

APPENDIX B

Introduction

The Limited English Proficiency (LEP) Plan has been prepared to address Santa Clarita Transit’s responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin. Santa Clarita Transit will take reasonable steps to ensure that all persons have meaningful access to its programs, service and information, at no additional cost.

Executive Order 13166, titled *Improving Access to Services for Persons with Limited English Proficiency*, indicate that differing treatment based upon a person’s inability to speak, read, write or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its’ respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds, including Santa Clarita Transit.

Santa Clarita Transit’s goal is to take responsible steps to ensure meaningful access in benefits, services and information to LEP persons in the service area. All residents in this service area, to the fullest extent practicable, should be able to understand and participate in the transit services provided.

Plan Summary

Santa Clarita Transit has developed this *Limited English Proficiency* Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services provided by Santa Clarita Transit. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English.

This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required and how to notify LEP persons that assistance is available.

In order to prepare this plan, Santa Clarita Transit undertook the U.S. Department of Transportation’s (U.S. DOT) four-factor LEP analysis which considers the following factors:

1. The number and proportion of LEP persons served or encountered in the eligible service population.
2. The frequency with which LEP persons come in contact with Santa Clarita Transit programs, activities or services.
3. The nature and importance of services provided by Santa Clarita Transit to the LEP population.
4. The resources available to Santa Clarita Transit and overall cost to provide LEP assistance.

A summary of the results of Santa Clarita Transit’s four factor analysis is in the following section.

Four-Factor Analysis

1. The number and proportion of LEP persons served or encountered in the eligible service population.

Santa Clarita Transit’s service area covers the Santa Clarita Valley. This Valley consists of the City of Santa Clarita and various unincorporated areas of Los Angeles County. For planning purposes, Santa Clarita Transit reviewed the most current available data from the 2021 American Community Survey (ACS) Selected Social Characteristics in the United States 5-Year Estimates Data Profiles DP02 dataset within Santa Clarita.

The incorporated areas within Santa Clarita at the time of the 2021 ACS estimates had a total population of 211,118 over five years of age. In this population, 141,972, or 67.25 percent speak only English. Of the 32.75 percent that speak a language other than English, approximately 20,273 residents, or 29.32 percent, indicated that they speak English “less than very well.” Of the 20,273 residents that speak a language other than English, the majority (64.62 percent) are Spanish speakers. Of the residents that speak Spanish, 30.23 percent speak English less than “very well.”

Other languages spoken within the Santa Clarita Transit service area include: Indo-European (*German, Yiddish, Dutch, Swedish, Norwegian, French, Italian, Portuguese, Russian, Polish, Serbo-Croatian, Hindi, Gujarati, Punjabi, Urdu, Greek, Baltic and Iranian languages*), Asian and Pacific Island (*Chinese, Korean, Japanese, Vietnamese, Hmong, Khmer, Lao, Thai, Tagalong, Pilipino, Telugu, Tamil, Malayalam*) and All other languages (*everything not mentioned above*). The table below illustrates the number of LEP residents by language.

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Santa Clarita Language Spoken at Home and Ability to Speak English		
Label	Estimate	Percent of Total
Total	211,118	
Speak only English	141,972	67.25%
Language other than English	69,146	32.75%
Speak English less than "very well"	20,273	29.32%
Spanish	44,685	21.17%
Speak English less than "very well"	13,506	30.22%
Other Indo-European Languages	9,398	4.45%
Speak English less than "very well"	1,962	20.88%
Asian and Pacific Islander Languages	12,133	5.75%
Speak English less than "very well"	3,723	30.68%
Other languages	2,930	1.39%
Speak English less than "very well"	1,082	36.93%

Based on the demographics outlined above, the primary focus of the City’s efforts is on the Spanish speaking segment of the LEP population.

