



Board of Directors Regular Meeting
Meeting Date: 5/17/2018
Agenda Item No.: 2018-May-12.

SACOG Board of Directors

Subject: Approve SACOG Title VI Program Report and Limited English Proficiency Plan (Est. time: 0 minutes)

Consent

Prepared by: Sharon Sprowls

Approved by: James Corless

Attachments: Yes

1. Issue:

The Federal Transit Administration (FTA) requires that Metropolitan Planning Organizations that are direct recipients of FTA funds submit a program report every three years on compliance with Title VI of the Civil Rights Act of 1964.

2. Recommendation:

The Transportation Committee unanimously recommends that the Board approve by resolution the 2018 SACOG Title VI Program Report and Limited English Proficiency (LEP) Plan to meet the requirements of Title VI and the FTA.

3. Background/Analysis:

Title VI and its implementing regulations require that FTA funding recipients take responsible steps to ensure equal access to programs and services, regardless of participant race, color, or national origin. Staff has developed the attached draft 2018 Title VI Program Report in compliance with the most recent Title VI Guidance from the FTA (FTA Circular 4702.1B released in October 2012) and confirmed that SACOG has undertaken required steps to ensure equal access to all programs and services.

4. Discussion/Analysis:

As part of SACOG's required update to FTA, SACOG must also have a Plan for Special Language Services to LEP populations. Staff has updated SACOG's previous LEP Plan, adopted in 2015, using current data from the American Community Survey, and showing the steps SACOG takes to ensure that all persons, including those with limited English proficiency, have meaningful access at no cost to SACOG's programs and services, including the availability of language assistance.

Staff requests Board approval of SACOG's 2018 Title VI Program Report and LEP Plan,

and the authorizing resolution so that staff may submit the report to FTA. The report is included in Attachment A. Due to the length of this report, all appendices are not attached here but are available upon request.

5. Fiscal Impact/Grant Information:

There is no fiscal impact to SACOG's operating budget.

ATTACHMENTS:

Description

Attachment A - 2018 SACOG Title VI Program Report and Limited English Proficiency (LEP) Plan

Attachment B - Resolution

This staff report aligns with the following SACOG Work Plan Goals:

#4 - Connect Low-Income & Disadvantaged Populations to Jobs & Opportunity

SACOG 2015 Compliance Report Title VI of the Civil Rights Act of 1964

May 17, 2018

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Introduction

This report provides information and analysis on compliance by the Sacramento Area Council of Governments (SACOG) with Title VI of the 1964 Civil Rights Act regarding nondiscriminatory delivery of services and benefits under federally-funded programs or activities. This was prepared by SACOG consistent with Federal Transit Administration (FTA) Circular 4702.1B, dated October 1, 2012 (the Circular).

Section A provides a description of SACOG and the Sacramento region. Section B complies with FTA's general reporting requirements, and Sections C and D address program-specific requirements. The appendices provide additional information.

Section A. SACOG Description

The Sacramento Area Council of Governments (SACOG) is an association of local governments in the six-county Sacramento Region. Its members include the counties of El Dorado, Placer, Sacramento, Sutter, Yolo and Yuba and 22 cities within those counties. SACOG's boundaries do not include the eastern (Tahoe) portion of El Dorado or Placer counties.

SACOG provides transportation planning and funding for the region, and serves as a forum for the study and resolution of regional issues. In addition to preparing the region's long-range transportation plan, SACOG assists in funding and planning for transit, pedestrian, and bicycle networks, roadways, transportation pilots and innovations, Intelligent Transportation Systems, clean air, and airport land uses. SACOG also develops and approves a state-required Regional Housing Needs Allocation (RHNA) for the six-county region that establishes the total number of affordable housing units that each city and county must plan for within an eight-year planning period.

SACOG's Board of Directors is comprised of county supervisors and city councilmembers, appointed by the 28 member jurisdictions. The Director of Caltrans District 3 serves as an ex-officio member. The SACOG Board meets once a month (excluding July) at SACOG's office in downtown Sacramento. There are also three standing committees of the Board – Transportation, Land Use and Natural Resources, and Government Relations and Public Affairs – that generally meet monthly. Board members serve multi-year terms and may be reappointed. The chair and vice-chair, elected by voting members of SACOG, serve one-year terms.

SACOG functions as both the state-designated regional transportation planning agency (RTPA) for the four-county region, which includes Sutter, Yuba, Yolo and Sacramento counties, and the six-county region's metropolitan planning organization (MPO) for federal purposes. As such, it is responsible for regularly updating the Regional Transportation Plan – called the Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) in the SACOG region. The development of the Sustainable Communities Strategy (SCS) as part of the MTP process is required by California State Senate Bill 375 (SB 375).

SACOG’s most recent MTP/SCS was adopted in February 2016. The MTP/SCS seeks to help support implementation of the region’s Blueprint growth vision. It focuses on a more compact growth pattern, improving the safety and maintenance of roadways, investing in new options for people to walk, bike and take transit, preserving agricultural land and productivity, and connecting transportation planning with land use planning to reduce greenhouse gas emissions and ensure public dollars are used efficiently.

The 2016 MTP/SCS update extended the plan period until 2036. SACOG did not project significantly different growth in the region. The update made some shifts in the location of expected housing and employment growth and in the transportation project list. A major emphasis in the update was on opportunities to shift dollars to asset management, maintenance and rehabilitation to keep the existing transit and roadway system in a state of good repair. A key effort by staff was to conduct a project phasing analysis. This analysis looked at the performance of existing road and highway segments to determine when proposed capacity projects would have significant enough projected usage to warrant investment. This allowed the delay or later phasing of some proposed projects or project segments to free up funds for the “fix-it first” emphasis in the plan.

