	168	0.30%	232	0.42%	10	0.02%	792	1.71%	52	0.21%	96	0.37%	65	0.33%
<b>Korean</b>	4,933	0.38%	1,054	0.41%	24	0.01%	113	0.11%	34	0.06%	7	0.01%	7	0.01%	126	0.27%	-	0.00%	16	0.06%	-	0.00%
<b>Other and unspecified languages</b>	4,906	0.38%	119	0.05%	1,428	0.76%	2,896	2.94%	231	0.41%	202	0.36%	150	0.28%	127	0.27%	12	0.05%	195	0.75%	85	0.43%
<b>Russian, Polish, or other Slavic languages</b>	3,859	0.30%	96	0.04%	233	0.12%	124	0.13%	404	0.72%	106	0.19%	-	0.00%	230	0.50%	55	0.22%	13	0.05%	-	0.00%
<b>Arabic</b>	2,871	0.22%	102	0.04%	1,637	0.87%	7,190	7.31%	102	0.18%	477	0.86%	45	0.08%	168	0.36%	105	0.42%	19	0.07%	-	0.00%
<b>French, Haitian, or Cajun</b>	840	0.06%	19	0.01%	38	0.02%	21	0.02%	34	0.06%	16	0.03%	-	0.00%	17	0.04%	38	0.15%	23	0.09%	-	0.00%

Figure 1 Map identifies areas with all LEP speakers who speak English “less than very well” or “not well” or “not at all” that are at or below, or above, the MTS jurisdiction average of all LAP speakers. The MTS jurisdiction average for people age five (5) and older for LEP populations is 14.71%.

Figure 2 Map identifies areas with specifically **Spanish** LEP speakers who speak English “less than very well” or “not well” or “not at all” that are at or below, or above, the MTS jurisdiction average of Spanish speaking LAP population. The MTS jurisdiction average for people age five (5) years and older for Spanish speaking LEP populations is 8.59%.

Figure 1: LEP Speakers that Speak English “less than very well”, “not well” or “not at all”

