

2020

NCTD Language Assistance Plan

NCTD 2020 Language Assistance Plan (LAP)

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EXECUTIVE SUMMARY

The following Language Assistance Plan (LAP) is based on a collaborative effort between the North County Transit District (NCTD), the Metropolitan Transit System (MTS), and the San Diego Association of Governments (SANDAG) to identify the language assistance needs for persons of Limited English Proficiency (LEP). Conducted in 2019, included is the development of the Four Factor Analysis as 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.
- **Factor 2**: The frequency with which LEP individuals come into contact with the program.
- **Factor 3**: The nature and importance of the program, activity, or service provided by the recipient to people's lives.
- **Factor 4**: The resources available to the recipient and costs.

Identification of LEP Individuals

Following Factor 1 United States Department of Transportation (US DOT) Guidance, multiple sources including the US Census Bureau, American Community Survey (ACS), US Department of Labor, California Department of Education, and the San Diego County Department of Mental Health were used to determine the number of LEP individuals in the county. According to these findings, over 59,000 people over the age of five (5) speak English "less than well" in the NCTD service area, accounting for 6.99 percent of the total population in the service area over the age of five (5).

Language Assistance Measures

Current language assistance measures are presented. Current language assistance measures were compiled by interviewing and surveying key staff who regularly work on outreach efforts and customer service. These measures include the means of written, oral, and customer service language assistance; resources and strategies for community outreach; interface at NCTD facilities and on NCTD vehicles; and public/press relations.

Training Staff

Following DOT guidance, NCTD staff training by NCTD's Civil Rights Officer will be implemented according to the Four Factor Analysis and this LAP. Specific training elements are discussed in this report.

Providing Notice to LEP Persons

Laid out within the LAP are the ways that NCTD provides notice to LEP persons. Additionally, due to this process, supplemental methods will be added. These are also detailed in this report.

Monitoring and Updating the LAP

Lastly, to ensure compliance and practical implementation by all agency staff, this LAP details how monitoring and updating will occur on a triennial basis.

I. NCTD BACKGROUND

The North San Diego County Transit Development Board (NSDCTDB) was created by California Senate Bill 802 on September 20, 1975. The Board was created to plan, construct and operate, directly or through a contractor, public transit systems in its area of jurisdiction.

On January 1, 2003, a new state law was enacted (SB 1703) that essentially transferred future transit planning, programming, development and construction to SANDAG, San Diego's regional planning agency. The NSDCTDB continued to operate the BREEZE, COASTER, and SPRINTER. In this new role, NCTD continues to provide integrated public transit service within the North San Diego County region.

On August 30, 2005, the North County Transit District Act was amended to rename the District to North County Transit District (NCTD), and this formal name change was effective January 1, 2006. NCTD's services are a vital part of San Diego's regional transportation network.

Service Area

NCTD provides more than 10.3 million passenger trips per year in North San Diego County. NCTD provides service over a 1,020 square mile area with a population of approximately 849,000 people. Included in the service area are the cities of Carlsbad, Del Mar, Encinitas, Escondido, Oceanside, San Marcos, Solana Beach, and Vista. The service area also includes areas of unincorporated North San Diego County, including Fallbrook.

The services provided by NCTD include BREEZE fixed route bus, FLEX deviated fixed route and on-demand routes, COASTER commuter rail, SPRINTER hybrid rail, and LIFT paratransit service. For fiscal year (FY) 2019, the BREEZE/FLEX services carried over 6.4 million annual passengers, COASTER commuter rail trains carried over 1.4 million annual passengers, while the SPRINTER light rail service carried over 2.9 million annual passengers. LIFT paratransit service carried over 168,000 passengers in FY 2019.

NCTD riders also have access to other regional transit systems and transportation services in San Diego County, Riverside County, and Orange County. These services include MTS, Riverside Transit Agency, Metrolink, and Amtrak.

II. PURPOSE

NCTD recognizes the importance of effective and accurate communication between its personnel and the community that they serve. Language barriers can impede effective and accurate communication in a variety of ways. Language barriers can sometimes inhibit or even prohibit individuals with LEP from accessing and/or understanding important rights, obligations, and services, or from communicating accurately and effectively in difficult situations. Ensuring maximum communication ability between NCTD personnel and all segments of the community serves the interest of both. *LEP* is a term used to describe people who do not speak English as their primary language and who also may have limited ability to read, write, or understand English.

Providing LEP persons with meaningful access to NCTD's services is important to NCTD. It is the intent of the District that the LAP helps to ensure equal access to transit and as it works together with the LEP community, to provide meaningful access to safe, convenient, reliable, and user-friendly transit services throughout NCTD's service area.

The purpose of this plan is to establish effective guidelines, consistent with Title VI of the Civil Rights Act of 1964, for NCTD personnel to follow when providing services to, or interacting with, individuals who are LEP.

III. TITLE VI POLICY STATEMENT SUMMARY

NCTD gives public notice of its policy to ensure full compliance with Title VI of the Civil Rights Act of 1964 and all related statues. Title VI requires that no person in the United States of America shall, on the grounds of race, color, or national origin, be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination, under any program or activity for which NCTD receives federal financial assistance. NCTD ensures that every effort will be made to prevent discrimination through the impacts of its programs, policies, and activities on minority and low-income populations. In addition, NCTD will take reasonable steps to provide meaningful access to services for persons with LEP.

NCTD has, as a normal part of doing business, committed to ensuring that publications intended for public outreach or public involvement, where appropriate, will be also offered in Spanish (NCTD's largest LEP population) and Vietnamese, Chinese, Tagalog, and Korean, upon request. NCTD will continue to monitor requirements and add other languages when they meet the required LEP threshold.

IV. NCTD LEP SERVICES STATEMENT

NCTD strives to provide effective, efficient, and equitable service to all individuals regardless of their ability to read, write, speak, or understand English. Service delivery options (translation of publication, oral language assistance, etc.) are available to all LEP individuals, enabling them to communicate effectively with NCTD in person, over the phone, in writing, and through electronic media.

On August 11, 2000, President Clinton signed Executive Order 13166, *Improving Access to Services for Persons with Limited English Proficiency*. It directs federal agencies to examine the services they provide and develop and implement a system by which LEP persons can meaningfully access those services. Federal agencies were instructed to publish guidance for their respective recipients in order to assist them with their obligations to LEP persons under Title VI.

On December 14, 2005, the DOT published revised guidance for its recipients on the Implementation of Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency". *LEP* is a term used to describe people who do not speak English as their primary language and who also may have limited ability to read, write, or understand English. The foregoing Executive Order states that Title VI and its implementing regulations require that DOT recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are LEP and that recipients should use the DOT LEP Guidance to determine how best to comply with statutory and regulatory obligations to provide meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are LEP.

The Federal Transit Administration (FTA) references the DOT LEP guidance in Circular 4702.1B, *Title VI Requirements and Guidelines for Federal Transit Administration Recipients*, which was finalized on October 1, 2012. Chapter III Part 9 of this Circular reiterates the requirement to take responsible steps to ensure meaningful access to benefits, services, and information for LEP persons and suggests that FTA recipients and sub-recipients develop a language assistance plan consistent with the provisions of Section VII of the DOT LEP Guidance. The FTA Office of Civil Rights also released a handbook in 2007 for transit providers (*Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons* [FTA 2007]) to give technical assistance for the implementation of the DOT LEP guidance.

Transit agencies that provide language assistance to persons with LEP in a competent and effective manner will help ensure that their services are safe, reliable, convenient, and accessible to those persons. These efforts may attract riders who would otherwise be excluded from participating in the service because of language barriers and, ideally, will encourage riders to continue using the system after they are proficient in English and/or have more transportation options. Catering to LEP persons may also help increase and retain ridership among the agency's broader immigrant communities in two (2) important ways: 1) agencies that reach out to recent immigrant populations in order to conduct a needs assessment and prepare a language implementation plan (pursuant to the DOT LEP Guidance) will send a positive message to these persons that their business is valued; and 2) community outreach designed to identify appropriate language assistance measures can also assist the agency in identifying the transportation needs of immigrant and linguistically isolated populations and ensuring that an agency's transit routes, hours, and days of service, and other service parameters are responsive to the needs of these populations. Additionally, transit agencies that conduct outreach to LEP persons can increase their potential for recruiting bilingual employees to better serve the needs of the community. In summary, serving the needs of LEP persons is not only a good business decision but also fulfills the mission of the transit agency to serve the public.