The MTP/SCS planned for \$35 billion in funding dedicated to the following categories:

Maintenance and Rehabilitation	\$12.6 billion	36%
Transit Operations and Maintenance	\$7.1 billion	20%
Transit Capital	\$3.5 billion	10%
Road and Highway Capacity	\$5.8 billion	17%
Bicycle/Pedestrian Improvements	\$2.8 billion	8%
System Management, Operations and ITS	\$1.5 billion	4%
Programs and Planning	\$1.7 billion	5%

State and federal laws have given SACOG and other RTPAs/MPOs an increasingly important role in regional planning and transportation funding. The Intermodal Surface Transportation Efficiency Act (ISTEA) and subsequent federal transportation reauthorization measures empowered MPOs like SACOG to determine the mix of transportation projects best suited to meet their regions’ needs. State legislation passed in 1997 gave SACOG and other regional transportation planning agencies increased decision-making authority over the selection of state highway projects and the allocation of transit expansion funds for the State Transportation Improvement Program (STIP). SACOG also administers state funds, including those provided by the Transportation Development Act (TDA). SB 375, passed in 2008, requires SACOG and other MPOs to more closely link their transportation planning with regional land use, housing, and climate change planning.

As the MPO, SACOG has a varying level of administrative oversight and programming responsibilities for FTA funds that flow to the Sacramento region. SACOG’s role includes:

- Biennial programming of FTA 5307 and 5339 grant funds.

- Letters of concurrence for FTA 5307 and 5339 grant funds, confirming the inclusion of the proposed project in SACOG's MTIP/FTIP with the stated description and funding amounts.
- Programming of Sacramento Urbanized Area FTA 5310 grants, using the Caltrans project review criteria to award funds. Caltrans continues to administer these grants with FTA.
- Input on FTA 5310 and 5311 grants provided to Caltrans. SACOG staff scores 5310 small urban/rural applications from the SACOG four-county RTPA area and provides recommendations to Caltrans on these projects, and produces a program of projects allowing qualifying transit agencies to apply for 5311 funds.
- Direct control over the region's Surface Transportation Project (STP) and Congestion Management and Air Quality (CMAQ) funds in program rounds every two to three years.
- Receipt of Federal Highway Administration Section 5303 funds that are passed through to SACOG by Caltrans as part of the planning funds used for MPOs. This is based on federal requirements for MPOs found in CFR 49 that include the requirement for Certification review of SACOG conducted every four years by FTA and FHWA.

Table 1 summarizes SACOG's role concerning these funding sources. The funding amounts shown are for Federal Fiscal Year (FFY) 2015 to FFY 2018.¹

¹ The federal fiscal year (FFY) is October through September; SACOG's fiscal year (FY) is July to June.

**Table 1: SACOG Oversight and Monitoring
Federal Transit Funds
for which:**

SACOG is the Designated Recipient	Designated Recipient(s)	Subrecipients	FFY2015	FFY2016	FFY2017	FFY2018
CMAQ Public Transit Related Work	SACOG	11 Agencies	\$2,250,000	\$4,000,000	\$5,600,000	\$450,000
Federal Subtotal						
Transit Operator is the Designated Recipient						
			FFY2015	FFY2016	FFY2017	FFY2018
FTA 5309 (a) - Rail and Fixed Guideway Modernization	SRTD	None				No Final Allocation
FTA 5309 (b) - New Rail Starts	SRTD	None				\$13,988,074
FTA 5309 – Fixed Guideway Capital Investment	SRTD	None				No Final Allocation
FTA 5307 - Urbanized Area Formula Program	SRTD	Several Transit Operators	\$24,633,910	\$24,922,108	\$25,418,493	No Final Allocation
FTA 5339 – Bus and Bus Facilities	SRTD	Several Transit Operators	\$2,096,484	\$1,916,008	\$1,984,486	No Final Allocation
Federal Subtotal						
State is Designated Recipient						
			FFY2015	FFY2016	FFY2017	FFY2018
FTA 5307 – Small Urbanized Area Formula Program Yuba City-Marysville, Woodland and Davis	Caltrans	3 Transit Operators	\$7,085,183	\$7,000,733	\$7,108,259	No Final Allocation
FTA 5311 (b) - Rural Transit Assistance Program*	Transit Operators	None - Completed through the State	\$627,776	\$1,160,573	\$549,686	\$739,439

*Actual amounts of funds programmed. Carryover funds used in some years.

State is Designated Recipient			FFY2015	FFY2016	FFY2017	FFY2018
FTA 5310** Elderly and Disabled Specialized Transit Program (SACOG area small urban/rural and Sacramento UZA	Transit Operators, Non-Profit and Human Service Transportation Providers	None-Completed through the State			\$5,758,158**	No Final Allocation
Federal Subtotal						
		Total	\$36,693,353	\$38,999,422	\$46,419,082	\$15,177,513

**FFY 2015, 2016, and 2017 funds were applied for in one bulk amount to FTA. Funding amount shown in FFY 2017 only.

Section B. General Reporting Requirements

FTA Circular 4702.1B provides instructions for the completion of this Title VI Program Update as they apply to SACOG in its role as a MPO. The reporting period covered in this document is Fiscal Years (FY) 2014/15 to 2016/17.

The following requirements are imposed on all FTA recipients and subrecipients to ensure that their programs, policies and activities comply with the Department of Transportation (DOT) Title VI regulations.