2. The frequency with which LEP persons come in contact with Santa Clarita Transit programs, activities or services.

Santa Clarita Transit serves LEP persons daily via our fixed route buses and paratransit services daily. The majority of our LEP persons are Spanish speakers. To date, the most frequent contact between LEP persons and our transit staff is with bus drivers. In October of 2020, an informal Coach Operator Survey was conducted by Santa Clarita Transit staff to determine the frequency with which coach operators come in contact with LEP persons and in which geographic segment of our service area. Findings indicate that Spanish is the most frequently encountered language by far, with operators reporting helping multiple Spanish-speaking patrons each day.

The Santa Clarita Transit customer call center is staffed with Spanish speaking personnel at all times. Call center staff is also trained to utilize translation services via a remote call center when necessary. Based on data from November 1, 2020 through April 30, 2023, the City’s transit call center received 143,645 transit phone calls, of which 15.45%, or 22,187 total calls, are from Spanish speaking customers.

According to the B16001 form from the 2016 Census ACS data, the majority of the LEP population resides in the Canyon Country (91351) and Newhall (91321) areas Santa Clarita Transit routes cover all areas of the Santa Clarita Valley. With 30-minute frequencies on all routes, areas with high and low LEP population are equally served.

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Based on our total ridership numbers for all local routes, the highest ridership by far comes from the routes that serve our LEP population of Canyon Country and Newhall.

ROUTE	FY2021-2022 Ridership Totals	Service Area
Route 1	85,166	Castaic & Valencia
Route 2	57,212	Val Verde & Valencia
Route 3	36,188	Saugus and Valencia
Route 4	84,227	Newhall, Valencia and Saugus
Route 5	194,902	Stevenson Ranch, Newhall, Valencia and Canyon Country
Route 6	310,919	Stevenson Ranch, Newhall, Valencia and Canyon Country
Route 7	36,519	Saugus and Valencia
Route 12	408,113	Valencia, Newhall and Canyon Country
Route 14	82,802	Newhall, Valencia and Saugus

3. The nature and importance of services provided by Santa Clarita Transit to the LEP population.

Santa Clarita Transit provides important transit services to the public through its fixed route and complimentary paratransit services. Santa Clarita Transit is the only major public transportation provider in the Santa Clarita Valley and provides Commuter bus service between the Santa Clarita Valley and the Los Angeles basin. Santa Clarita Transit provides Santa Clarita Valley residents, including LEP persons, transportation services for the purpose of commuting to work, shopping, recreational needs, personal errands, school and other services the public accesses frequently.

4. The resources available to Santa Clarita Transit and overall cost to provide LEP assistance.

Providing translation services to allow LEP populations to participate in the development of Santa Clarita Transit’s core planning and investment policies is a routine practice for Santa Clarita Transit. Santa Clarita Transit’s Customer Call Center, which manages customer comments by phone, mail, email and in-person, currently benefits from having four staff members who speak, read and write Spanish. The customer call center team also utilizes translation services provided by “Language Line” for customers who speak other languages. Spanish translated documents have included rider alerts posted on our buses and at bus stops, fare service change information, how to ride guides and current

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fare and pass information in the City service brochures. We currently provide a Spanish translator at each one of our community events and have developed Spanish language marketing campaigns promoting the benefits of public transportation.

Santa Clarita Transit provides Spanish language materials to our LEP population whenever possible. However, the cost to implement multiple-language (i.e., beyond English and Spanish) materials and translators are significantly high and not currently funded. Santa Clarita Transit staff is exploring lower cost options to expand access to these programs and materials for LEP residents within the service area. In 2013 the Santa Clarita Transit website was updated with Spanish pages and in 2019 staff inserted a clickable Google Translate tab which allows a reader to select their preferred language.

Based on the four-factor analysis, Santa Clarita Transit developed its LEP Plan as outlined in the following section.