NCTD supports the goals of the DOT LEP Guidance to provide meaningful access to its services by LEP persons. NCTD has resources to provide oral and written language assistance services to LEP individuals. Each of the mentioned resources were used to guide the required Four Factor Analysis performed by SANDAG and this LAP.

NCTD has developed this LAP to address the needs of the LEP populations in the NCTD service area. Following DOT LEP Guidance, included in this report are the following five sections:

- 1. Identifying LEP individuals who need language assistance in NCTD's service area as prescribed in SANDAG's Four Factor Analysis
- 2. Providing language assistance measures
- 3. Training staff
- 4. Providing notice to LEP persons
- 5. Monitoring and updating the Plan

V. FOUR FACTOR ANALYSIS

This section documents the research done to identify LEP populations in the NCTD service area. For the purposes of this publication, individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English are considered LEP.

A. Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the transit service.

Factor 1 Analysis findings indicate that 6.6 percent of the population within the NCTD service area speaks English "less than well". The top five (5) languages spoken other than English are Spanish (5.41 percent of the NCTD service area population), Vietnamese (0.23 percent), Chinese (0.18 percent), Tagalog (0.14 percent), and Korean (0.11 percent). Combined, these five (5) languages include 91.9 percent of the LEP population in the NCTD service area.

There were several key findings revealed in the analysis of the data:

- Approximately 30 percent of persons in the NCTD service area speak a language other than English at home.
- 6.6 percent speak English less than "well" (includes those that speak English "not well" and "not at all");
- Spanish is the second most predominant language, after English, spoken in the NCTD service area:
- Of the languages spoken in the region, Table 1 shows the languages with over 1,000 LEP speakers;

Table 1: LEP Speakers by Language in NCTD Jurisdiction

Language	LEP Population	Percent of All LEP Speakers	Percent of Total Population (Age 5+)
Spanish	50,135	81.93%	5.41%
Vietnamese	2,147	3.51%	0.23%
Chinese	1,680	2.75%	0.18%
Tagalog	1,291	2.11%	0.14%
Korean	1,003	1.64%	0.11%

Source: U.S. Census Bureau, American Community Survey 5-Year Public Use Microdata Sample (PUMS) 2013-2017

LEP POPULATION ANALYSIS

The DOT describes LEP as having a limited ability to read, write, speak or understand English. The DOT and FTA (in both the LEP guidance and Title VI Circular), define this population as people who reported that they speak English "not well" or "not at all." Table 2 shows this analysis for the NCTD service area results in an overall LEP population of 7 percent of persons age five (5) years and older.

Table 2: English Proficiency for the NCTD Service Area

County	Total Population Age 5 and Over	Speaks English Only	Speaks English "Well" or "Very Well"	Less Than "Well"	Percentage Less than "Well"
NCTD Service Area	855,725	596,389	199,485	59,851	6.99%

Source: U.S. Census Bureau, American Community Survey (ACS) 5-Year Estimates 2013-2017, Table B16004

The ACS data also includes information on languages spoken for 39 different language groups (but not by ability to speak English as is available in the ACS data). Table 3 shows the top ten non-English languages spoken at home in the San Diego region between 2013-2017 among the total population ages five (5) and older (including both LEP and non-LEP populations). While there were respondents from all 39 language groups, Spanish, Tagalog, Vietnamese, Chinese, and Korean were the primary languages.

Table 3: Languages Spoken at Home in the NCTD Service Area

Language	Language Spoken at Home for the Population 5 and Over	Percent of Total Population
Spanish	202,656	23.68%
Tagalog	11,292	1.32%
Vietnamese	5,957	0.7%
Chinese (incl. Mandarin and Cantonese)	5,512	0.64%
Russian, Polish, or other Slavic lang.	4,039	0.47%
German	3,582	0.42%
French, Haitian, or Cajun	2,884	0.34%
Korean	2,559	0.30%
Arabic	1,578	0.18%
All Other Languages	19,277	2.25%

Source: U.S. Census Bureau, American Community Survey (ACS) 5-Year Estimates 2013-2017, Table C16001

Figure 1 below shows the LEP Census Tracts using PUMA data. The map illustrates the Census Tracts where the proportion of the population speaking English "less than well" is greater than 6.6 percent, the service area average. Figure 2 shows the Census Tracts where the proportion of LEP Spanish speaking population is greater than 5.41 percent, the service area average. Figure 3 where the proportion of LEP Vietnamese speaking population is greater than 0.23 percent. Figure 4 for Chinese where the proportion is greater than 0.18 percent. Figure 5 for Tagalog where the proportion is greater than 0.14 percent. Figure 5 for Korean where the population is greater than 0.11 percent.