1. Requirement to Provide an Annual Title VI Certification and Assurance

The annual Title VI Certification and Assurances were provided to the FTA via an update in the FTA's web-based Grants Management System (TrAMS). The SACOG certifications and assurances, signed by SACOG's Chief Executive Officer and Chief Operating Officer/General Counsel, were last updated on March 8, 2018.

SACOG staff has also reviewed the latest Title VI triennial reports of transit operators who are required to submit them, maintains a list of when the next updates are due, and has asked transit operators to insure SACOG is provided a copy of any draft Title VI updates prior to finalization.

2. Requirement to Develop Title VI Complaint Procedures

SACOG has developed a Title VI complaint procedure, consistent with the FTA Circular, for addressing Title VI complaints filed with the agency. The complaint procedure is posted on SACOG's website at <https://www.sacog.org/post/title-vi-civil-rights-act-1964>, which provides information in English, Spanish and Chinese. SACOG's procedure and associated forms are attached in Appendix A.

3. Requirement to Record Title VI Investigations, Complaints, and Lawsuits

There have been no investigations, complaints or lawsuits against SACOG during the reporting period.

4. Requirement to Provide Meaningful Access to LEP Persons

Presidential Executive Order 13166 requires federal agencies to implement measures to ensure that people who speak limited English have meaningful access to federally conducted and federally funded programs and activities, consistent with Title VI of the Civil Rights Act of 1964. Both the U.S. DOT and FTA have implemented guidance or directives in furtherance of Executive Order 13166. In compliance with these directives, SACOG is committed to taking reasonable steps to ensure that all persons have meaningful access to its programs, services, and information, at no additional cost to individuals making the requests.

SACOG has adopted a Plan for Special Language Services to Limited English Proficient (LEP) Populations. It documents the various measures SACOG uses to assist persons with limited proficiency in English. To develop the LEP Plan, SACOG utilized the U.S. Department of Transportation's four-factor LEP analysis, which considers the following:

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 SACOG programs, activities or services;
3. The importance to LEP Persons of SACOG's programs, activities and services; and
4. The resources available to SACOG and overall cost to provide LEP assistance.

Based on the "Determination of Need" outlined in the Plan, SACOG identified Spanish as the most prevalent non-English language in the region, and the one into which SACOG will translate key materials, including transportation information, Title VI information, and certain publicity and outreach materials.

SACOG will also continue to offer translation assistance as described in the LEP Plan for Unmet Transit Needs hearings, MTP/SCS input opportunities, and other major decision-making processes, and will tailor public participation activities to reflect the unique LEP population(s) in each county in the SACOG region. For the MTP/SCS, partnerships will continue to be sought with community groups who can assist SACOG in strengthening opportunities to meet language needs and gain the input of local LEP residents. SACOG's full LEP Plan is attached as Appendix B.

5. Requirement to Notify Beneficiaries of Protection under Title VI

The requirement to notify beneficiaries of protection under Title VI includes:

- a. A statement that SACOG is committed to ensuring that no person is excluded from participation in, denied the benefits of, or discriminated against under its projects, programs or activities on the basis of race, color, creed, national origin, sex or age, as provided in Title VI of the Civil Rights Act and 49 United States Code Section 5332;
- b. A description of the procedures that members of the public should follow to request additional information on SACOG's nondiscrimination obligations; and
- c. A description of the procedures that members of the public should follow to file a discrimination complaint.

The SACOG Board has adopted the following non-discrimination policy:

It is SACOG's policy to comply with state and federal laws and regulations including Title VI of the Civil Rights Act of 1964, Americans with Disabilities Act of 1990 (ADA) and other federal discrimination laws and regulations, as well as the Unruh Civil Rights Act of 1959, the California Fair Employment and Housing Act, and other California State

discrimination laws and regulations. SACOG does not discriminate on the basis of race, color, sex, creed, religion, national origin, age, marital status, ancestry, medical condition, disability, sexual orientation or gender identity in conducting its business. SACOG prohibits discrimination by its employees, contractors and consultants.

This policy is made known through the SACOG website, SACOG office posting, SACOG's personnel rules, Requests for Proposals, contracts, employment notices, and Public Participation Plan.

As required by Chapter III of the FTA Circular, SACOG has a Title VI complaint procedure that describes the process for addressing Title VI complaints and is consistent with FTA guidelines found in the Circular. The complaint procedure and complaint forms are posted on SACOG's website in English, Spanish and Chinese: <https://www.sacog.org/post/title-vi-civil-rights-act-1964> and included in Appendix A. Persons who believe they have been subjected to discrimination or have been denied access to services or accommodations required by law, have the right to use this complaint procedure.

The responsibility for the implementation of the discrimination complaint procedures is assigned to SACOG's Title VI Coordinator. The complaint procedure has five steps: 1) written complaint within 60 days of the date of the alleged discrimination; 2) review and written response by SACOG; 3) request for reconsideration and SACOG response; 4) request for appeal and SACOG response; and 5) complaint submission to FTA. The address for mailing Title VI complaints to FTA is included on SACOG's website. Chapter IX of the FTA Circular 4702.1B, which outlines the complaint process to the Federal Transit Administration, may be obtained by requesting a copy from SACOG's Title VI Coordinator at 916-321-9000.

SACOG also incorporates notice of the availability of language assistance into its existing outreach materials for public workshops on key planning efforts that alert interested individuals on how to request translation services. See Appendix C, *Sample Beneficiary Notifications*, for a sampling of SACOG's written notices and website information.

