

Limited English Proficiency Access Plan
Southern California Regional Rail Authority
(Metrolink)
April 2019

Limited English Proficiency Access Plan

Federal definition of Limited English Proficiency(LEP) - It is the policy of the United States Department of Transportation not to discriminate against any person who is limited English proficient (LEP). In accordance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166, the Department will take reasonable steps to provide LEP persons meaningful access to its programs and activities. This commitment applies to all of the Department's federally conducted programs and activities.

SCRRA's Limited English Proficiency (LEP) Access Plan outlines how SCRRA will provide language assistance services, notify LEP persons about the availability of language assistance services, train employees to provide appropriate language assistance services and provide for the monitoring of its efforts and updating of the Access Plan. It is important to note that the Title VI Four Factor analysis which identifies the languages for inclusion in the plan is still undergoing an update and will be provided to the SCRRA board of directors as part of the full Title VI Report during their June 28, 2019 meeting. Additional languages are not anticipated to be included, however, the final report will contain all updates, including those received through public comment in the aforementioned report.

SCRRA's jurisdiction is within six Southern California counties: Los Angeles, Orange, Ventura, Riverside, San Bernardino and northern San Diego. Based on analysis conducted within the SCRRA service area, the following communities have been identified as having prominent low-income, minority and/or Limited English Proficiency (LEP) populations:

Los Angeles County

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|---------------------------|--------------------------|
| Baldwin Park | Montclair |
| Burbank | Northridge |
| Burbank Airport | Norwalk/Santa Fe Springs |
| Cal State LA | Palmdale |
| Chatsworth | Pomona North |
| El Monte | Downtown Pomona |
| Glendale | Sun Valley |
| Industry | Sylmar/San Fernando |
| Los Angeles Union Station | Van Nuys |
| Montebello/Commerce | Vincent Grade -Action |

Orange County

| | |
|----------------|-----------------------------|
| Anaheim | Laguna Niguel/Mission Viejo |
| Anaheim Canyon | Orange |
| Buena Park | Santa Ana |
| Irvine | Tustin |

Riverside County

Pedley
Riverside – La Sierra

San Bernardino County

East Ontario
Fontana

Ventura County

Oxnard

To prepare the Access Plan, SCRRA focuses on the most frequent points of potential contact and interactions between SCRRA employees and LEP individuals and communities. These points of contact and interactions include on Metrolink trains, by telephone (customer call center), in person (on the trains, at the platforms and stations or at public meetings) and via the Metrolink website. The potential methods of communication used for each point of contact determine the appropriate type of LEP assistance to employ.

How to provide language assistance service by interaction type:

- Telephone: The Metrolink customer call center provides multiple ways to communicate with LEP individuals, including:
 - The use of an automated system with choices of English or Spanish assistance, as Spanish is the alternative language with which the authority has the most frequent interaction.
 - Upon reaching the call center, operators have been trained to assist LEP individuals by connecting them with the Universal Language Line interpretation service. SCRRA will continue to fund the Universal Language Line as it is a primary means to ensure LEP language assistance.
- In-Person: There are primarily three types of in-person interactions: on board the trains; at the stations; and at public meetings/hearings. Regardless of the specific location, there are several ways in which SCRRA communicates with LEP individuals. These include or will include:
 - On Trains and at Stations: For other interactions on trains and at stations, if LEP individuals have questions, and a SCRRA employee does not speak the requested language, employees are trained to use their smart phones to either access the website for written translations or contact the customer service line at 1-800 371-5465 for translations either by automation (for Spanish), or live translator (via call center staff or the Universal Language Line for other languages).
 - Public Meetings: Public meetings/hearings include printed materials and oral translation in Spanish or other languages, as SCRRA employees staff determines necessary, based on anticipated LEP speaker participation. Additionally, with sufficient advance notice from a LEP requestor, oral and written translations are provided upon request.
- Website: Translation of vital documents (beneficiary notice, complaint form instructions and complaint form) in Spanish, Arabic, Armenian, Chinese (Simplified and Traditional Farsi, Korean, Japanese, Russian, Tagalog and Vietnamese already exist on the website. The website also provides a web link for contact information to reach the Customer Call Center in the ten languages discussed above. Clicking on the Customer Service tab provides LEP persons with the Customer Call Center. Representatives will connect LEP individuals with Universal Language Line assistance.

The website also provides language translation in 103 languages provided by Google Translate. In the alternate, through a written request, SCRRA will arrange for written translations of requested material.