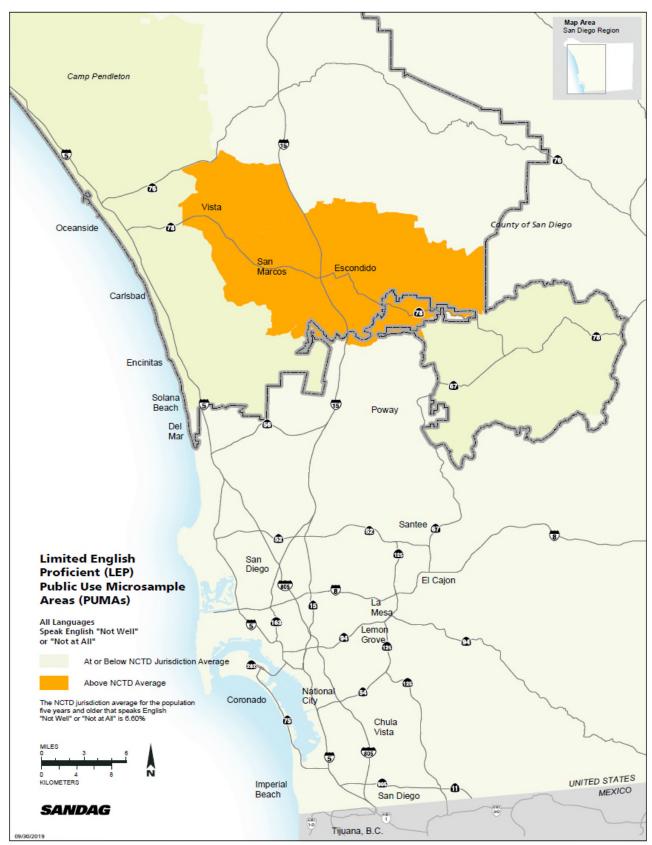


Figure 1 – Total LEP Population

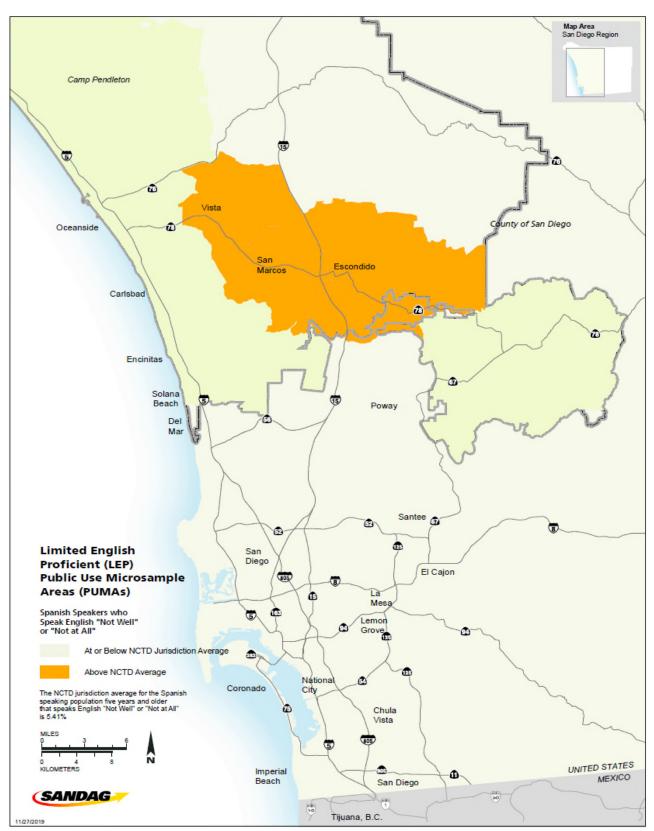


Figure 2 – Spanish LEP Population

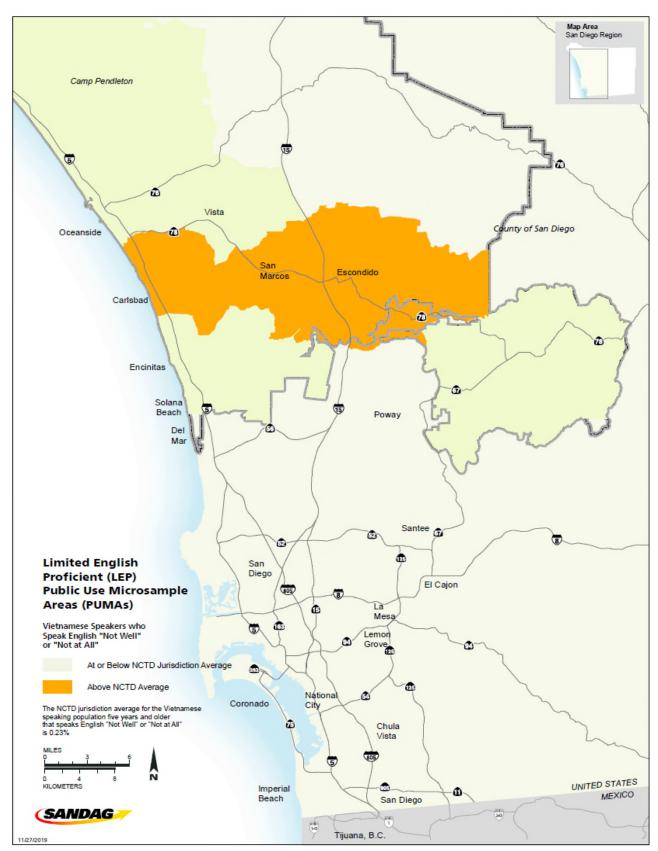


Figure 3 – Vietnamese LEP Population

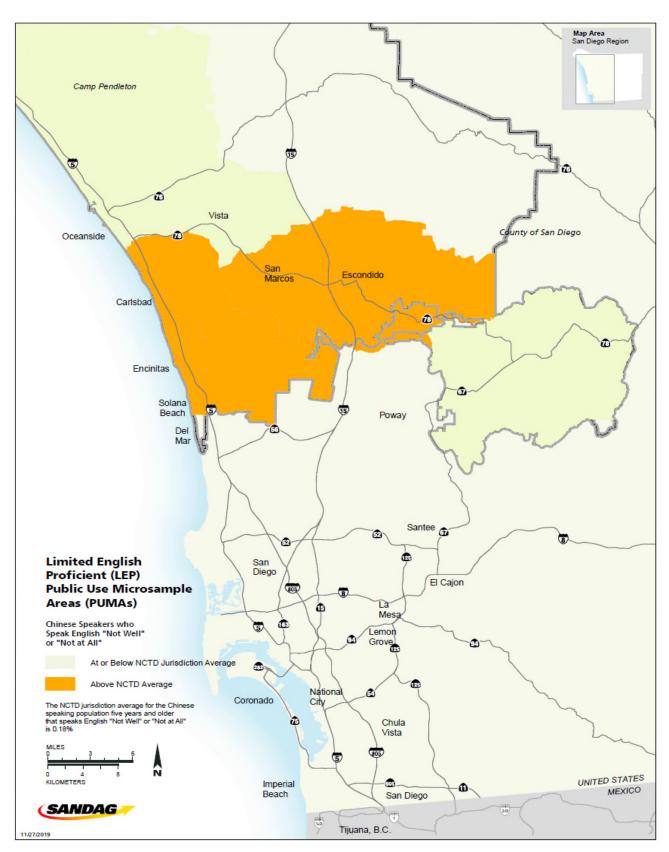


Figure 4 – Chinese LEP Population

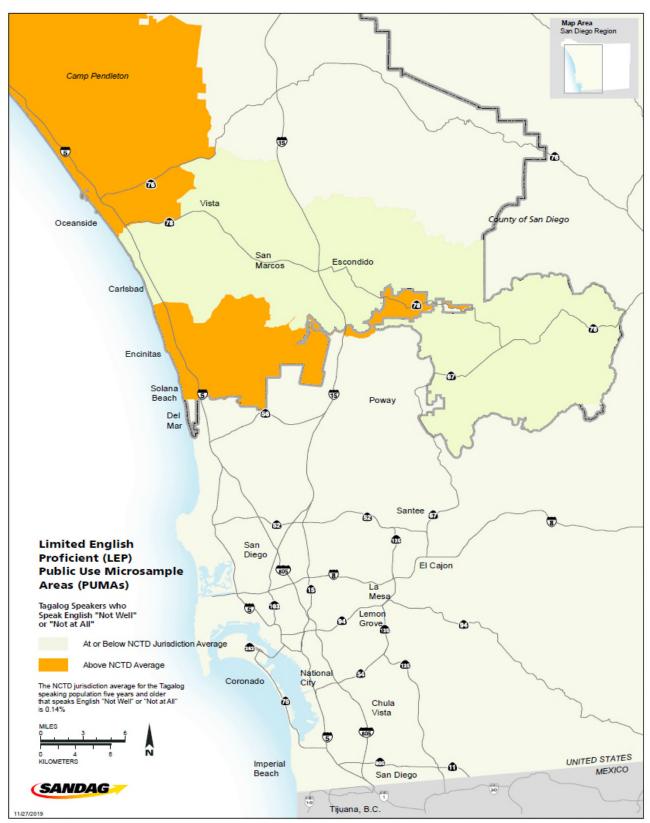


Figure 5 – Tagalog LEP Population

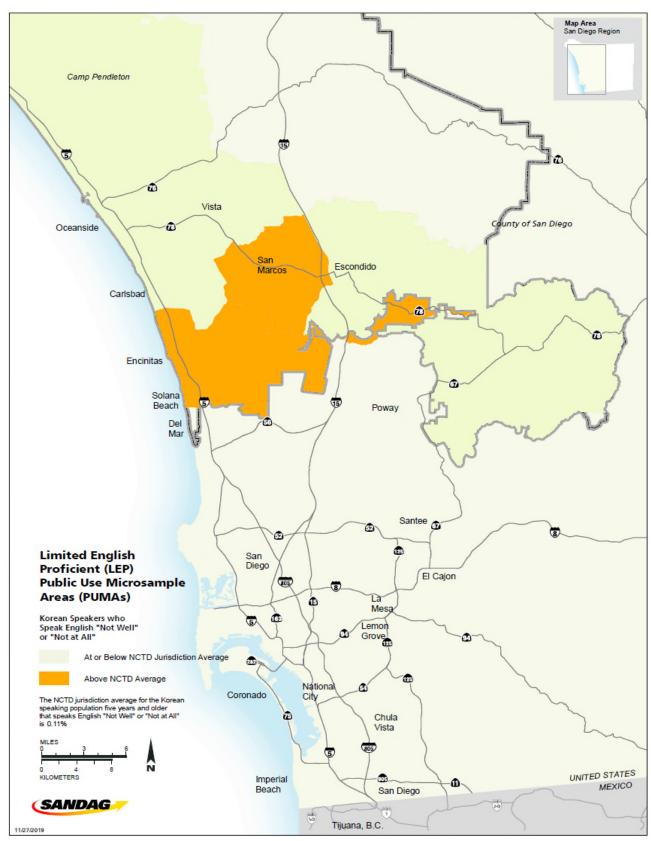


Figure 6 – Korean LEP Population

B. Factor 2: The frequency with which LEP individuals come in contact with a program, activity, or service of NCTD

In October 2019, NCTD distributed an anonymous survey to key program areas and assessed major points of contact with the public. This included NCTD's bus services (BREEZE Fixed Route, FLEX On-Demand, and LIFT Complementary Paratransit), NCTD's rail services (COASTER Commuter Rail and SPRINTER Hybrid Rail), customer service, purchasing of passes and tickets, participation in public meetings, and use NCTD's website. The results of these surveys are discussed below.