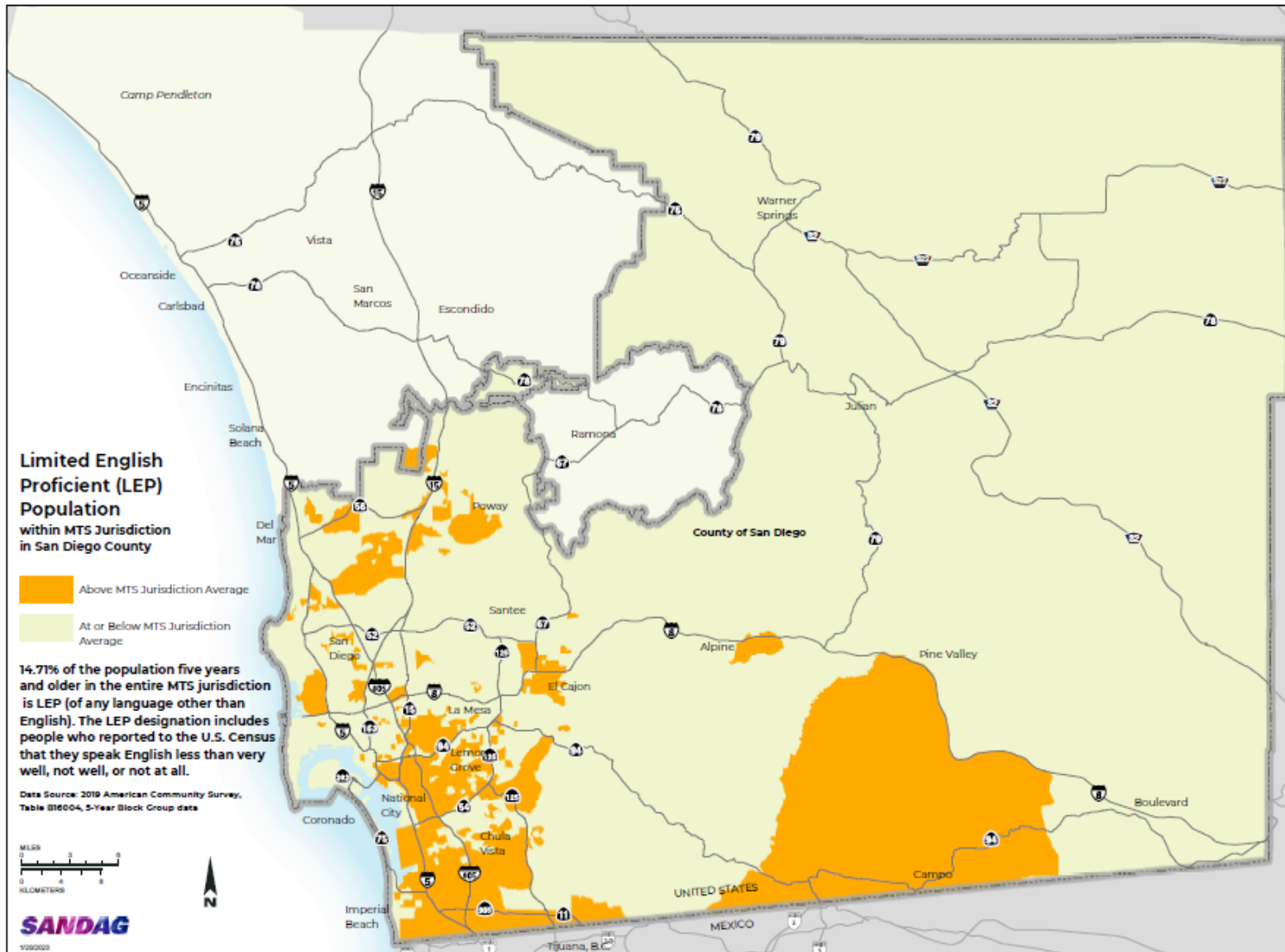
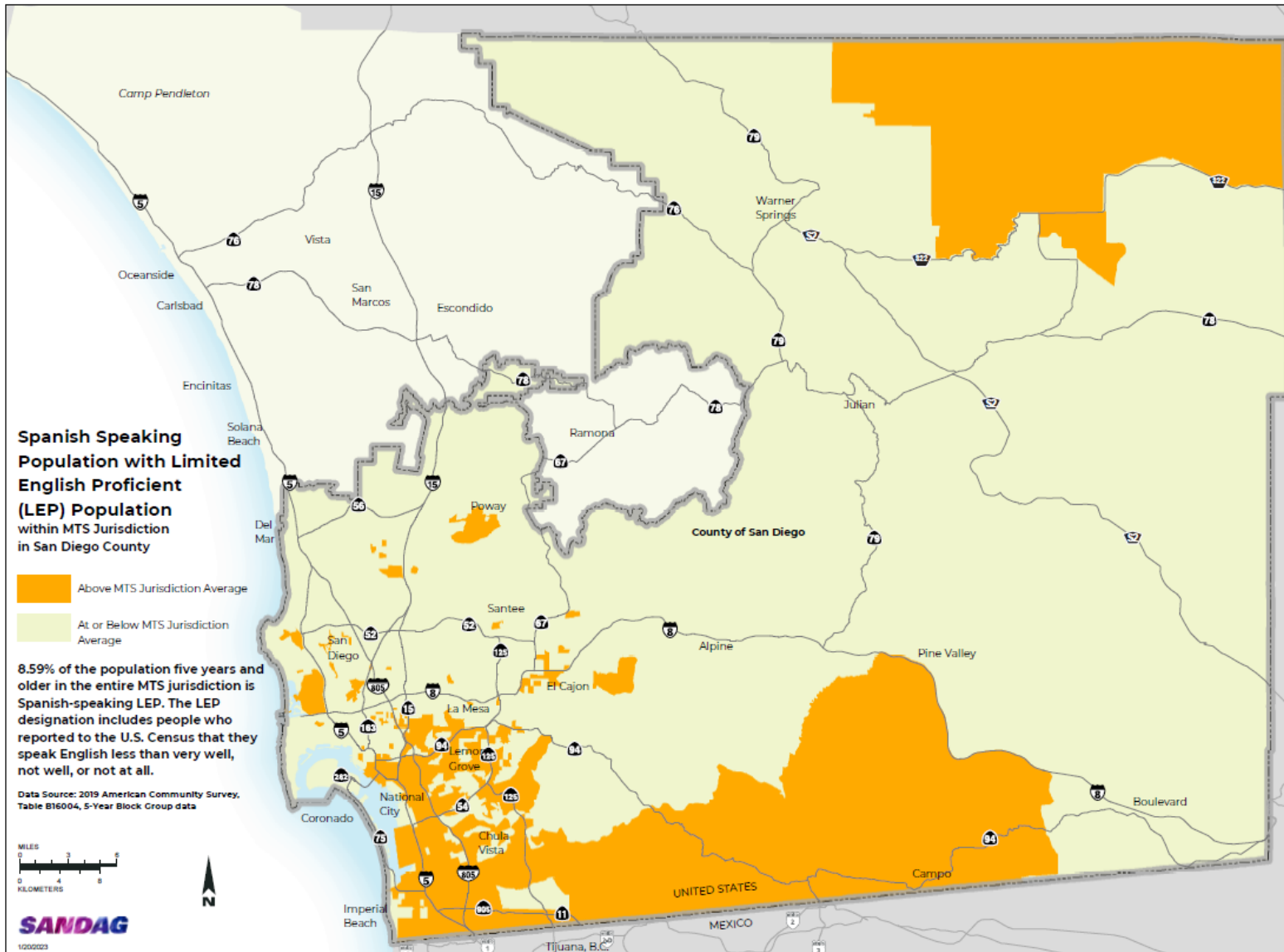


Figure 2: Spanish Speaking LEP that speak English “less than very well,” “not well” or “not at all”



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

No data<sup>5</sup> was available regarding the literary skills of LEP populations. However, as discussed further in Section III of this LAP, MTS provides both oral interpretation 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>6</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, fare 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>7</sup>. The survey has been broken out by operating divisions.

Table 4 shows the results from bus operators that operate routes from Imperial Avenue Division (IAD). IAD operates service primarily within the urbanized area of the City of San Diego. Out of a total of 262 operators that operate from IAD, 143 bus operators participated in the survey.

Table 5 shows the results from bus operators that operate routes from Kearny Mesa Division (KMD). KMD operates service primarily within the urbanized area of San Diego. Out of a total of 192 operators that operate from KMD, 66 participated in the survey.

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<sup>5</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>6</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>7</sup> An anonymous survey was administered to bus operators in October 2022. For purposes of this LAP, staff used their best efforts to group similar worded responses.

