

**Metropolitan Transportation Commission**  
**Policy Advisory Council Equity & Access Subcommittee**

June 12, 2019

Agenda Item 2

**Revised Plan for Special Language Services to  
Limited English Proficient (LEP) Populations**

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**Subject:** Revised Plan for Special Language Services to LEP Populations.

**Background:** Presidential Executive Order 13166 (August 2000) states that people who speak limited English should have meaningful access to federally conducted and federally funded programs and activities. It requires that all federal agencies identify any need for services to those with LEP, and develop and implement a system to provide those services so all persons can have meaningful access to services. Agencies such as the Metropolitan Transportation Commission (MTC) that receive federal funds are also subject to this requirement. Accordingly, in September 2010, the Commission adopted MTC's Plan for Special Language Services to LEP Populations (LAP-2010). The Language Assistance Plan (LAP)-2010 was updated, revised and approved by the Commission on May 2013.

MTC entered into an agreement with Civic Edge on April 2018 to assist with the analysis and outreach necessary to review and update MTC's current LAP. On May 2, 2019, MTC issued a news release and a series of display ads in various community papers informing the public that the draft version of the revised LAP ("*Draft Revised LAP-2019*") was available for review and public comment. The *Final Revised LAP-2019*, is available for public review in Spanish, Mandarin, Cantonese, and English. These documents are available on the internet at <https://mtc.ca.gov/about-mtc/public-participation/get-language-assistance>.

MTC received a total of two written comments (see Attachment B) on the *Draft Revised LAP-2019*. Comments on the *Draft Revised LAP-2019* indicated that MTC should update its policies to avoid overly technical terms and write in a style tailored to a general audience; and present languages in alphabetical order. The *Draft Revised LAP-2019* was not modified in response to the comments received.

Staff finalized the Revised LAP-2019 ("*2019 Plan*") and will continue to perform periodic checks of translated materials to ensure they are interpreted correctly, and monitor the effectiveness of the *2019 Plan*.

**Issues:** None.

**Recommendation:** None

**Attachments:** Attachment A: Plan for Special Language Services to LEP Populations-2019  
Attachment B: Summary of Comments and Responses to MTC's Draft Revised Plan for Special Language Services to Limited English Proficient (LEP) Populations

**Plan for Special Language Services to Limited English Proficient (LEP) Populations**

The Revised Plan for Special Language Services to Limited English Proficient (LEP) Populations is available online at

[https://mtc.ca.gov/sites/default/files/MTC\\_2019\\_Plan\\_for\\_Providing\\_Special\\_Language\\_Services\\_to\\_LEP\\_Population\\_-\\_Final\\_Draft.pdf](https://mtc.ca.gov/sites/default/files/MTC_2019_Plan_for_Providing_Special_Language_Services_to_LEP_Population_-_Final_Draft.pdf)

**Summary of Comments and Responses to  
MTC's Draft Revised Plan for Special Language Services to Limited English Proficient  
(LEP) Populations**

COMMENTS	RESPONSE
<p><b>#1 — E-mail comment</b> (Comment from: Betsy Megas)</p> <p>I haven't read your language assistance draft in detail, but it looks to me from the summary like you're aiming to provide services in a selection of the languages most commonly spoken here.</p> <p>I suggest you also make it a policy (whether in this document or elsewhere) to simplify your English, to make sure that the most public-facing parts are simple enough for people with limited English or limited literacy. There are many advantages to simplifying the English: -English is a lot easier for a non-native speaker to read, when it's simple, and not too legal or bureaucratic. -Native English speakers may have limited literacy or may have difficulty reading. This study finds that around 25% of Californians have low literacy, some with difficulty performing routine tasks:  <a href="https://nces.ed.gov/NAAL/pdf/state_summaries/California.pdf">https://nces.ed.gov/NAAL/pdf/state_summaries/California.pdf</a>          -Even fluent English readers have an easier time reading and using information when the language is simple, clear, and concise. -People speak a huge diversity of languages in the greater Bay Area, and even offering services and materials in the top dozen or more languages would fail to serve everybody. With some exceptions (e.g. Portuguese speakers may find Spanish easier English), people who speak other languages will try to use English. -Translations are messy, and even good ones may miss details. (I saw one VTA study of complete streets get translated and checked off in Spanish as a “complete study of streets.”)</p>	<p>This Plan is intended to detail the various ways MTC works to serve the needs of Bay Area residents who are limited English proficient. MTC provides translated web content and provides simple, concise instructions on how to request translation services, both on the web and at our meetings.</p> <p>The agency will continue to monitor the effectiveness of its LEP Plan and whether new documents, services, and/or activities need to be made accessible for LEP persons.</p>
<p><b>#2 — E-mail comment</b> (Comment from: Craig Yates)</p> <p>Excellent outreach, best languages presented in alphabetical order, so all languages people learn the meaning of respect present for all languages. Alphabetical order A-Z. Chinese, Spanish, Tagalog, so shows all languages are important not one is more important than the other.</p>	<p>Order of languages is determined by the frequency with which LEP population come in contact with the agency.</p>