1. BREEZE, FLEX, and LIFT Bus Service

NCTD provides three (3) types of bus services, BREEZE fixed route, FLEX, and LIFT paratransit. BREEZE fixed route's service area comprises of over 1,020 square miles with 30 BREEZE routes. NCTD FLEX has three (3) different service models: on-demand, deviated fixed-route, and point-deviated fixed-route. FLEX on-demand routes take passengers anywhere within the FLEX zone. FLEX deviated fixed-route service has a set schedule and route but can deviate from the route up to 3/4 of a mile to pick-up or drop-off customers. FLEX point-deviated fixed-route has a set schedule and can deviate to certain points along the route. LIFT complementary paratransit service is provided to eligible individuals with disabilities who cannot board, ride, or navigate accessible fixed-route bus or train service because of their disabilities. Eligible individuals are those whose disabilities prevent them from using a NCTD lift-equipped bus or an accessible rail system. Eligibility certification for LIFT paratransit service consists of a completed application and a health care provider form.

Out of approximately 300 contracted BREEZE, FLEX, and LIFT employees, 37 employees participated in the survey (see Table 4 – BREEZE, FLEX, and LIFT Bus Service LEP Survey Results). Based upon the results of the survey, the following were the percentage of LEP languages commonly encountered by BREEZE, FLEX, and LIFT bus operators: Spanish (95%), Arabic (14%), Vietnamese (14%), German (11%), Chinese-Cantonese (8%), Chinese-Mandarin (8%), Russian (8%), French (5%), Japanese (5%), Korean (5%), Tagalog (5%), Dutch (1%), Italian (3%), Persian (3%), and Polish (3%).

i. Eligibility Process for LIFT

1. Application

LIFT paratransit applications are available on paper in English and Spanish. LIFT paratransit applications are also available in over 100 languages online through Google Translation. When LIFT paratransit applications are received in a language other than English or Spanish, correspondence with the applicant is provided in that language using bilingual in-house staff or contracted translation and interpretation services.

NCTD does not maintain data on the frequency in which LEP LIFT paratransit applicants come into contact with NCTD through the LIFT paratransit application process. However, the following general observation were provided by ADARide, NCTD's paratransit eligibility

certification contractor: Between October 1, 2018 through September 30, 2019, 1341 LIFT paratransit applications were received. Google Translate metrics showed that Google Translate was utilized 127 times to view paratransit eligibility information in a language other than English, with the majority being viewed in Spanish. No LIFT paratransit applications were requested to be translated into a language other than English and only a few applicants had questions regarding the LIFT paratransit application that required the use a Spanish interpreter.

2. In-Person Assessments

NCTD conducts in-person assessments following the receipt of a LIFT paratransit application. NCTD does not maintain data on the frequency in which NCTD comes into contact with LEP LIFT paratransit applicants. However, the following general observations were provided by ADARide: Between October 1, 2018 through September 30, 2019, NCTD conducted 353 in-person assessments with no requests for an interpreter to be present; Of the 353 in-person assessments, approximately 12 were conducted in a language other than English by a companion or personal care attendant; Of the 12 in-person assessment conducted in a language other than English, nine (9) were conducted in Spanish, one (1) in French, one (1) in Mandarin, and one (1) in Tagalog.

3. Appeals

LIFT paratransit applicants who were denied eligibility may request an appeal to NCTD's Appeals Review Committee. LIFT paratransit eligibility appeals are provided in the language of the appellant. No data is maintained on how frequent LEP passengers come into contact with LIFT through the LIFT paratransit eligibility appeals process. However, the following general observations were provided by the Manager of Paratransit and Mobility Services: Between October 1, 2018 through September 30, 2019, there were three (3) requests for an appeal; Of the three (3) requests for a LIFT eligibility appeal, all three were conducted in English.

ii. Reservations for LIFT

To reserve a trip, eligible customers must call the LIFT Reservation line at least one day prior to the day of their trip. Customers may schedule rides up to seven (7) days in advance. LIFT reservations are taken seven days a week from 8 a.m. to 5 p.m. Data is not maintained on the frequency in which LEP LIFT customers utilize NCTD's LIFT reservation line. However, the following general observations were provided by the Manager of Paratransit and Mobility Services: LIFT reservation staff are bilingual in both English and Spanish; Approximately 120,000 LIFT reservations were made between October 1, 2018 through September 30, 2019. Of the reservations made, 97% of reservations were made in English, 3% in Spanish, and no reservations were made in a language other than English or Spanish.

2. COASTER and SPRINTER Service

NCTD provides two (2) types of rail service, COASTER commuter rail and SPRINTER hybrid rail. COASTER provides commuter rail service along 41 miles of track north and south between Oceanside and downtown San Diego. SPRINTER provides hybrid rail service along 22 miles of track east and west between Oceanside and Escondido.

Out of approximately 27 Bombardier COASTER and SPRINTER rail operators, 12 employees participated in the survey (see Table 5 – COASTER and SPRINTER LEP Survey Results). Based upon the results of the survey, the following were the percentage of LEP languages commonly encountered by COASTER and SPRINTER rail operators: Spanish (100%), Chinese-Mandarin (33%), Chinese-Cantonese (25%), Japanese (25%), Korean (25%), Vietnamese (17%), Arabic (8%), Russian (8%), and Tagalog (8%).

3. NCTD Customer Service Interactions

NCTD Customer Service provides the public with information on services, routes, schedules, fare as well as taking complaints, comments, and concerns.

NCTD does not maintain data on the frequency in which Customer Service comes into contact with LEP customers. However, the following general observations were provided by analyzing the anonymous Customer Service LEP Survey results and through the Customer Service Manage: Out of approximately 14 Customer Service Staff, 12 employees participated in the survey (see Table 6 – NCTD Customer Service LEP Survey Results). Based upon the results of the survey, the following were the percentage of LEP languages commonly encountered by Customer Service staff: Spanish (100%), Chinese-Mandarin (33%), Chinese-Cantonese (17%), Tagalog (17%), French (8%), Japanese (8%), Korean (8%), and Vietnamese (8%); Between October 1, 2018 through September 30, 2019, Customer Service received 63,255 calls; Of the calls received, Customer Service utilized telephonic interpretation services once for Korean and once for Japanese.

LEP individuals can also come into contact with NCTD at its reception desk at the General Administrative Office (GAO). No data is maintained on the frequency in which LEP individuals come into contact with the reception desk at GAO. However, the following general observations were provided by the GAO receptionist: Out of approximately 25 customer interactions per week, approximately 3-4 are with Spanish speaking individuals and approximately 1-2 interactions per month with LEP individuals who speak a language other than English or Spanish; Of the interactions with LEP individuals who speak a language other than English or Spanish, only once has the GAO receptionist had to utilize telephonic interpretation services; All other interactions were with LEP individuals who had a limited ability to read, write, speak or understand English and who did not need interpretation services or have brought their own interpreter.

Additionally, LEP individuals can also come into contact with the Civil Rights Officer through a complaint of discrimination. The Civil Rights Officer provided the following information: Between October 1, 2018 through September 30, 2019, the Civil Rights Officer received 48

complaints; Of the complaints received, the Civil Rights Officer has spoken with Spanish speaking LEP individuals three (3) times through telephonic interpretation services and received only one (1) discrimination complaint form from a complainant in Spanish; The Civil Rights Officer has not had received a discrimination complaint in a language other than English or Spanish.