Table 6 shows the results from bus operators that operate routes from South Bay Division (SBD). SBD operates service through the South Bay cities and communities, as well as some City of San Diego communities in its urban core as far north as Mira Mesa. Out of a total of 389 bus operators that operate from SBD, 28 participated in the survey.

Table 7 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 107 bus operators that operate from ECD, 59 participated in the survey.

Copley Park Division (CPD) serves both fixed routes and MTS's complementary paratransit service, MTS Access. There are 56 bus operators that operate fixed route from CPD. See Table 8 for combined results between MTS Access and CPD fixed route bus operators.

Table 4: Frequency of Contacts with LEP Riders - IAD Bus Operators

Frequency of contacts with LEP riders – IAD Bus Operators									
<u>Language</u>	<u>LEP Population in Service Area</u>		<u>Total of 143 Operators completed survey</u>	<u>Daily</u>	<u>Weekly</u>	<u>Monthly</u>	<u>Yearly</u>	<u>Rarely</u>	<u>Unknown Frequency</u>
Spanish	114295	68.54%	141	106	20	4		3	8
Chinese	4633	2.78%	80	15	19	12	7	14	13
Filipino	1675	1.00%	74	11	20	7	8	17	11
Italian			70	5	10	19	11	13	12
French			69	12	7	15	5	19	11
Arabic	5091	3.05%	66	6	12	7	6	17	18
Tagalog	6303	3.78%	62	12	11	9	3	15	12
Japanese	1181	0.71%	62	7	13	12	6	14	10
Portuguese			62	6	10	9	10	12	15
Assyrian Neo-Aramaic	1591	0.95%	59	6	2	2	4	8	37
Unknown Language			58	10	13	9		5	21
Cantonese	1024	0.05%	57	8	8	3	6	14	18
Korean	2855	1.71%	56	8	10	7	8	12	11
German			54	4	6	6	11	15	12
Russian	1695	1.02%	53	4	4	10	9	13	13
Chaldean	1989	1.19%	53	4	3	1	5	15	25
Mandarin	1504	0.90%	51	7	8	4	5	10	17
Farsi	1301	0.78%	47	2	5	5	2	10	23
Lao	1347	0.81%	44	4	4	5	6	12	13
Vietnamese	12276	7.36%	37	3	10	11	3	5	5
Sign language			5				1	1	3

Table 5: Frequency of Contacts with LEP riders - KMD Bus Operators

Frequency of contacts with LEP riders – KMD Bus Operators									
<u>Language</u>	<u>LEP Population in Service Area</u>		<u>Total of 66 Operators completed survey</u>	<u>Daily</u>	<u>Weekly</u>	<u>Monthly</u>	<u>Yearly</u>	<u>Rarely</u>	<u>Unknown Frequency</u>
Spanish	114295	68.54%	57	50	6	1			
Chinese	4633	2.78%	36	8	5	7	8	1	7
Arabic	5091	3.05%	32	1	7	2	9	6	7
French			32	1	4	7	8	4	8
Italian			29	1	2	7	6	2	11
Korean	2855	1.71%	28	2	3	5	4	7	7
Filipino	1675	1.00%	27	4	2	8	3	5	5
Tagalog	6303	3.78%	26	2	4	5	3	6	6
Japanese	1181	0.71%	26	2	3	6	5	6	4
Unknown Language			24	2	4	3	1	1	13
Vietnamese	12276	7.36%	23	2	3	4	1	8	5
Portuguese			23			3	5	4	11
Russian	1695	1.02%	21	2		3	6	3	7
Mandarin	1504	0.90%	21			3	3	5	10
Lao	1347	0.81%	21			2	2	4	13
German			20		2	4	4	5	5
Farsi	1301	0.78%	20			2	3	5	10
Cantonese	1024	0.61%	19		2		4	4	9
Chaldean	1989	1.19%	18	1		2	2	3	10
Assyrian Neo-Aramaic	1591	0.95%	17				2	2	13
Sign language			3			1			2

Table 6: 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>Total of 28 Operators completed survey</u>	<u>Daily</u>	<u>Weekly</u>	<u>Monthly</u>	<u>Yearly</u>	<u>Rarely</u>	<u>Unknown Frequency</u>
Spanish	114295	68.54%	20	19	1				
French			11	2	5	2	1	1	
Vietnamese	12276	7.36%	10	5	1	3			1
Filipino	1675	1.00%	9	7		1	1		
Tagalog	6303	3.78%	7	3	2	1	1		
Arabic	5091	3.05%	7	3		2	1	1	
Portuguese			7	2	1	2	1	1	
Chinese	4633	2.78%	6	4			1	1	
Russian	1695	1.02%	6	2		2	1	1	
German			6	2		2		2	
Mandarin	1504	0.90%	6	1	4			1	
Farsi	1301	0.78%	6		5		1		
Italian			5	1	1	2	1		
Korean	2855	1.71%	5	1	1	2		1	
Japanese	1181	0.71%	4	2	1		1		
Unknown Language			3	1	1				1
Chaldean	1989	1.19%	3		2				1
Cantonese	1024	0.61%	3			2		1	
Lao	1347	0.81%	2		1				1
Turkish			1				1		
Assyrian Neo-Aramaic	1591	0.95%	1						1