6. Requirement to Provide Additional Information upon Request

SACOG will comply with any requests made by FTA to investigate complaints of discrimination or to resolve concerns about possible noncompliance with Title VI.

7. Requirement to Prepare and Submit a Title VI Program

The following required information is discussed above:

- Information regarding SACOG's multi-lingual program,
- Title VI complaint procedures,
- Title VI investigations/complaints/lawsuits, and
- Instructions to the public regarding how to file a complaint

Chapter III of the Circular also requires submission of the following:

- A summary of public outreach and involvement activities undertaken since the last submission and a description of steps taken to ensure that minority and low-income people had meaningful access to these activities.

During the reporting period, SACOG has continued to expand its outreach and involvement efforts. These are summarized below:

Metropolitan Transportation Plan/Sustainable Communities Strategy

SACOG has been committed for many years to strengthening its community engagement to seek out and consider the viewpoints of community stakeholders, including minority, low-income, and LEP populations, especially in the course of developing the MTP/SCS, SACOG's core activity. The agency's public participation strategy (Appendix D) offers early and ongoing opportunities for the public to be involved in the identification of transportation needs, priorities, performance measures, and preferences among potential mixes of transportation projects and funding allocations through a variety of mechanisms.

SACOG's Board adopted the 2016 MTP/SCS in February 2016. MTP/SCS Chapter 2 details the measures taken by SACOG to broadly involve the public in developing the plan update. SACOG used numerous strategies to obtain input, including: development of a cross-sectoral Sounding Board; regional phone polling; eight public open houses/workshops at popular existing community gatherings, such as food truck events, farmer's markets, and art fairs; on-line surveys; outreach and descriptive materials and surveys in Spanish; and a transparent Board process open to the public.

SACOG recruited a diversity of stakeholders for the Sounding Board to help guide the 2016 MTP/SCS process, representing:

- affordable housing
- equity, public health and human services
- community-based organizations
- agriculture
- land development
- economic and community development
- seniors and aging populations
- environmental advocates
- transportation advocates

Significant outcomes from the quarterly meetings of the Sounding Board included stakeholder input on priority performance metrics for developing the 2016 MTP/SCS, feedback on the land use forecast methodology, scenario development, environmental justice areas, economic and phasing analysis, draft preferred scenario, and content and approach for public workshops.

To develop the 2016 MTP/SCS, SACOG also conducted eight public workshops throughout the region, as required by SB 375, to educate the public and seek feedback on their priorities for transportation and the 2016 MTP/SCS. With the implementation focus of this update, the SACOG Board directed staff to develop workshop content and an active participation format that would engage informed stakeholders and also expand outreach to new stakeholders. With that direction, staff developed open-house format workshops and made efforts to conduct most workshops at popular existing community gatherings, such as food truck events, farmer's markets, art fairs, etc. Appendix E includes fliers in English and Spanish showing these locations.

Additionally, staff developed online modules of the workshop materials and survey, in Spanish and English, to increase opportunities for residents not able to attend a workshop in person to participate.

This approach resulted in a more cost-effective process and a greater number and diversity of people participating than for development of the 2012 MTP/SCS. A summary of the workshop participation and demographics is shown below, and compared with regional demographics.

County of Workshop	2014 Walk Ins (participated but did not complete survey)	2014 Surveys Completed	2010 Surveys Completed
El Dorado County	35	22	65
Placer County	22	19	37
Sacramento County (central)	214	163	203
Sacramento County (north)	120	100	60
Sacramento County (south)	36	25	43
Sutter County	34	26	40
Yolo County	100	87	98
Yuba County	32	24	37
Online Survey	347	187	<i>Not applicable</i>
TOTAL	940	653	583

Gender	2014 Workshop Survey Responses	2014 Online Survey Responses	2013 Regional Census ACS
Female	46%	44%	51%
Male	51%	55%	49%
Other	0.2%	0%	Not available
Decline to State	2%	2%	Not applicable

Note: Excludes 62 respondents who chose not to answer this question

Age Distribution	2014 Workshop Survey Responses	2014 Online Survey Responses	2013 Regional Census ACS
14-24	17%	1%	14% (15-24 yrs)
25-34	18%	15%	14%
35-54	38%	43%	26%
55-64	16%	27%	12%
65+	10%	14%	13%

Note: Excludes 103 respondents who chose not to answer this question

Race/Ethnicity Distribution	2014 Workshop Survey Responses	2014 Online Survey Responses	2013 Regional Census ACS
African American	7%	1%	7%
Asian	7%	5%	13%
Hispanic/Latino	10%	1%	21%
Caucasian	65%	88%	54%
Multiple	6%	4%	<i>Not available</i>
Other	5%	2%	<i>Not available</i>

Note: Excludes 99 respondents who chose not to answer this question

Household Income Distribution	2014 Workshop Survey Responses	2014 Online Survey Responses	2013 Regional Census ACS
Less than \$15,000	14%	1%	12%
\$15,000 – \$24,999	9%	1%	10%
\$25,000 – \$34,999	8%	1%	10%
\$35,000 – \$49,999	7%	6%	13%
\$50,000 – \$74,999	17%	18%	18%
\$75,000 – \$99,999	15%	17%	12%
\$100,000 – \$149,999	16%	33%	14%
\$150,000 – \$199,999	7%	14%	6%
More than \$200,000	6%	9%	5%

Note: Excludes 108 respondents who chose not to answer this question

As part of SACOG's public engagement strategies for the 2016 MTP/SCS update, SACOG also contracted with CJI Research Inc. for a scientifically valid public attitude survey. The phone survey included 1,600 respondents, with 200 interviews each conducted in El Dorado, Placer, Sutter, Yolo, and Yuba counties; and 600 interviews within Sacramento County, where distribution was roughly proportionate to population distribution among the City of Sacramento, unincorporated Sacramento County, and the sum of the other incorporated cities within the county. The survey included questions designed to gather public attitudes concerning current transportation conditions and priorities for improvements.