4. Purchase of Passes and Tickets

LEP individuals can come into contact with NCTD when purchasing a pass or a ticket. Passengers can purchase single ride fares, day passes, and monthly passes through ticket vending machines (TVMs), in-person at NCTD Customer Service Centers, bus farebox, mobile application (i.e., Compass Card), participating retail outlets, through other agencies or organizations (i.e., San Diego Metropolitan Transit System, Schools, and Social Service Agencies), and at special events.

Spanish speaking LEP individuals can utilize Ticket Vending Machines (TVMs) to purchase day passes and tickets for the SPRINTER and COASTER. TVMs are located at all SPRINTER and COASTER platforms and outside the Customer Service Office at Oceanside Transit Center. TVMs provide passengers with visual and audio prompts that can be displayed in either English or Spanish. All other LEP individuals can contact the Customer Service phone number that is provided on all TVMs for passengers who have questions or issues regarding the TVM to receive assistance in their language. Data is not maintained on how often LEP passengers use TVMs.

LEP individuals can also utilize electronic fareboxes on all of NCTD's buses to purchase fare. The electronic fareboxes accept coins, cash and valid Compass Cards. LEP passengers who have general questions or questions on how to use the bus farebox can ask the bus operator. Many bus operators are bilingual in English and Spanish or other languages. For bus operators who are not bilingual, the bus operators are trained to refer Spanish speaking LEP individuals to the Spanish section of the Rider's Guide, point to the visual decal on the farebox, or call dispatch for assistance. No data is maintained on how often LEP individuals use bus fareboxes.

LEP individuals can also utilize NCTD's mobile application (Compass Cloud) to purchase one day and monthly passes. Compass Cloud is a mobile application that is shared with the San Diego Metropolitan Transit System (MTS). Based on data provided by MTS, there were 283,309 ticket purchases through Compass Cloud between August 1, 2018 to August 1, 2019. Of the languages used to review the information in Compass Cloud, 91.27% were English, 3.75% were Spanish, 1.81% were Chinese, 0.41% were Korean, 0.29% were German, 0.13% were Portuguese, and 0.10% were French.

Additionally, LEP individuals can purchase day passes and monthly passes in-person at Customer Service Centers. Many Customer Service staff are bilingual in English and Spanish or other languages. For Customer Service staff who are not bilingual, the Customer Service staff are trained to utilize language assistance resources such as the "I Speak" language identification form, NCTD's Employee Language List, or telephonic interpretation services.

No data is maintained on how often LEP individuals use Customer Service Centers to purchase fare. However, the following general observations were provided by the Manager of Customer Service: Customer service sells approximately 2,987 day passes, monthly passes, and compass cards per month; Of the passes and compass cards sold, the following are the estimated percentages of purchases by LEP customers: English (71%), Spanish (28%), Tagalog (0.07%), Vietnamese (0.9%), Chinese (0%), and Korean (0%).

Lastly, LEP individuals can purchase day and monthly passes at participating retail outlets, through other agencies or organizations (i.e., San Diego Metropolitan Transit System, Schools, and Social Service Agencies), and at special events. No data or general observations are maintained on how often LEP individuals utilize these avenues to purchase day and monthly passes. However, many retail outlets and other agencies or organizations have staff that are bilingual in English and Spanish or other languages that are available to assist LEP individuals. Additionally, LEP individuals can always contact NCTD Customer Service to be able to receive information in their language should they have any questions about purchasing day or monthly passes at any of the locations noted above.

5. Participation in Public Meetings

NCTD hosts multiple public meetings on an annual basis. These meetings include a monthly Board of Director's meeting, an Executive Committee Meeting, a Marketing, Service Planning, and Business Development (MSPBD) Committee Meeting, and a Performance, Administration, and Finance Committee Meeting. Data is not maintained regarding the frequency with which LEP individuals come into contact with NCTD during these public meetings. However, the following general observations were provided by NCTD's Clerk of the Board: No public commenters have made comments during the Board of Directors meeting or any other committee meeting in a language other than English in the last year; No translation requests have been made in the last year for information in a language other than English.

All other public meetings hosted by NCTD are generally staffed with an employee who is bilingual in English and Spanish depending upon the type of event that is being hosted and its location. Upon request, NCTD will provide interpreters for languages other than English and Spanish. No data is maintained on the frequency with which LEP individuals come into contact with NCTD during these meetings. However, NCTD has not had a request for an interpreter in a language other than Spanish.

6. Use of NCTD's Website

NCTD's website, GoNCTD.com, provides the public with general information including, but not limited to, services, routes, schedules, fares, Rider's Guide, and service alerts. In April 2019, NCTD launched a new redesigned and reformatted website to allow for an intuitive design that allows users to promptly find the information they need. Prior to the launch of the new website, NCTD invited the public to review the website and provide feedback via a survey to make changes to support the launch of the upgraded website. NCTD received no feedback

from the public regarding making information on the website available in a language other than English.

Data is not available on the use of NCTD's website in languages other than English prior to the new website launch in April 2019. However, Google Analytics data is available on languages used on NCTD's website from April 2019 through December 2019. Between April 2019 through December 2019, a total of 638,830 users have accessed NCTD's website. Of the users who accessed NCTD's website, the following are the percentages of views in a particular language: English (96.8%), Spanish (1.4%), Chinese (0.3%), Japanese (0.3%), German (0.2%), French (0.1%), Korean (0.1%), Portuguese (0.06%), Russian (0.06%), and Italian (0.04%).

Table 4: BREEZE, LIFT, and FLEX Bus Service LEP Survey Results

Mode	What Area of N. San Diego	# of Daily Riders/Members	# of Daily LEP Riders/Members	LEP Languages Commonly Encountered	How often LEP/Week
BREEZE	Oceanside, Vista, Carlsbad, Encinitas, Solana Beach, Del Mar, La Jolla	251-300	< 10	Spanish	Rarely
BREEZE	Oceanside, Carlsbad, Fallbrook	101-150	51-100	Spanish	A few times per day
BREEZE	Oceanside, Carlsbad, Camp Pendleton	10-50	NOT ANSWERED	NOT ANSWERED	NOT ANSWERED
BREEZE	Oceanside, Vista, Carlsbad, Encinitas, Solana Beach, Del Mar, Fallbrook, Bonsall	101-150	10-50	Spanish	A few times per month
BREEZE	Oceanside, Vista, Carlsbad, Encinitas, Fallbrook	51-100	10-50	Arabic, Chinese (Cantonese), Dutch, Japanese, Korean, Russian, Spanish, Vietnamese	A few times per day
BREEZE	Oceanside, Vista, Carlsbad, Encinitas	51-100	10-50	German, Chinese (Mandarin), Japanese, Spanish,	Multiple times per day
BREEZE	Oceanside, Vista, Carlsbad, Encinitas, Solana Beach, Del Mar, Camp Pendleton	201-250	10-50	Arabic, Chinese (Cantonese), Chinese (Mandarin), Russian, Spanish	Multiple times per day
BREEZE	Oceanside, Vista, Carlsbad, Encinitas, Solana Beach, Del Mar, Camp Pendleton, Fallbrook, Bonsall	551-600	401-450	Spanish	A few times per day
BREEZE	Vista, San Marcos, Escondido, Carlsbad, Encinitas, Solana Beach, Pala, Pauma Valley, Valley Center	501-550	10-50	Spanish	A few times per day
BREEZE	Vista, San Marcos, Escondido, Pala, Pauma Valley, Valley Center	151-200	51-100	Spanish	Multiple times per day
BREEZE	Vista, San Marcos, Escondido, Encinitas, Solana Beach	551-600	101-150	Spanish	A few times per day
BREEZE	Oceanside, Vista, San Marcos, Escondido, Carlsbad, Encinitas, Solana Beach, Del Mar, Pala, Pauma Valley, Valley Center	201-250	51-100	Spanish	Multiple times per day
BREEZE	Vista, San Marcos, Escondido, Encinitas, Solana Beach	951-1000	Less than 10	German, Spanish, Tagalog	A few times per week
BREEZE	Oceanside, Vista, San Marcos, Escondido, Pala, Valley Center, Ramona	201-250	101-150	Spanish	Multiple times per day
BREEZE	Oceanside, Vista, San Marcos, Escondido, Encinitas, Solana Beach, Pala, Pauma Valley, Valley Center	201-250	101-150	Arabic, French, German, Italian, Spanish, Tagalog, Vietnamese	Multiple times per day
BREEZE	Oceanside, Vista, San Marcos, Escondido, Pala, Pauma Valley, Valley Center	251-300	10-50	Spanish	Multiple times per day
BREEZE	Oceanside, Vista, San Marcos, Escondido, Pala, Pauma Valley, Valley Center, Ramona	201-250	51-100	Spanish	Multiple times per day
BREEZE	Vista, San Marcos, Escondido, Carlsbad, Encinitas, Solana Beach, Del Mar, Pala, Pauma Valley, Valley Center	151-200	10-50	Spanish	Multiple times per day
BREEZE	Escondido	251-300	251-300	Spanish	Multiple times per day