Table 7: Frequency of Contacts with LEP Riders - ECD Bus Operators

Frequency of contacts with LEP riders – ECD Bus Operators									
Language	LEP Population in Service Area		Total of 59 Operators completed survey	Daily	Weekly	Monthly	Yearly	Rarely	Unknown Frequency
Spanish	114295	68.54%	52	39	8	4			1
Arabic	5091	3.05%	40	21	9	8	1		1
Chaldean	1989	1.19%	27	14	6	4		1	2
Filipino	1675	1.00%	17	8	2	4	1		2
Unknown Language			16	6	1	4	1	1	3
Tagalog	6303	3.78%	15	5	1	3	1	2	3
Chinese	4633	2.78%	14	4	2	3	3	1	1
Farsi	1301	0.78%	13	4	1	2	1	3	2
Vietnamese	12276	7.36%	12	3	2	2	1	2	2
Japanese	1181	0.71%	11	3	2	2	1	1	2
Russian	1695	1.02%	11	2	1	2	1	3	2
French			10	3	1	1	2	2	1
Cantonese	1024	0.61%	10	2	2	2		1	3
Mandarin	1504	0.90%	10	2	1	2		3	2
German			10	2	1	1	2	2	2
Korean	2855	1.71%	9	3	2	1		2	1
Lao	1347	0.81%	9	2	1	1		1	4
Portuguese			9	2		1	1	2	3
Italian			8	2	1		1	1	3
Assyrian Neo-Aramaic	1301	0.78%	8	2	1			1	4
Sign language			2	2					
Haitian Creole			1		1				
Dari-Persian			1			1			
Luganda			1			1			

## 2. Complementary Paratransit Service

LEP individuals may come into contact with MTS's Complementary ADA Paratransit Service (MTS Access) during the application process, trip reservation process, or while on the MTS Access vehicle. MTS Access provides service to individuals with disabilities who cannot use fixed-route bus 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 apply online, which offers translation into any language available on the 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. In house bilingual staff has translated correspondence with the help of Google Translate. Staff then proofread correspondence to ensure the information is accurate and easily understandable and make any needed corrections. 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 were received out of a total of 2,060 applications submitted (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 who 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 either by requesting a Functional Assessment or requesting the appeal be heard by 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 functional assessments or MTS Access Appeals Board 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 two (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. Reservations can be made by phone, TDD, online web portal and mobile application. Web and mobile applications are available in English and Spanish for use. 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

MTS Access provides trips to origins and destinations within three-fourths of a mile on each side of each fixed route for individuals with disabilities who cannot use fixed route service. LEP individuals may come into contact with MTS Access, as MTS Access vehicle 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 vehicle operators<sup>8</sup>.

Table 8 shows the survey results from MTS Access vehicle operators<sup>9</sup>. Out of a total of 63 MTS Access operators, 13 operators participated in the survey.

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<sup>8</sup> An anonymous survey was administered to bus operators in October 2022. For purposes of this LAP, staff used their best efforts to group similar worded responses into categories of frequency.

<sup>9</sup> About 10% of the responses may have been completed by operators who do not drive for MTS Access. First Transit, MTS's third-party contractor, operates MTS Access and some MTS fixed bus routes that use mini-buses. Mini buses are operated out of the Copley Park Division, which operates 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, but not MTS Access. Please note, this survey was not provided to taxi operators who subcontract to First Transit to operate some MTS Access service. For future LEP surveys, MTS will review how best to administer this survey to taxi operators.

Table 8: Frequency of Contacts with LEP riders - MTS Access Vehicle Operators

Frequency of contacts with LEP riders – MTS Access Vehicle Operators									
<u>Language</u>	<u>LEP Population in Service Area</u>		<u>Total of 13 Operators completed survey</u>	<u>Daily</u>	<u>Weekly</u>	<u>Monthly</u>	<u>Yearly</u>	<u>Rarely</u>	<u>Unknown Frequency</u>
Spanish	114295	68.54%	12	11	1				
Filipino	1675	0.07%	8			1	6		1
Mandarin	1504	0.90%	7			1	3		3
Cantonese	1024	0.05%	7				4		3
Italian			7				4		3
Arabic	5091	3.05%	7				3		4
Assyrian Neo-Aramaic	1591	0.95%	7				3		4
Japanese	1181	0.71%	6			1	3		2
Korean	2855	1.71%	6			1	3		2
Chaldean	1989	1.19%	6				3		3
French			6				3		3
German			6				3		3
Lao	1347	0.81%	6				3		3
Portuguese			6				3		3
Chinese	4633	2.78%	5			1	4		
Tagalog	6303	3.78%	5			1	2		2
Vietnamese	12276	7.36%	5			1	2		2
Farsi	1301	0.78%	5				3		2
Russian	1695	1.02%	5				1		4
Unknown Language			4				1		3

### 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: out of 161 trolley operators employed, 51 trolley operators speak a language other than English (39 speak Spanish, two (2) speak Mandarin, one (1) speaks Flemish, one (1) speaks Arabic, one (1) speaks Croatian, one (1) speaks Serbian, one (1) speaks German, one (1) speaks Cantonese, one (1) speaks Vietnamese, one (1) speaks Chinese, one (1) speaks French and one (1) speaks Korean)<sup>10</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>11</sup>. Out of a total of 161 trolley operators, 13 trolley operators participated in the survey.

Table 9 shows the results from trolley operators that operate routes throughout MTS's service area.