Limited English Proficiency (LEP) Plan Outline

How Santa Clarita Transit and staff may identify an LEP person who needs language assistance:

1. Examine records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events or meetings.
2. Have a staff person greet participants as they arrive to Santa Clarita sponsored events. By informally engaging participants in conversation it is possible to gauge each attendee's ability to speak and understand English.
3. Consistently monitor the number of people that access the transit website in Spanish. And continue to update the site wherever needed.
4. If a vehicle operator encounters a customer in need of assistance in a language other than English, vehicle operators are instructed to try to obtain their contact information and give this information to their manager for follow-up. Dispatchers and call center staff are also instructed to obtain contact information from LEP persons they encounter either in person or over the phone and recording passenger's requests for language assistance in the customer service database.
5. Automated phone tree is available in English and in Spanish. Callers are given the opportunity to speak directly to a Spanish speaking staff person.

Language Assistance Measures

There are numerous language assistance measures available to LEP persons, including both oral and written language services. There are also various ways in which Santa Clarita Transit staff responds to LEP persons, whether in person, by telephone or in writing.

- Network with local human service organizations that provide services to LEP individuals and seek opportunities to provide information on Santa Clarita Transit programs and services.
- Provide a bilingual staff member at all community events and public hearings.
- Placement of statements in notices and publications that interpreter services are available for these meetings, with seven-day advance notice;
- Survey bus drivers and other front-line staff, like dispatchers and call center staff, on their experience concerning any contacts with LEP persons during the previous year;
- Post the Santa Clarita Transit Title VI Policy and LEP Plan on the agency website, www.santaclaritatransit.com ;

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- Upon request, provide group travel training to LEP persons with the assistance of bilingual staff;
- Include language “Spanish a plus” on bus driver recruitment flyers and onboard recruitment posters;
- When an interpreter is needed, for a language other than Spanish, in person or on the telephone, staff will attempt to access language assistance services from a professional translation service.

Vital Documents

All vital documents are translated into Spanish and posted online and where appropriate. Staff has identified the following documents to be vital as it relates to our passenger’s access to service and information:

- General service information and notices
- Title VI protection notifications and reporting procedures
- Public hearing notices
- Information regarding the availability of translation services
- Onboard and customer surveys

Note, although Spanish has been identified as the primary LEP language, translation services for all other identified LEP languages are available upon request.

Staff Training

The following training is provided to Santa Clarita City and contractor staff:

1. Information on the Santa Clarita Transit Title VI procedures and LEP responsibilities
2. Description of language assistance services offered to the public
3. Use of the Language Identification Flashcards
4. Documentation of language assistance requests
5. How to handle a potential Title VI/LEP complaint

Outreach Techniques

When staff prepares a document or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers and agendas will be printed in an alternative language based on the known LEP population. Interpreters will also be available as needed.

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Monitoring and Updating the LEP Plan

Santa Clarita Transit will update the LEP as required by the U.S. DOT. At minimum, the plan will be reviewed and updated every three years or when it is clear that higher concentrations of LEP individuals are present in the Santa Clarita Transit service area. Updates will include the following:

- The number of documented LEP person contacts encountered annually
- How the needs of LEP persons have been addressed
- Determination of the current LEP population in the service area
- Determination as to whether the need for translation services has changed
- Determine whether local language assistance programs have been effective and sufficient to meet the need
- Determine whether Santa Clarita Transit's financial resources are sufficient to fund language assistance resources needed
- Determine whether Santa Clarita Transit has fully complied with the goals of this LEP plan
- Determine whether complaints have been received concerning Santa Clarita Transit's failure to meet the needs of LEP individuals

Dissemination of the Santa Clarita Transit LEP Plan

A link to the Santa Clarita Transit LEP Plan and the Title VI Procedures is included on the Santa Clarita Transit website at www.santaclaritatransit.com. Any person or agency with internet access will be able to access and download the plan from the Santa Clarita Transit website. Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail or in person and shall be provided with a copy of the plan at no cost. LEP individuals may request copies of the plan in translation which Santa Clarita Transit will provide, if feasible.

Questions or comments regarding the LEP Plan may be submitted to:

Transit Manager
Santa Clarita Transit
28250 Constellation Road
Santa Clarita, CA 91355
Phone: (661) 295-6300
Fax: (661) 295-6393
Email: aaguilar@santa-clarita.com