Staff released the draft 2016 MTP/SCS update for public review in September 2015. Staff responded in detail to all public comments.

Following adoption of the 2016 MTP/SCS, SACOG began work on the next cycle of MTP/SCS planning and development. After the success of the 2016 process, many of the public participation strategies will be continued for the 2020 MTP/SCS update. A broad-based Sounding Board met for the first time in September 2017 and will continue to meet throughout the process to help guide development of the next MTP/SCS. SACOG will also conduct broad outreach and engagement in English and Spanish through public events, online opportunities, and social media.

SACOG's PPP (Appendix D) also outlines strategies used for public involvement in the Metropolitan Transportation Improvement Program (MTIP), which shows the schedule, scope and funding of intended transportation improvements that reflect transportation decisions in the MTP/SCS. SACOG seeks to keep every programming round open and transparent to provide public access to the process, including through notices, policy and technical information, committee meetings, the SACOG website, opportunities to comment, and individual responses to comments. SACOG works to provide ongoing communications and engagement in various processes to the four federally-recognized Native American Indian tribal governments in the region.

Unmet Transit Needs

As noted in the LEP Plan (Appendix B), SACOG publicizes annual Unmet Transit Needs hearings for Sacramento, Sutter, Yolo, and Yuba counties in both English and Spanish. SACOG sends press releases to and purchases advertisements publicizing the hearings in non-English language newspapers, when available. For the most recent Unmet Transit Needs hearing held in Galt in October 2017, the availability of Spanish translation was specifically publicized; translation and sign-language services are always offered on request. These services have been utilized by some participants, including sign language interpretation contracted through NorCal Services for Deaf and Hard of Hearing, Inc. All locations are accessible to persons with disabilities, and publicity materials include information on transit routes to reach each hearing location. SACOG also seeks to facilitate transportation for those without transit access who cannot otherwise attend. Samples of SACOG publicity materials are included in Appendix F.

Transportation Information

As described in more detail in the LEP Plan (Appendix B), SACOG provides key transportation information in languages other than English on its 511 website, www.sacregion511.org, through automated browser language identification, as well as by the 511 phone line in Spanish. SACOG also makes its website accessible to those who are blind or visually impaired. SACOG as a practice selects public hearing and community workshop locations that are accessible to those who are dependent upon transit and/or have disabilities.

MTP/SCS Implementation Activities and Studies

SACOG is also engaged in a variety of activities to help implement the 2016 MTP/SCS and continue to enhance our understanding and capacity for addressing transportation and equity

issues. The following is a summary of the many projects SACOG is engaged in as part of these efforts:

Enhanced Transportation Access/Connectivity

Older Adult Transportation and Age-Friendly Communities: Funded through a Caltrans discretionary planning grant, this regional study examined aging in the SACOG region, and models for improving transportation services and supports to keep older adults as independent and healthy as possible as they age.

Rural and Disadvantaged Ride-Sharing Alternatives Planning Study: Through a Caltrans grant, SACOG staff is undertaking a planning study of alternatives for transportation services in rural and disadvantaged portions of the region where public transit is extremely costly, limited or non-existent.

Connect Card: SACOG has been leading implementation of the Connect Card, which launched in June 2017. The Connect Card is a single fare card that facilitates transit use across nine transit systems in the region. A retail network has been developed for obtaining and reloading Connect Cards, and a marketing and educational effort is on-going in order to reach the largest number of existing and prospective transit users.

Regional Bikeshare Project: SACOG staff has been spearheading the development of a regional bikeshare system. An early program launched in Fall 2017. An electric bikeshare (e-bike) program is slated to begin operations in May 2018 in three cities, and anticipated to be expanded over time. The project included an equity analysis to determine how best to provide bikeshare access to low-income residents. SACOG staff are currently working with our e-bike vendor on the low-income pricing level. An additional grant received by SACOG from Caltrans is for assessing how the Connect Card can be extended for use on the bikeshare system and for light rail station park-and-ride lots to facilitate “first mile/last mile” connections.

Active Transportation

Safe Routes to School Education and Encouragement Project: SACOG received grant funding to work with community partners and schools to support and expand Safe Routes to School (SRTS) programs in the region. SACOG convened a Summit in 2015 with partners from various schools and organizations on solutions to encourage more children to walk and bike to school. Other grant work included providing SACOG staff support on school walk audits, creating maps of bike/ped infrastructure gaps to support planning and building of projects to promote SRTS, working with schools that have existing encouragement programs to promote May is Bike Month, creating and managing an SRTS website to make information and resources available to partners, and discussing how to integrate SRTS efforts with SACOG’s regional Transportation Demand Management program to create some ongoing capacity to continue to reduce vehicle trips related to school pick-ups/drop-offs.

Regional Bicycle, Pedestrian and Trails Master Plan: SACOG finished an update of the regional Bicycle, Pedestrian and Trails Master Plan in Spring 2015, with help from member

jurisdictions and the Bicycle and Pedestrian Advisory Committee. Projects in the plan are eligible for SACOG regional funding. The next update of the plan is slated to begin in Spring 2018.