Table 4 Cont'd.: BREEZE, FLEX, and LIFT Bus Service LEP Survey Results

Mode	What Area of N. San Diego	# of Daily Riders/Members	# of Daily LEP Riders/Members	LEP Languages Commonly Encountered	How often LEP/Week
BREEZE	Oceanside, Vista, San Marcos, Escondido, Carlsbad, Encinitas, Solana Beach, Del Mar, Pala, Pauma Valley, Valley Center	151-200	51-100	Spanish	Multiple times per day
BREEZE	Oceanside, Vista, San Marcos, Escondido, Pala, Pauma Valley, Valley Center, Ramona	151-200	51-100	Spanish	Multiple times per day
BREEZE	Oceanside, Vista, San Marcos, Escondido, Pala, Pauma Valley, Valley Center, Ramona	201-250	51-100	Spanish	Multiple times per day
BREEZE	Vista, San Marcos, Escondido, Solana Beach, Pala, Pauma Valley, Valley Center	251-300	51-100	Spanish	A few times per day
BREEZE	Escondido	301-500	10-50	Spanish	Multiple times per day
BREEZE	Escondido	< 10	< 10	None	Rarely
BREEZE	Escondido	301-350	151-200	Spanish	Multiple times per day
BREEZE	Oceanside, Vista, San Marcos, Escondido, Encinitas, Solana Beach, Fallbrook, Pala, Pauma Valley, Valley Center	151-200	10-50	Arabic, Persian, Spanish	Multiple times per day
BREEZE	Vista, San Marcos, Escondido, Pala, Pauma Valley, Valley Center	251-300	101-150	Spanish	Multiple times per day
BREEZE	Escondido	401-450	251-300	Spanish	Multiple times per day
BREEZE	Vista, San Marcos, Escondido, Encinitas, Solana Beach, Pala, Pauma Valley, Valley Center	251-300	10-50	Spanish	Multiple times per day
BREEZE	Vista, San Marcos, Escondido, Carlsbad, Solana Beach, Del Mar, Pala, Pauma Valley, Valley Center	351-400	151-200	Arabic, Chinese (Cantonese), Chinese (Mandarin), French, German, Korean, Polish, Russian, Spanish, Vietnamese	A few times per day
BREEZE	Oceanside, Vista, San Marcos, Escondido, Pala, Pauma Valley, Valley Center, Ramona	201-250	51-100	Spanish, Vietnamese	Multiple times per day
BREEZE	Vista, San Marcos, Escondido, Pala, Pauma Valley, Valley Center	151-200	51-100	Spanish	Multiple times per day
BREEZE	Oceanside, Vista, San Marcos, Escondido, Carlsbad, Encinitas, Solana Beach, Del Mar, Pala, Pauma Valley, Valley Center, Ramona	201-250	101-150	Spanish	Multiple times per day
BREEZE	Vista, San Marcos, Escondido, Pala, Pauma Valley, Valley Center	251-300	101-150	Spanish, Vietnamese	Multiple times per day
LIFT	Vista, San Marcos, Escondido, Carlsbad, Encinitas, Solana Beach, Pala, Pauma Valley, Valley Center	501-550	10-50	Spanish	A few times per day
LIFT	Oceanside, Vista, San Marcos, Escondido, Carlsbad, Encinitas, Solana Beach, Del Mar, Fallbrook, Bonsall, Pala, Pauma Valley, Valley Center	10-50	10-50	Spanish	A few times per day

Table 5: COASTER and SPRINTER LEP Survey Results

		# of Daily LEP	LEP Languages Commonly	How often
Responder/ Mode	# of Daily Riders/Members	Riders/Members	Encountered	LEP/Week
SPRINTER	601-650	201-250	Spanish	A few times per day
SPRINTER	801-850	451-500	Chinese (Cantonese), Chinese (Mandarin), Japanese, Korean, Russian, Spanish	A few times per day
SPRINTER	401-450	< 10	Spanish	Rarely
SPRINTER	251-300	< 10	Spanish	A few times per day
SPRINTER	251-300	< 10	Spanish	Rarely
COASTER	901-950	651-700	Spanish	A few times per month
COASTER	901-950	10-50	Arabic, Spanish	A few times per day
COASTER	951-1000	10-50	Chinese (Mandarin), Spanish, Vietnamese,	Multiple times per day
COASTER	951-1000	10-50	Chinese (Cantonese), Chinese (Mandarin), Spanish	A few times per week
COASTER	10-50	< 10	Spanish	Rarely
COASTER	10-50	10-50	Japanese, Korean, Spanish, Tagalog	A few times per day
COASTER	751-800	151-200	Chinese (Cantonese), Chinese (Mandarin), Japanese, Korean, Spanish, Vietnamese	A few times per day

Table 6: NCTD Customer Service LEP Survey Results

What Area of N. San Diego	# of Daily Riders/ Members	# of Daily LEP Riders/ Members	LEP Languages Commonly Encountered	How often LEP/Week
Oceanside	101-150	< 10	Spanish and Tagalog	A few times per week
Oceanside	10-50	10-50	Chinese (Cantonese), Chinese (Mandarin), Spanish	Multiple times per day
Oceanside, Escondido	101-150	10-50	Chinese (Mandarin), Spanish, Other	A few times per week
Oceanside	101-150	10-50	Spanish	Multiple times per day
Oceanside	51-100	10-50	Spanish	Multiple times per day
Escondido	51-100	10-50	Spanish	Multiple times per day
Escondido	51-100	10-50	Spanish	Multiple times per day
Oceanside	51-100	< 10	Chinese (Cantonese), Chinese (Mandarin), French, Japanese, Korean, Spanish, Tagalog, Vietnamese	A few times per day
Oceanside	51-100	10-50	Spanish	Multiple times per day
Oceanside	51-100	51-100	Spanish	A few times per day
Oceanside	51-100	10-50	Chinese (Mandarin), Spanish	Multiple times per day
Vista	10-50	< 10	Spanish	A few times per day

C. Factor 3: The nature and importance of the program, activity, or service provided by the recipient to people's lives.

Using the information gathered in the Factor 2 Analysis, Factor 3 findings suggest that access to public transportation is highly important for LEP persons. Because public transit serves such a large number of LEP individuals, results are largely focused around the need for, and access to, public transit.

D. Factor 4: The resources available to the recipient and costs.

NCTD has many resources available to assist LEP individuals. NCTD has in-house staff who are bilingual in English and other languages and who may be utilized to interpret conversations and/or translate documents. NCTD also has retained contractors to provide interpreting and document translations services. Additionally, NCTD takes advantage of other resources available such as utilizing the Google Translate widget on its website and providing notices in community media and newspapers that may be provided it various languages as necessary for outreach and marketing needs.

