



APPENDIX F

LANGUAGE ASSISTANCE PLAN

Language Assistance Plan 2025

Introduction

The Language Assistance Plan (LAP), a program supporting the needs of individuals of Limited English Proficiency (LEP) was developed in 2022 in the process of preparing StanRTA's initial Title VI Program. When properly implemented, the LAP will provide the tools to ensure that StanRTA's transit services are accessible to LEP individuals. Language for LEP individuals can be a barrier to accessing important benefits or services, understanding and exercising important rights, complying with applicable responsibilities, or understanding other information provided by federally funded programs and activities. As a recipient of FTA funds, StanRTA is obligated to reduce language barriers that can preclude meaningful access by LEP persons to transit services.

Title VI of the 1964 Civil Rights Act is one of two federal mandates that guarantee the provision of meaningful access to federally funded services for LEP individuals:

- Title VI of the 1964 Civil Rights Act prohibits federally-funded agencies from discriminating against individuals based on race, color, and national origin and includes meaningful access to LEP customers.
- President's Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" (August 11, 2000): Instructs federal agencies to improve access to services by mandating that any federally conducted or assisted programs of activities (e.g. recipients of federal funding) must provide meaningful access to LEP customers.

StanRTA's Title VI Program was prepared in accordance with FTA Circular 4702.1B, Title VI Requirements and Guidelines for Federal Transit Administration Recipients, October 1, 2012.

Four Factor Analysis

In order to ensure meaningful access to programs and services, StanRTA has used information obtained through the Four Factor Analysis to determine the specific language services that are appropriate to provide. The analysis reveals how the agency can improve communication with Limited English Proficient (LEP) individuals. Individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English, can be Limited English Proficient (LEP) and, therefore, are entitled to language assistance under Executive Order 13166 and Title VI of the Civil Rights Act of 1964.

This LEP Plan was developed to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access transit services. As defined by 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, StanRTA used the four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served by StanRTA
2. The frequency with which LEP persons come in contact with StanRTA's The S services
3. The nature and importance of services provided by The S to the LEP population
4. The interpretation services available to The S and the overall cost to provide LEP assistance.

A summary of the results of the four-factor analysis follows.

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 the recipient or grantee.

Transit staff reviewed the Census Bureau data language spoken at home and determined that among the 552,250 persons comprising the County's population, 65.8% speak English at home while 34 % of residents speak a language other than English at home. Spanish was identified as far and away the primary language spoken in the home other than English. Among those speaking a language other than English at home, 55.9%, identified themselves as speaking English "well" while 44.1% individuals, identified themselves as speaking English "less than well". Only 3.8% identified themselves as speaking little or no English.

In September 2025, StanRTA conducted its most recent onboard rider survey. The statistically valid data found that a majority of riders identified themselves as either Hispanic (45%) or white (40%). When queried about languages spoken in the home, respondents to the question, replied either English (90%) or Spanish (32%). Respondents were allowed to enter more than one response to this question. Riders who speak less commonly reported languages were asked to list them under the category other. Some of the languages mentioned included Arabic, Pashto, Farsi, Vietnamese and Punjabi, all below 1%.

Additionally, StanRTA cross-referenced its data with educational demographics data from the California Department of Education's *DataQuest* portal, of the school districts in the service area. The following table summarizing the research shows that among the county's school largest school districts, they identified LEP Populations that speak 17 languages at home. Of those languages there is only a numerically significant demand for language support services in our Spanish speaking LEP population.

Table 1. Students Not Fluent in English Proficient

| | Modesto City Elementary School District | Modesto City High School District | Total |
|-----------------------------------|--|--|--------------|
| Spanish | 4,678 | 2,316 | 6,994 |
| Khmer | 59 | 30 | 89 |
| Arabic | 78 | 62 | 140 |
| Hindi | 25 | 15 | 40 |
| Lao | 8 | 15 | 23 |
| Farsi (Persian) | 99 | 79 | 178 |
| Hmong | 10 | 3 | 13 |
| Vietnamese | 12 | 18 | 30 |
| Pashto | 49 | 42 | 91 |
| Punjabi | 2 | 2 | 4 |
| Filipino (Pilipino or Tagalog) | 2 | 8 | 10 |
| Assyrian | 8 | 21 | 29 |
| Cantonese | 1 | 1 | 2 |
| Portuguese | 1 | 3 | 4 |
| Mandarin | 2 | 3 | 5 |
| Russian | 8 | 12 | 20 |

FACTOR 2:

The frequency with which LEP persons come in contact with SRTA services.

StanRTA staff reviewed the frequency with which transit centers and office staff have, or could have, contact with LEP persons. This includes documenting phone inquiries, emails, or office visits. StanRTA serves LEP persons daily through The S fixed route and demand response services. The S customer service receives multiple requests daily for service information in Spanish both at the customer service windows and on the phone. Similarly, the ADA paratransit reservations system receives multiple daily information and reservation calls from passengers requiring support in Spanish. Customer service phone logs and LanguageLine records indicate just over 6% of the reservations are made in Spanish only conversations.

FACTOR 3:

The nature and importance of services provided by SRTA to the LEP population.

StanRTA provides important transit services to the public through its fixed route and paratransit services. StanRTA is the primary resource for transit dependent individuals for daily life tasks such as medical appointments, shopping, and commuting to school and work. This perception is validated as well through the 2025 fixed route rider survey and mapping data of the service area.

FACTOR 4:**The resources available and overall costs to provide LEP assistance.**

StanRTA currently provides the majority of its information in Spanish, including the Ride Guide, applications, information brochures, and all route brochures, and schedule information. Both StanRTA and its operator have bilingual staff providing verbal assistance to LEP individuals who may also have limited reading skills in their native language. This support is also available to all frontline employees. StanRTA utilizes the services of a certified translator for document translation services of its documents and for real time translation support at public meetings and events.

StanRTA is committed to making its services and programs available to LEP persons and recognizes the need to continue providing language services in Stanislaus County. StanRTA is committed to continuing the following practices:

- Providing customer services staff members who are bi-lingual and are trained to assist persons with limited English language proficiency. Customer service is the primary point of contact for individuals requiring language assistance.
- Providing bi-lingual supervisors and customer service representatives to assist Spanish speaking riders. These individuals are a source of important back-up support to frontline personnel. When speakers of language other than Spanish require assistance, personnel are trained to access the LanguageLine for communication assistance.
- In addition, StanRTA works with community organizations to determine other areas of need and coordinate with other agencies to reach any additional LEP populations.
- To support infrequent language support needs other than Spanish, StanRTA has arranged for LanguageLine services, which can provide real time phone translation services in over 200 languages.

Table 2. Sample documents available in safe harbor languages

| Document Title | Spanish Version | Comments |
|--|------------------------|--|
| Senior/Disabled Discount Card | Yes | Available in print and digital form |
| Demand Response services brochure | Yes | Available in print and digital formats |
| Fixed Route Brochures | Yes | Available in print and digital formats |
| Passenger Conduct Policy | Yes | Available in print and digital formats |
| Service Announcement Notices (Route/ Schedule /Fare, etc.) | Yes | Available in print and digital formats |
| Title VI Complaint Procedures | Yes | Available in print and digital formats |
| Customer Comment Form | Yes | Available in print and digitally (Ask the S) |
| Bus Head Signs | Yes | On bus |