Bicycling Data Collection Project: With grant funding, SACOG is developing a pilot program to collect expanded data from bicycle riders about their routes and experiences to help inform bicycle infrastructure planning and guide future regional funding rounds for bicycle projects.

Active Transportation Program: This regional funding program was implemented collaboratively between SACOG, El Dorado County Transportation Commission (EDCTC), and Placer County Transportation Planning Agency (PCTPA), and an 11-member multidisciplinary Working Group, comprised of volunteers with expertise in bicycle and pedestrian transportation, engineering, public health, Safe Routes to School, transit, air quality, community groups, and land use planning. The most recent regional funding awarded \$7,031,000 to four regionally significant projects.

Active Design/Transportation Technical Assistance: Through grant funding from the California Strategic Growth Council (SGC), SACOG began offering a program of technical assistance to our member agencies. Portland State University's Urban Sustainability Accelerator (USA) Program has been providing technical assistance to cities and counties in the region on specific priority local projects that would revitalize or infill an area in a downtown/core area or major corridor. In February 2017 SACOG launched a Complete Streets Corridor Working Group, composed of city and county public works and planning staff from interested jurisdictions, with sessions designed to help jurisdictions overcome challenges to retrofitting infill corridors as complete streets. SACOG also worked with the Center for Public Interest Design (CPID) to identify strategic opportunities for improving disadvantaged neighborhoods, transit stops, and street infrastructure, with specific efforts to engage community-based organizations and residents in identifying issues and design solutions.

Technical Advisory Committees and Community Partnerships

SACOG staff are often invited to participate in advisory committees for efforts seeking to improve neighborhoods and transportation options. Recent examples include participating in advisory groups for:

- Choice Neighborhood planning projects to revitalize three older public housing developments in Sacramento.
- Projects to redesign North 12th Street and design a new light rail station by Twin Rivers, a Choice Neighborhood site.
- A complete streets planning effort for the Broadway corridor, which borders another Choice Neighborhood area.
- Grid 3.0, a study to facilitate vehicle travel, transit, biking and walking in downtown Sacramento.
- Efforts in South Sacramento to assess community and transportation needs and potential new shuttle or other options.

- Supporting the local transit agency in exploring bus and light rail shelter improvements, and looking for opportunities to bring transit to the Franklin Blvd. area of South Sacramento.
- Working with the Healthy Sacramento Coalition to target community outreach to encourage active transportation.

Section C. Subrecipient Agreements and Monitoring JARC/New Freedom Program Administration

SACOG was the designated recipient in the Sacramento Urbanized Area for grant funds from the now-terminated JARC and New Freedom programs. As required by FTA program guidance (FTA Circulars 9050.1 and 9045.1, respectively), SACOG administered JARC and New Freedom grants according to a Program Management Plan (PMP) submitted to FTA, and complied with all Title VI provisions. The last remaining funds will be expended by June 30, 2018.

Subrecipient Agreements and Monitoring

FTA subrecipients to SACOG are required to enter into agreements with SACOG for projects where SACOG partners with or passes through funds. Recipients have to comply with all pertinent federal requirements, including but not limited to Title VI, and provide quarterly reporting of project progress and performance. Chapter VI of the Circular requires MPOs administering grants to assist subrecipients in complying with the general reporting requirements in Chapter III of 4702.1B, and to monitor subrecipients for compliance with Title VI, documenting their processes for ensuring that all subrecipients are complying with the general reporting requirements of the Circular and, at the request of FTA, requesting subrecipients to verify that their level and quality of service is provided on an equitable basis.

SACOG includes the following language in all contracts with subrecipients of FTA programs:

Subrecipient and its contractors and subcontractors shall comply with all provisions prohibiting discrimination on the basis of race, color, or national origin of Title VI of the Civil Rights Act of 1964, as amended, 42 U.S.C. §§ 2000d, et seq., with U.S. D.O.T. regulations, “Nondiscrimination in Federally-Assisted Programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act”, 49 C.F.R. Part 21, and with any applicable implementing Federal directives that may be issued. Title VI provides that the recipients of federal assistance will implement and maintain a policy of nondiscrimination in which no person shall, on the basis of race, color, ancestry, national origin, religion, religious creed, sex, age, or disability, be excluded from participation in, denied the benefits of, or subject to discrimination under any program or activity by the recipients of federal assistance or their assignees and successors in interest.

SACOG reviews Title VI reports of all transit operators who receive FTA funds. SACOG reviews the FTA TrAMS system to track when Title VI program updates are due from all transit operators who are required to submit them, and offers to review draft reports prior to their completion by the transit agencies and their submission to FTA.

Subrecipient Assistance

SACOG has fulfilled several requests from subrecipients for assistance with Title VI requirements, including data and examples of Title VI reporting. SACOG's own Title VI complaint procedures are posted on the SACOG website. Demographic information for the SACOG region, broken out by race and income, is on our website for subrecipients' reference, and assistance with demographic and LEP information has been and will continue to be supplied by SACOG's Regional Information Resources Center staff as needed.

Section D. Program-Specific Reporting Requirements

This chapter provides information under the “program-specific guidance” (Chapter VI) of the FTA Circular. The FTA recommends that MPOs have an analytical basis in place for certifying their compliance with Title VI. Examples of this analysis can include: a) A demographic profile of the metropolitan area that includes identification of the locations of socio-economic groups, including low-income and minority populations as covered by the Executive Order on Environmental Justice and Title VI; b) A metropolitan planning process that identifies the needs of low-income and minority populations; and c) An analytical process that identifies the benefits and burdens of metropolitan transportation system investments for different socioeconomic groups, identifying imbalances and responding to the analyses produced.