VI. LANGUAGE ASSISTANCE MEASURES

NCTD offers a variety of resources/services in multiple languages. These are provided at no cost to individuals upon request. Services include but are not limited oral interpreters, written language services, and translation of vital documents. Individuals may request such resources and services by accessing NCTD's website or by contacting NCTD's Customer Service Department. NCTD provides the following resources and services in languages other than English:

A. Vital Documents

1. List of Vital Documents

NCTD has identified the following as vital documents required to allow LEP riders to utilize its services:

- i. Rider's Guide;
- ii. ADA Rider's Guide:
- iii. Notices of Public Hearing;
- iv. Notices of Service Changes;
- v. Application for Reduced Fare Compass Card for Seniors, Individuals with Disabilities, and Individuals with a Medicare Card;
- vi. Application for Complementary Paratransit; and
- vii. Title VI Documents (e.g., Notices of Rights Under Title VI, Discrimination Complaint Form, etc.).

2. Translation of Vital Documents

i. Safe Harbor Provision

Based on the Four Factor Analysis, NCTD is required to provide language services to the total number of LEP customers who speak Spanish (50,135), Vietnamese (2,147), Chinese (1,680), Tagalog (1,291), and Korean (1,003). The LAP estimates that 81.93 percent of all LEP passengers (and 5.41 percent of the total population) in NCTD's service area speak Spanish. LEP customers who speak Vietnamese, Chinese, Tagalog, and Korean meet the Safe Harbor provision of FTA Circular 4702.1B; however, all represented significantly less than one (1) percent of the NCTD service area population.

Additionally, pursuant to NCTD's Administrative Policy and Procedure *GM-0010, Language Assistance Plan Implementation*, NCTD has established a LAP Committee to review vital document/media requests and to discuss ways to improve accessibility for NCTD's LEP customers. The LAP Plan is uploaded to NCTD's document management system to enable review by all NCTD staff, available in the General Administration Office of NCTD, and explained in training sessions for supervisors and other staff who regularly communicate with LEP customers.

ii. Spanish Translation

Due to the significantly large number of Spanish speaking LEP passengers in Factor 1 as compared to the other languages as well as the frequency in which Spanish speaking LEP passengers come into contact with NCTD, NCTD translates all vital documents into Spanish. NCTD's Administrative Policy and Procedure *GM-0010*, *Language Assistance Plan Implementation* (Attachment A), establishes this requirement and identifies NCTD's list of vital documents/media.

iii. Chinese, Vietnamese, Tagalog, and Korean Translation

Based on the Factor 1 analysis, Vietnamese, Chinese (both Mandarin and Cantonese), Tagalog, and Korean met the Safe Harbor threshold with over 1,000 speakers but combined only represent 0.66% of the NCTD service area population.

Additionally, in reviewing the Factor 2 analysis, LEP customers who speak a language other than Spanish come into contact with NCTD at a significantly lower frequency. Due to the lower frequency of contacts and almost no demand for translation in languages other than Spanish, NCTD will make available certain vital documents in other languages as necessary or upon request. However, the following vital documents are available in all languages on NCTD's website: Title VI Notice, Title VI Complaint Form, Title VI Complaint Process, and availability for information to be translated into another language.

For Rider's Guide, notices of public hearings and service changes, and reduced fare and complementary paratransit applications, NCTD will decide on need for translation into a Safe Harbor language (or any other language) on a case by case scenario based on the area, subject matter, and local populations needs or upon request. However, NCTD's website includes the Google Translation widget, which allows for information on the website to be translated into each of NCTD's LEP languages, plus numerous other languages.

B. Written Language Assistance

- · Bilingual or multilingual versions of:
 - Spanish language fare payment instructions
 - Spanish language system maps and timetables
 - o Printed Spanish language service change announcements
 - o Spanish versions of vital documents/media available on NCTD's website
- Ticket vending machines with Spanish language functions

C. Oral Language Assistance

- Using on-call translation and interpretation services
- Contracting for interpreters on an as-needed basis
- Using bilingual staff to interpret information on an as-needed basis

D. Community Outreach

- Input from community-based organizations on conducting outreach to LEP communities
- "Community Outreach Contacts List" that consists of the emails and contact information to coordinate with community organizations, employers, advocacy groups, and other groups with whom NCTD staff would communicate and provide information to for distribution to traditionally underserved population segments
- Spanish language radio advertisements
- Advertisements in ethnic media
- Bilingual staff at community outreach events
- Translators present at community meetings, as needed
- Opportunity for both oral and written comments

E. Transit Stations

- Written bilingual English/Spanish instructions on how to make fare payments, schedules, route maps, and information on how to use the system available in Riders Guide and ADA Riders Guide
- Staff awareness regarding availability of translated materials
- Announcements at SPRINTER station are recorded in English and Spanish

F. Vehicles

- Bilingual operators (limited)
- Visible bilingual English/Spanish schedules, route maps, and information on how to use the system
- Information on how to request information in another languages, written in each of the Safe Harbor languages

G. <u>Customer Service</u>

- Bilingual English/Spanish customer service staff
- Bilingual English/Spanish interactive voice response utilized

- "I Speak" Form to identify language spoken by the customer (Attachment B)
- Staff Language List for in-house interpretations/translations
- Telephonic interpretation services

VIII. TRAINING STAFF

NCTD ensures that employees are knowledgeable about the District's obligations to provide meaningful access to information and services for LEP persons. NCTD ensures that employees having contact with the public have knowledge in the following areas:

- NCTD's Administrative Policy and Procedure GM-0010, Language Assistance Plan Implementation;
- A summary of NCTD's obligations under DOT LEP Guidance;
- A summary of NCTD's LAP;
- Resources available to determine the language needs of a customer;
- Resources available to ensure that access is provided in a timely and effective manner;
- Working effectively with language interpreters;
- Available documents that have been translated into languages other than English, and policies and procedures;
- Types of language services available;
- How staff can obtain those services;
- How to respond to LEP callers;
- How to respond to written communication from LEP persons; and
- How to respond to LEP individuals who have in-person contact with staff.

NCTD's Civil Rights Officer disseminates the LAP policies and procedures to all employees likely to have contact with LEP customers and will introduce pertinent employees to LEP policies and procedures by providing LAP training.

IX. PROVIDING NOTICE TO LEP PERSONS

As more thoroughly discussed in earlier sections of this report, NCTD currently provides notice to LEP individuals in a number of ways. These include:

- NCTD's Title VI Policy and Complaint Form, located on NCTD's Website, includes a summary of language assistance measures NCTD provides and how to request additional information in another language. NCTD's Title VI Complaint forms are translated in all Safe Harbor languages and the Google translation Widget allows the entire website, including the Title VI webpage to be translated into any language.
- NCTD' Title VI Notice, which includes information about the public rights under Title VI and how to request the information in alternative languages, is provided in the:
 - o In NCTD's Fixed Route busses and COASTER and SPRINTER rail vehicles
 - o In NCTD's Rider's Guide

- In the lobby of the NCTD's General Administrative Office, which is printed in English and Spanish
- In NCTD's Rider's Guides, which is printed in English and Spanish;
 - On a decal placed within each paratransit vehicle, which is displayed in English and Spanish.
- Signs posted at the General Administration Office, transit centers, and transportation modes as appropriate specifying language assistance availability. The signs display the most commonly spoken languages in NCTD's service area (English, Spanish, Vietnamese, Tagalog, Chinese, and Korean) stating that language services are available free of charge to LEP individuals (Attachment C).
 - In the case of illiteracy or languages into which written materials have not been translated, such forms and documents can be read to LEP individuals in their primary languages
- NCTD's Complementary Paratransit Application, located on NCTD's website, includes information regarding how to request an application in an alternative language. The application is available on NCTD's website in English and Spanish.
- NCTD's Board Meeting and other Committee Meeting Agendas include a notice on how to request the agenda in alternative formats or to request other accommodations to facilitate meeting participation.
- NCTD"s Customer Service telephone line provides a verbal prompt regarding whether Spanish language assistance is requested.
- Translated information for fare changes and other important notices
- Access to telephonic interpreters, which includes over 250 languages
- Press release distribution to ethnic media, who regularly translate material for their audiences
- Interpreters at community meetings
- Presence at community events with LEP attendees
- Leveraging community partners to help disseminate notice of availability of language assistance to LEP populations

X. MONITORING AND UPDATING THE LANGUAGE ASSISTANCE PLAN

In monitoring compliance, an assessment will be conducted on a triennial basis to determine whether the District's procedures allow LEP persons to overcome language barriers and participate in a meaningful way in the program activities and services to assess the following:

- The current LEP makeup of its service area;
- The current communication needs of LEP applicants and customers;
- Whether existing assistance is meeting the needs of such persons;
- Whether staff is knowledgeable about policies and procedures and how to implement them; and
- Feedback from staff to determine the effectiveness and usefulness of LAP policies and procedures.