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<sup>10</sup> Provided by MTS Chief Operating Officer of Rail in November 2022.

<sup>11</sup> An anonymous survey was administered to trolley operators in October 2022. For purposes of this LAP, staff used their best efforts to group similar worded responses into categories of frequencies.

Table 9: Frequency of Contacts with LEP riders - Trolley Operators

Frequency of contacts with LEP riders – Trolley Operators									
<u>Language</u>	<u>LEP Population in Service Area</u>		<u>Total of 13 Operators completed survey</u>	<u>Daily</u>	<u>Weekly</u>	<u>Monthly</u>	<u>Yearly</u>	<u>Rarely</u>	<u>Unknown Frequency</u>
Spanish	114295	68.54%	10	7	3				
Chinese	4633	2.78%	4			1	1	2	
Unknown Language			4				1	1	2
German			3			2	1		
Cantonese	1024	0.05%	3			1	1		1
Japanese	1181	0.71%	3			1		2	
Russian	1695	1.02%	3			1		1	1
Arabic	5091	3.05%	2			2			
Korean	2855	1.71%	2			2			
French			2			1	1		
Vietnamese	12276	7.36%	2			1	1		
Sign language			2			1		1	
Chaldean	1989	1.19%	1		1				
Filipino	1675	0.07%	1		1				
Lao	1347	0.81%	1			1			
Mandarin	1504	0.90%	1			1			
Croatian			1			1			
Tagalog	6303	3.78%	1				1		
Assyrian Neo-Aramaic	1591	0.95%	1						1
Farsi	1301	0.78%	1						1
Italian			1						1
Portuguese			1						1

#### 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, at trolley stations and on buses, 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: Out of a total of 55 CCIs, there are 35 that speak Spanish; and out of a total of 206 TSS Officers, there are 93 that speak Spanish, three (3) that speak Tagalog, three (3) that use American Sign Language, two (2) that speak Vietnamese, and eight (8) that speak other languages (e.g. Farsi, French, Russian, Creole, Igbo, Swahili, Arabic); and out of the Security Administrative staff, there are four (4) that speak Tagalog, one (1) that speaks Persian, and one (1) that speaks Vietnamese<sup>12</sup>.

In addition, MTS administered a survey regarding the frequency in which LEP persons come into contact with MTS Code Compliance Inspectors. Out of a total of 55 CCIs, 25 CCIs participated in the survey.

Table 10 shows the survey results from the CCIs.

Lastly, MTS administered a survey regarding the frequency in which LEP persons come into contact with Transit System Security Officers. Out of a total of 206 TSS Officers, 14 TSS Officers participated in the survey.

Table 11 shows the survey results from TSS Officers.

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<sup>12</sup> Provided by Deputy Director of Transit Enforcement on November 29, 2022.

Table 10: Frequency of Contacts with LEP Riders - MTS Security, Code Compliance Inspectors

Frequency of contacts with LEP riders – MTS Security, Code Compliance Inspectors									
<u>Language</u>		<u>LEP Population in Service Area</u>	<u>Total of 25 Code Compliance Inspectors</u>	<u>Daily</u>	<u>Weekly</u>	<u>Monthly</u>	<u>Yearly</u>	<u>Rarely</u>	<u>Unknown Frequency</u>
Spanish	114295	68.54%	23	21		1	1		
Chinese	4633	2.78%	14	1	3	3	1	6	
Filipino	1675	0.07%	14		3	4	2	3	2
Arabic	5091	3.05%	14		3	3	3	5	
French			14		3	1	2	6	2
Portuguese			13		1	4	2	5	1
Tagalog	6303	3.78%	12		2	4	3	1	2
Italian			12		1	2	3	4	2
German			12		1		2	7	2
Japanese	1181	0.71%	11			5		4	2
Farsi	1301	0.78%	10		2	3		3	2
Korean	2855	1.71%	10		1	5		4	
Mandarin	1504	0.90%	10			2	3	2	3
Chaldean	1989	1.19%	9		1	1		5	2
Vietnamese	12276	7.36%	9			4	1	2	2
Russian	1695	1.02%	9			2		5	2
Cantonese	1024	0.05%	9			2		4	3
Lao	1347	0.81%	9			2		4	3
Assyrian Neo-Aramaic	1591	0.95%	8			1		3	4
Unknown Language			7			1		3	3
Sign Language			1			1			

Table 11: Frequency of Contacts with LEP Riders - MTS Security, Transit System Security Officers

Frequency of Contacts with LEP Riders – MTS Security, Transit System Security Officers									
<u>Language</u>	<u>LEP Population in Service Area</u>		<u>Total of 14 Transit System Security Officers completed survey</u>	<u>Daily</u>	<u>Weekly</u>	<u>Monthly</u>	<u>Yearly</u>	<u>Rarely</u>	<u>Unknown Frequency</u>
Spanish	114295	68.54%	11	9		2			
Chinese	4633	2.78%	8			4	1	2	1
Portuguese			8			4	1	1	2
Filipino	1675	0.07%	7	1	2	1		2	1
Russian	1695	1.02%	7		1	1		2	3
Arabic	5091	3.05%	7			3		2	2
Italian			7			1	2	4	
French			7				2	3	2
Tagalog	6303	3.78%	6		1	2		3	
Farsi	1301	0.78%	6		1	2		1	2
Mandarin	1504	0.90%	6		1	2			3
Cantonese	1024	0.05%	6			2			4
Korean	2855	1.71%	6			1	2		3
Japanese	1181	0.71%	6			1	1	2	2
Chaldean	1989	1.19%	6			1			5
Lao	1347	0.81%	6				1	1	4
Unknown Language			6				1	1	4
German			6					4	2
Assyrian Neo-Aramaic	1591	0.95%	6					1	5
Vietnamese	12276	7.36%	5			1	1	1	2

## 5. Purchase of passes and tickets

Passengers can purchase fares, passes and tickets through the following methods: Ticket Vending Machines (TVMs), bus fareboxes, participating retail outlets, through other agencies or organizations (i.e. schools, social service agencies employers), Transit Store, mobile application, phone, and website. Data is limited in terms of how many LEP passengers use each of these methods to purchase tickets and passes.