Demographic Profile of the Sacramento Region

SACOG conducted a robust environmental justice/equity analysis (Chapter 8) as part of the 2016 MTP/SCS. SACOG also conducted a Title VI analysis of the MTP/SCS per FTA guidance. SACOG did not identify disparate impacts based on race, color or national origin.

For the analysis for the 2016 MTP/SCS, SACOG identified the locations of low-income and high minority (LIHM) populations in the region, using 2010 Census and five-year rolling American Community Survey data.

Table 2 Minority Population in the SACOG Region, 2000-2013

	Total Minority Population 2000 Census	Total Minority Population 2010 Census	Total Minority Population ACS 2009- 13
El Dorado	15%	20%	20%
Placer	17%	24%	25%
Sacramento	42%	52%	52%
Sutter	40%	50%	50%
Yolo	42%	50%	51%
Yuba	35%	41%	42%
Region	36%	44%	45%

Source: U.S. Census Data

SACOG staff worked with the stakeholder Sounding Board to confirm the following definitions for Low Income High Minority (LIHM) Areas for the MTP/SCS equity analysis:

- **Low-Income Communities:** Block Groups where 45 percent or more of the population lives at 200 percent or less of the federal poverty level, based on 2009-2013 ACS data. This uses the more specific block group geography rather than larger census tracts to assess more precisely the areas with higher concentrations of poverty.
- **Minority Communities:** Census Block Groups where 70 percent or more of the population is Asian Pacific Islander, African American, Hispanic, Native American or other Non-White ethnic group, using newer 2009-2013 ACS data rather than the previous 2010 Census.
- **Vulnerable Communities:** Block groups in the region that, when compared with the regional average, are in the top quintile on at least four of these five vulnerability measures:
 - Housing cost burden: percent of renter- and owner-occupied housing units paying more than 50 percent of household income in housing costs.
 - Single parent households: percent of family households with their own children under age 18 with a single householder.
 - Older population: percentage of population aged 75 and older.
 - Educational attainment: percentage of population 25 years and older with less than a high school degree.
 - Linguistic isolation: percent of households where English is not the primary language and is not spoken very well.

This third criterion added to LIHM Areas block groups totaling about 6,000 people. Combined, the total population of the resulting LIHM Areas was about 32 percent of the total regional population.

Figure 1 is a map comparing 2012 and 2016 areas for EJ analysis. Table 3 shows the difference in the proportion of households analyzed by county between the 2012 and 2016 plans for the base year, and plan end years of 2035/2036. .

Table 3. Proportion of households for environmental justice analysis, 2012 vs. 2016

County	Year	2012	2016	Total	Year	2012	2016
El Dorado	2012	0%	3%	Region	2012	25%	32%
	2035	0%	3%		2035	25%	33%
	2036	0%	3%		2036	25%	33%
Placer	2012	0%	7%				
	2035	0%	6%				
	2036	0%	6%				
Sacramento	2012	32%	38%				
	2035	33%	41%				
	2036	32%	41%				
Sutter	2012	37%	41%				
	2035	31%	35%				
	2036	32%	36%				
Yolo	2012	27%	45%				
	2035	26%	44%				
	2036	26%	47%				
Yuba	2012	43%	45%				
	2035	45%	42%				
	2036	44%	42%				