Media and Marketing Campaigns: SCRRA is engaged in an active bi-lingual media and marketing campaigns, primarily with the Spanish-speaking community. Examples include new fare promotions, safety messages and other important Metrolink promotions are provided via mailings, newspaper placements, website content and radio announcements. SCRRA reaches 245 news agencies in its press distribution. Out of that, 15 news agencies (6.1%) are dedicated to non-English or LEP populations.

- Ticket Vending Machines: All Metrolink Ticket Vending Machines have an “Español” option on the home screen for Spanish-speaking riders to select so they can make their ticket selections in Spanish. There is also an audio option for vision-impaired Spanish-speaking riders.

Monitoring, Evaluation and Language Access Plan Updates

Through the acquisition of information on how language assistance is used, as well as additional information developed through Title VI Four Factor Analysis updates, SCRRA will continually evaluate the effectiveness of the Plan and look for additional ways to improve the accessibility of the services provided to LEP populations. Plan monitoring includes review of:

- The number of calls handled in English and Spanish by the automated customer call center line, the number of requests for English and Spanish assistance, and the number of calls, and the specific language requests that result in a transfer to a live operator on the Universal Language Line interpretation service.
- Sign-in sheets kept by SCRRA staff involved in community outreach efforts of the type of language assistance requested.
- Sign-in sheets kept by SCRRA staff involved in public hearings and workshops of language assistance requested before or during such meetings.
- Tracking by SCRRA Public Affairs of Metrolink-related news coverage, particularly as it relates to service or fare changes, by multilingual media outlets. Public Affairs staff also regularly updates multilingual media outlet distribution lists to ensure maximum coverage opportunities by such outlets.
- Tracking by SCRRA IT staff of the frequency with which unique visitors to the Metrolink website access the vital documents and other posted information provided in translated languages, such as the Strategic Plan survey.
- Tracking by SCRRA IT staff track of the frequency with which unique visitors to the Metrolink website home page click on the Google translation tool as well as the multilingual information web banner/link.

The above monitoring activities feed into each subsequent Title VI Four Factor Analysis and LEP Access Plan update. Each subsequent Four Factor Analysis serves to evaluate the current plan and to identify additional steps which may improve our internal efficiency while positively affecting the accessibility for LEP persons. This evaluation and update will occur at least once every three years.

Employee Training on Timely and Reasonable Language Assistance

As noted above under how SCRRA provides language assistance services, the Authority has attempted to simplify the interaction process for all of its employees by focusing on the ways in which staff members come into contact with LEP individuals. This process provides a convenient

and responsive program which is capable of maintaining a high level of accessibility for our Metrolink customers. To ensure the process works properly, staff members are trained to respond appropriately to their intended interaction point. As such, the following training techniques apply:

- All SCRRRA employees are provided access to training on Title VI. The training content includes:
 - Understanding the Title VI policy and LEP Plan
 - Explanation of the LEP language assistance services Metrolink offers
 - How to use the Universal Language Line interpretation service
 - How to access translation services via the Metrolink website;
 - Documenting language assistance requests; and
 - How to handle a Title VI and/or LEP complaint.
 - Referrals to Metrolink staff who will log language assist
 - How to document language assistance requests and other
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Materials Available in Specific Languages -

| Type of Information | Languages | Status |
|--|---|---------|
| General materials | Spanish | Ongoing |
| Website | 103 languages provided by Google Translate and the Customer Service telephone number to receive oral (or written) translation in 171 other languages. Additionally, beneficiary notices available in Spanish, Arabic, Armenian, Chinese, Farsi, Japanese, Korean, Russian, Tagalog and Vietnamese | Ongoing |
| Metrolink Timetables | 103 Languages | Ongoing |
| Public Notices | Spanish, Arabic, Armenian, Chinese, Farsi, Japanese, Korean, Russian, Tagalog, Vietnamese | Ongoing |
| Marketing Materials | Spanish | Ongoing |
| Universal Language Line | All LEP languages | Ongoing |
| Civil Rights Beneficiary Notice | Spanish, Arabic, Armenian, Chinese, Farsi, Japanese, Korean, Russian, Tagalog and Vietnamese | Ongoing |
| Civil Rights Complaint Instruction Form and Complaint Form | Spanish, Arabic, Armenian, Chinese, Farsi, Japanese, Korean, Russian, Tagalog and Vietnamese | Ongoing |

Any questions or comments regarding this plan should be provided as part of public comment outreach instructions.