### a. TVM

TVMs are located at all trolley stations and some outlets. The TVM visual and audio prompts can be displayed in English, Spanish, Vietnamese, Chinese or Tagalog. If a LEP passenger has questions regarding how to use the TVM, a phone number to the PRONTO Support Center is provided on the TVM. Most employees at the PRONTO Support Center are bilingual, but if additional language services are needed, the PRONTO Support Center can transfer the call to another department, such as MTS Customer Service or Information & Trip Planning. There is no data or general observations maintained on how often LEP individuals use TVMs.

### b. Bus Farebox

Depending on the bus, MTS provides two (2) types of fareboxes on buses. The first type has an electronic display (e.g. "Fare Due") and the readout is provided in English. The second type is a clear glass farebox that is not digital, but instead accepts bills and coins through a slanted opening in its lid. On both the electronic 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. While there is no data maintained on how often LEP individuals use the bus fareboxes, information on how often LEP persons come into contact with bus operators was collected through the operator surveys as reported above.

### c. Retail Outlets

MTS utilizes Ready Credit's network of outlets across the San Diego region as its primary third-party outlet for the purchase and reload of PRONTO cards. 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. Other Agencies or Organizations

Through MTS's various pass programs, MTS sells passes to other agencies, schools, or organizations who in turn provide and/or sell these passes to their employees or clients. This includes bulk day passes, college passes, employer pass programs and PRONTO Extend. There is no data and/or general observations maintained on how often LEP individuals use these outlets to buy fares or passes.

e. Transit Store

The Transit Store offers the public an in-person place for general inquiries, for purchase MTS bus and trolley passes, MTS Access passes, and all reduced fare PRONTO 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 (or NCTD Customer Service Center) to purchase their reduced fare PRONTO 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 application 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 98%) and in Spanish (about 2%); about 140 interactions a day occur with Spanish speaking passengers out of 200 interactions daily at the Transit Store; and about 100 interactions a year, or about 2 times a week, occur in languages other than English or Spanish at the Transit Store, which has included the following: Tagalog, Chinese, Russian, American Sign Language, Korean, Arabic, Farsi, French and Portuguese<sup>13</sup>.

f. Website – ridePRONTO.com

In the last year, of 479,096 of passengers who visited MTS's online site (ridePRONTO.com) to purchase PRONTO Card passes, the languages used to review the information included: 91.23% in English; 7.29% in Spanish; 0.81% in Chinese; 0.26% used Japanese; 0.20% in German; 0.17% used French; 0.13% used Korean; and 0.1% used Portuguese<sup>14</sup>.

g. Website – 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 5,693 passengers who visited Estore, the languages used to review the information were: 94.99% in English; 3.35% in Spanish; 0.57% in Chinese; 0.28% in German; 0.19 in Czech; 0.15% in French; and 0.1% in Japanese<sup>15</sup>.

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<sup>13</sup> Provided by Transit Store Manager in November 2022.

<sup>14</sup> Data provided by Google Analytics for the period of July 1, 2021 to June 30, 2022.

<sup>15</sup> Data provided by Google Analytics for the period of July 1, 2021 to June 20, 2022.

h. Phone

A PRONTO Card can be purchased by phone by calling the PRONTO Support Center. In FY22, out of a total of 112,688 calls, 100,388, or 89.1% of calls, were received through the English call prompts and 12,300, or 10.1% of 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 PRONTO Support Center staff, likely about five (5) calls occur per year occur in other languages<sup>16</sup>.

i. Mobile Application

Through the MTS's mobile application (PRONTO), passengers can purchase stored value, monthly passes and special event passes. In the last year, 400,000 users used the PRONTO Mobile Application to purchase tickets. Data on which languages passengers are viewing the PRONTO Mobile Application in is not available at this time<sup>17</sup>.

6. Participation in public meetings

MTS Board of Directors and Executive Committee meetings generally occur monthly. MTS Public Security Committee, MTS Taxicab Advisory Committee, and Accessible Services Advisory Committee generally meet quarterly. The MTS Budget Development Committee and the MTS Audit Committee meet as necessary. As authorized, meetings are done either virtually or in-person. When meetings are done virtually, MTS uses a Zoom platform with closed captioning functions.

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 Meeting Clerks: about three (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 (1) 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

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<sup>16</sup> Provided by Director of Support Services in November 2022.

<sup>17</sup> Data was not available per Fare Systems Administrator on November 28, 2022.

that may have complaints, compliments, or general comments about MTS's service. For FY22, Information and Trip Planning Call Center had 193,354, or 93.3% of calls, through the English call prompts and 13,987 or 6.7% of calls % through the Spanish call prompts. For FY22, the Customer Service Call Center had 32,584, or 92.5% of calls, though the English call prompts, and 2,655, or 7.5% of 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 five (5) calls were received in other languages in FY22.