In addition, the data used to identify LEP persons in NCTD's service area is compiled by SANDAG every four (4) years and any updated data will be incorporated accordingly into NCTD's LAP upon receipt.

It is NCTD's intent to continually evaluate effectiveness and, based on the results, make modifications where necessary. It is the responsibility of the Civil Rights Officer to continually review and determine whether new documents, programs, services and activities need to be made accessible for LEP individuals and provide notice to the LEP public and to employees of any changes in programs or services. In addition, the Civil Rights Officer will consider whether changes in demographics, types of services, or other needs require re-evaluation of NCTD's LAP.

The Civil Rights Officer evaluates NCTD's LAP by seeking feedback from the community and assesses plan modifications based on:

- Current LEP population in service area or population encountered or affected;
- Frequency of encounters with LEP language groups;
- Nature and importance of activities to LEP persons;
- Availability of resources, including technological advances, additional resources, and the cost imposed;
- Whether staff know and understand LAP policies and procedures and are able to implement them; and
- Whether identified sources for assistance are still available and viable.

ATTACHMENT A

NCTD Administrative Policy and Procedure GM-0010, Language Assistance Plan Implementation



ATTACHMENT B

"I Speak" form

ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية.	1. Arabic
Խնդրում են ջ նչում կատարե ջ այս քառակուսում, եթե խոսում կամ կարդում եջ Հայերեն:	2. Armenian
যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্ষে দাগ দিন	3. Bengali
ឈ្ងមបញ្ជាក់ក្នុងប្រអប់នេះ បើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។	4. Cambodian
Motka i kahhon ya yangin ûntûngnu' manaitai pat ûntûngnu' kumentos Chamorro.	5. Chamorro
如果你能读中文或讲中文,请选择此框。	6. Simplified Chinese
如果你能讀中文或講中文,請選擇此框。	7. Traditional Chinese



Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik.	8.Croatian
Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky.	9. Czech
Kruis dit vakje aan als u Nederlands kunt lezen of spreken.	10. Dutch
Mark this box if you read or speak English.	11. English
اگر خواندن و نوشتن فارسي بلد هستيد، اين مربع را علامت بزنيد.	12. Farsi



Cocher ici si vous lisez ou parlez le français.	13. French
Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen.	14. German
Σημειώστε αυτό το πλαίσιο αν διαβάζετε ή μιλάτε Ελληνικά.	15. Greek
Make kazye sa a si ou li oswa ou pale kreyòl ayisyen.	16. Haitian Creole
अगर आप हिन्दी बोलते या पढ़ सकते हों तो इस बक्स पर चिह्न लगाएँ।	17. Hindi
Kos lub voj no yog koj paub twm thiab hais lus Hmoob.	18. Hmong
Jelölje meg ezt a kockát, ha megérti vagy beszéli a magyar nyelvet.	19. Hungarian



Markaam daytoy nga kahon no makabasa wenno makasaoka iti Ilocano.	20. llocano
Marchi questa casella se legge o parla italiano.	21. Italian
日本語を読んだり、話せる場合はここに印を付けてください。	22. Japanes
한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오.	23. Korean
ໃຫ້ຫມາຍໃສ່ຊ່ອງນີ້ ຖ້າທ່ານອ່ານຫຼືປາກພາສາລາວ.	24. Laotian
Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim.	25. Polish



Assinale este quadrado se você lê ou fala português.	26. Portuguese
Însemnați această căsuță dacă citiți sau vorbiți românește.	27. Romanian
Пометьте этот квадратик, если вы читаете или говорите по-русски.	28. Russian
Обележите овај квадратић уколико читате или говорите српски језик.	29. Serbian
Označte tento štvorček, ak viete čítať alebo hovoriť po slovensky.	30. Slovak
Marque esta casilla si lee o habla español.	31. Spanish
Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	32. Tagalog



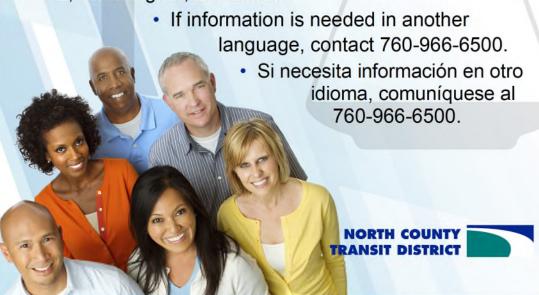
	9
ให้กาเครื่องหมายลงในช่องถ้าท่านอ่านหรือพูคภาษาไทย.	33. Thai
Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga.	34. Tongan
Відмітьте цю клітинку, якщо ви читаєте або говорите українською мовою.	35. Ukranian
اگرآپاردوپڑھتے یا بولتے ہیں تواس خانے میں نشان لگا ئیں۔	36. Urdu
Xin đánh dấu vào ô này nếu quý vị biết đọc và nói được Việt Ngữ.	37. Vietnamese
באצייכנט דעם קעסטל אויב איר לייענט אדער רעדט אידיש.	38. Yiddish

ATTACHMENT C

Notice to Beneficiaries of Rights Under Title VI

Notifying the Public of Rights Under **Title VI**

- The North County Transit District (NCTD) operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with NCTD.
- For more information on NCTD's civil rights program, and the procedures to file a complaint, contact 760-966-6500 (persons with hearing impairment should call the 711 California Relay Service), email creports@nctd.org, or visit in-person at a Customer Service Center. You may also visit our website at www.GoNCTD.com.
- A complainant may file a complaint direct with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Complaint Team, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.



Chinese (Simplified) – 如果需要其他语种的信息,请致电 760-966-6500。 Chinese (Traditional) – 如需其他語言版本的資訊,請致電 760-966-6500。 Vietnamese – Nếu cần thông tin bằng ngôn ngữ khác, xin liên hệ số 760-966-6500. Filipino – Kung kailangan ang impormasyon sa ibang wika, makipag-ugnayan sa 760-966-6500. Korean – 정보가 다른 언어로 필요하시다면 760-966-6500로 문의해 주십시오.

Notificación Pública sobre derechos bajo el **Title VI**

- El Distrito de Transporte del Condado Norte (NCTD)
 opera sus programas y servicios sin importar raza, color u
 origen nacional de acuerdo al Título VI del Acto de
 Derechos Civiles. Cualquier individuo que crea que ha
 sido discriminado(a) ilegalmente bajo los estatutos del
 Título VI puede presentar una queja con NCTD.
- Para más información sobre el programa de Derechos Civiles de NCTD y los procedimientos para presentar una queja por favor llame al 760-966-6500 (o al servicio de retransmisión de California 711 para personas con problemas auditivos), mande correo electrónico a creports@nctd.org, o visítenos en persona en cualquiera de nuestros centros de servicio a clientes.También puede presentar su queja visitando nuestra página web en www.GoNCTD.com.

 Un demandante puede presentar una denuncia directamente con la Administración Federal de Transporte, enviándola a la Oficina de Derechos Civiles, Atención a: Complaint Team, East Building, 5th Floor-TCR, 1200 New



Chinese (Simplified) – 如果需要其他语种的信息,请致电 760-966-6500。 Chinese (Traditional) – 如需其他語言版本的資訊,請致電 760-966-6500。 Vietnamese – Nếu cần thông tin bằng ngôn ngữ khác, xin liên hệ số 760-966-6500. Filipino – Kung kailangan ang impormasyon sa ibang wika, makipag-ugnayan sa 760-966-6500. Korean – 정보가 다른 언어로 필요하시다면 760-966-6500로 문의해 주십시오.