The Deputy 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>18</sup>.

MTS currently provides a front desk at its main administrative office (1255 Imperial Avenue, San Diego) for members of the public to call and for hiring and employment matters. Front desk receptionists are bilingual in English and Spanish.

The following general observations were provided by the receptionist at MTS's main administrative office: of about 75 interactions a day with members of the public, either via the phone or in person, about two (2) 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 or Spanish in the past year<sup>19</sup>.

#### 8. Passenger Support Representatives

Passenger Support Representatives, also known as Ambassadors, provide passenger assistance at fixed locations and at special events. MTS administered a survey regarding the frequency in which LEP persons come into contact with Passenger Support Representatives. Out of a total of 36 Passenger Support Representatives, 8 Passenger Support Representatives participated in the survey.

Table 12 shows the survey results from the Passenger Support Representatives.

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<sup>18</sup> Information provided by Deputy General Counsel for the period of November 2021 to November 2022.

<sup>19</sup> Information provided by Human Resource Assistant on December 13, 2022.

Table 12: Frequency of Contacts with LEP Riders – Passenger Support Representatives

Frequency of Contacts with LEP Riders – MTS Passenger Support Representatives									
<u>Language</u>	<u>LEP Population in Service Area</u>		<u>Total of 8 Passenger Support Representatives completed Survey</u>	<u>Daily</u>	<u>Weekly</u>	<u>Monthly</u>	<u>Yearly</u>	<u>Rarely</u>	<u>Unknown Frequency</u>
Spanish	114295	68.54%	8	8					
Chinese	4633	2.78%	7	3	1	2			1
French			7	2	2	2			1
Arabic	5091	3.05%	7		2			2	3
Japanese	1181	0.71%	6	3	2			1	
Filipino	1675	0.07%	6	2	2				1
German			6		1	3		1	1
Vietnamese	12276	7.36%	5	3				2	
Italian			5	2		2		1	
Korean	2855	1.71%	5	1	2	1		1	
Portuguese			5	1	1	2		1	
Tagalog	6303	3.78%	4	4					
Mandarin	1504	0.90%	4	2	1			1	
Lao	1327	0.81%	3	1				1	1
Russian	1695	1.02%	3		2				1
Cantonese	1024	0.05%	3		1				2
Unknown Language			3				1	1	1
Assyrian Neo-Aramaic	1591	0.95%	3						2
Sign language			2	1		1			
Farsi	1301	0.78%	2			1			2
Chaldean	1989	1.19%	2						1
Hindi			1		1				
Greek			1			1			

## 9. Ridership Survey

The 2022 Customer Satisfaction Survey found that about 33% of riders speak Spanish at home, with the next most frequent language as Tagalog (about 1%), and all other languages reported under 1% (the next closest was Chinese at about 0.8% of riders).

## 10. 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 1,519,515 users who reviewed MTS's Website ([www.sdmts.com](http://www.sdmts.com)), the information was viewed in the following languages: 92.82% in English, 5.32% in Spanish, 0.54% in Chinese, 0.26% in German, 0.25% in Japanese, 0.22% in French, 0.14% in Korean, 0.11% in Portuguese, 0.07% in Russian, 0.06% in Italian, 0.05% in Dutch, 0.02% in Turkish, 0.02% in Swedish, and 0.02% in Vietnamese<sup>20</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 MTS's websites 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 2022, 70% of people said they had no car available for transportation. Based on feedback MTS receives from the public, such as from community outreach meetings and at events at Transit Centers, many of MTS riders are dependent on transit for travel through the region<sup>21</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 interpreting services; hiring contractors to provide document translation; utilizing community volunteers to interpret information; utilizing the Google Translate widget on the MTS website; and paying for

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<sup>20</sup> Data provided by Google Analytics for the period of July 1, 2021 to June 30, 2022.

<sup>21</sup> Information provided by MTS Customer Satisfaction Survey, conducted by Redhill Group in April 2022.

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

##### **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 two (2) largest groups speak Vietnamese, representing 0.55%, and Tagalog, representing 0.28% 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 pages found that after English, predominantly Spanish was used (5.32% for MTS website, 7.29% for MTS PRONTO website, and 3.35% for EStore), and the next most used languages, albeit with significantly less frequency was Chinese (0.54% for MTS website, 0.81% for MTS PRONTO website, 0.57% for EStore). There is no clear top third language used to view MTS's website (may be Japanese or German, depending on the source).

Other than English, survey results from operators and security found that most interactions occur in Spanish. The next most frequented languages interactions with at least **daily, weekly or monthly** were:

- Chinese (32% of IAD bus operators, 30% of KMD bus operators, 14% of SBD bus operators, 15% of ECD bus operators, 0% of MTS Access vehicle operators, 8% of trolley operators, 28% of Code Compliance Inspectors, 29% of Transit System Security and 75% of Passenger Support Representatives);
- Filipino (27% of IAD bus operators, 21% of KMD bus operators, 29% of SBD bus operators, 24% of ECD bus operators, 0% of MTS Access vehicle operators, 8% of trolley operators, 28% of Code Compliance Inspectors, 29% of Transit System Security; and 50% of Passenger Support Representatives);
- Arabic (17% of IAD bus operators, 15% KMD bus operators, 18% of SBD bus operators, 64% of ECD bus operators<sup>22</sup>, 0% of MTS Access bus operators, 15% of trolley operators, 24% of Code Compliance Inspectors, 21% of Transit System Security and 25% of Passenger Support Representatives).

The 2022 Customer Satisfaction Survey found that about 33% of riders speak Spanish at home, with the next most frequented language as Tagalog (about 1%), with all other languages reported under 1% (the next closest was Chinese at about 0.8% of riders).

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

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<sup>22</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.

speaking languages other than Spanish, very rare and very infrequent interactions with other languages, 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 (3) languages to be Spanish, Vietnamese and Tagalog. Factor 2 found unanimously that Spanish was the top spoken language other than English.

The next most frequented language generally appears to be Chinese (although the 2022 Language Assistance Plan stated the second most frequented language after Spanish was Tagalog (1%)). LEP passengers speaking Chinese occurs significantly less in frequency when compared to Spanish. There is no clear top third language (German, Filipino 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:

- 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 area;
- 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 2022 Customer Satisfaction Survey, 61% of riders who speak a second language at home, which was approximately 36.5% of the total rider population surveyed, reported they can speak English "very well" (31%) or "well" (30%); and
- Some LEP persons may receive translation assistance from family or friends, and therefore do 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.

The PRONTO transit fare guide is designed to answer questions about PRONTO, MTS's new fare collection system. It is available on the MTS website, as a PDF, in both English and in Spanish (<https://www.sdmts.com/fares/pronto>). Additionally, the information provided on the PRONTO fare guide is available in text format and helpful graphics on the webpage, which can be translated via the Google Translation widget, into each LEP language. There are also video tutorials, which include closed captioning, on the MTS website that are available in both English and Spanish.

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 ADA Complementary Paratransit Service.

Table 13 below depicts the level of translation made available by MTS for vital written documents.

**Table 13: Vital Documents and Levels of Translation**

<b>Vital Documents and Level of Translation</b>						
Language	LEP Population in Service Area	Readily Available Translation for all Vital Documents	Readily Available Translation on MTS Website of Title VI Complaint Form	Readily Available Translation through Google Translate Widget on MTS Website of Title VI Notice, Title VI Process, Notice of Language Assistance, PRONTO Transit Fare Guide, and Application for Complementary Paratransit	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	Pending Available Resources, Upon Request Translation for all Vital Documents
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 <sup>23</sup>	X	X	X
Assyrian Neo-Aramaic	1,591		X	X	X	X
Mandarin	1,504		X <sup>24</sup>	X	X	X
Lao	1,347		X	X	X	X
Farsi	1,301		X <sup>25</sup>	X	X	X
Japanese	1,181		X	X	X	X
Cantonese	1,024		X <sup>26</sup>	X	X	X

<sup>23</sup> It is MTS's understanding that the Title VI Complaint Form currently translated into Tagalog may be used by a LEP person speaking Filipino. If that is not the case, please contact MTS Deputy General Counsel at [Samantha.Leslie@sdmts.com](mailto:Samantha.Leslie@sdmts.com) and MTS will review whether additional translation is necessary.

<sup>24</sup> It is MTS's understanding that the Title VI Complaint Form currently translated into Chinese may be used by a LEP person speaking Mandarin. If that is not the case, please contact MTS Deputy General Counsel at [Samantha.Leslie@sdmts.com](mailto:Samantha.Leslie@sdmts.com) and MTS will review whether additional translation is necessary.

<sup>25</sup> It is MTS's understanding that the Title VI Complaint Form currently translated into Persian may be used by a LEP person speaking Farsi. If that is not the case, please contact MTS Deputy General Counsel at [Samantha.Leslie@sdmts.com](mailto:Samantha.Leslie@sdmts.com) and MTS will review whether additional translation is necessary.

<sup>26</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 Deputy General Counsel at [Samantha.Leslie@sdmts.com](mailto:Samantha.Leslie@sdmts.com) and MTS will review whether 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 bus 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 are 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 (e.g. MTS Information and Trip Planning, MTS Customer Service, MTS Pronto Support 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 are 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 and other languages 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 14 summarizes the written and oral assistance measures MTS provides for the documents and information listed above in Section III (B).

Table 14: LEP Assistance Measure by Language

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

- b. in the lobby of the IAD administrative offices, used primarily as a reception for incoming MTS Access applicants, printed in English and Spanish;
  - c. at the MTS Transit Store, printed in English and Spanish;
  - d. on fixed-route buses and trolleys through Take One flyers (outlines important service and/or fare information critical to riders), posted approximately 3-4 times per year and printed in English and Spanish;
  - e. on Rider's Guides, printed in English and Spanish; and
  - f. on a decal placed within each paratransit vehicle, 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. In addition, notice regarding how to request translation services for public comment is provided on meeting agendas.
  - 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 (3) 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 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; requesting assistance from other colleagues that are bilingual; providing passenger the Customer Service phone number who may 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 three (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 three (3) years. The data used to identify LEP persons in MTS's service area is compiled by SANDAG using available data from ACS and/or other sources. If there is any updated data, it will be incorporated accordingly into MTS's LAP upon receipt from SANDAG.

The plan will be monitored using one (1) 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.

The last date in which this LAP was reviewed and updated was on **March 3, 2023**.