Source: ACS

Figure 1: Areas for Environmental Justice Analysis

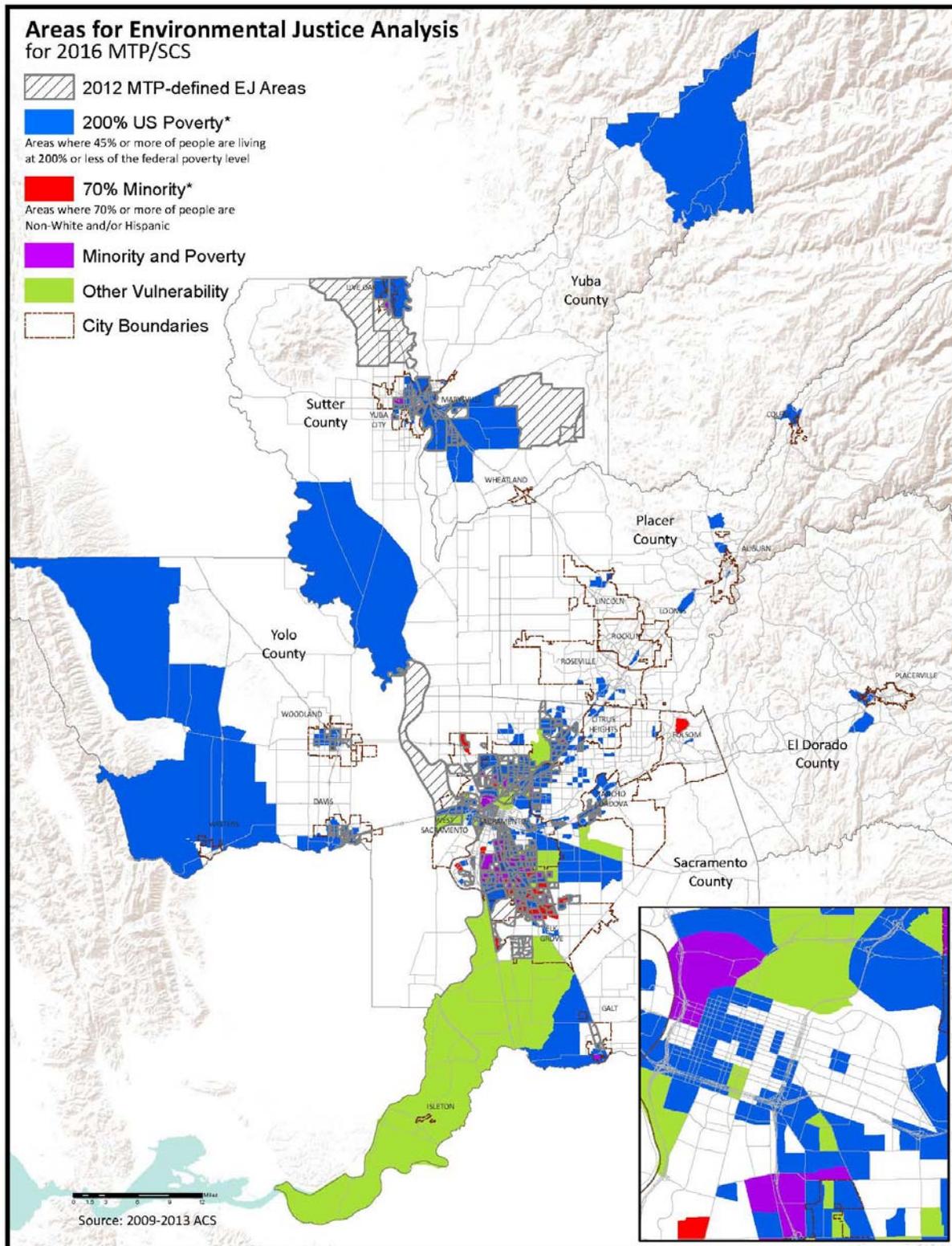


Table 4 provides a demographic profile of the communities of concern (COC) for the 2016 environmental justice analyses.

Table 4: Demographic Information for Communities of Concern (COC) vs. Non-COC Areas

	Basic Census Statistics for Environmental Justice Analysis Areas									
	Persons per household	Persons living in households earning less than 200% of federal poverty level	White	Black	American Indian/Alaskan Native	Asian	Native Hawaiian/Other Pacific Islander	Other Race	Two or More races	Hispanic or Latino
El Dorado County (part)										
COC Areas	2.9	49.7%	72%	2%	1%	1%	0%	0%	2%	21%
Non-COC Areas	2.7	19.0%	83%	1%	1%	4%	0%	0%	3%	9%
Placer County (part)										
COC Areas	2.8	54.0%	63%	1%	1%	2%	0%	0%	3%	30%
Non-COC Areas	2.7	18.3%	77%	1%	0%	7%	0%	0%	3%	11%
Sacramento County										
COC Areas	2.9	55.0%	34%	14%	1%	15%	1%	0%	5%	30%
Non-COC Areas	2.6	24.2%	58%	7%	0%	14%	1%	0%	4%	16%
Sutter County										
COC Areas	3.1	58.8%	38%	1%	1%	14%	0%	0%	4%	41%
Non-COC Areas	2.8	29.1%	60%	2%	1%	14%	0%	0%	4%	19%
Yolo County										
COC Areas	2.7	52.3%	42%	2%	0%	16%	1%	0%	4%	35%
Non-COC Areas	2.8	26.8%	54%	3%	1%	10%	0%	0%	4%	28%
Yuba County										
COC Areas	3.1	62.0%	48%	3%	1%	1%	0%	1%	5%	34%
Non-COC Areas	2.8	30.9%	67%	3%	1%	1%	0%	0%	4%	18%
Region										
COC Areas	2.9	55.2%	37%	11%	1%	14%	1%	0%	4%	31%
Non-COC Areas	2.7	23.0%	64%	4%	1%	11%	0%	0%	4%	16%

* Does not include Lake Tahoe portions of either county.

Identifying the Needs of Low-Income and High Minority Populations

SACOG maintains a commitment to improving our tools and capacity to analyze equity impacts of the MTP/SCS and to improve transportation planning and choices for low-income and minority populations. As described, SACOG undertook a significant community engagement process to identify stakeholder priorities and help inform the 2016 MTP/SCS update.

Developing an Analytical Basis for Equity Analysis

In Summer 2015, SACOG undertook the equity/environmental justice analysis of the 2016 MTP/SCS update, including performance and impacts on EJ Areas/communities of concern. SACOG reviewed performance measures for this analysis with the Sounding Board, using the following measures:

Indicator	Specific Measures
Land Use	Percent of LIHM Area and Non-LIHM Area population in Community Types Percent of LIHM Area and Non- LIHM Area population in Transit Priority Areas by county
Housing	Housing product mix in LIHM and Non- LIHM Areas by Community Type
Transit service	Increases in daily transit vehicle service hours in LIHM Areas
Transit accessibility	Accessibility from LIHM and Non- LIHM Areas within 30 minutes by transit to jobs, retail jobs, health care, higher education, park acres
Mode share	LIHM and Non-LIHM Area transit mode share Bike and Walk mode share in LIHM and Non- LIHM Areas
Auto accessibility	Accessibility from LIHM and Non- LIHM Areas within 30 minutes by car to jobs, retail jobs, health care, higher education, park acres
Comparison of transit and auto accessibility	Percent of jobs, retail jobs, health care, higher education enrollments, park acres Accessible within 30 minutes by transit vs. car from LIHM and Non-LIHM Areas
Toxic air contaminants	Percent of population in LIHM and Non-LIHM areas within 500 feet of high-volume roadway by county, region
Active Transportation	Proportion of LIHM and non-LIHM Area population achieving over 30 minutes of physical activity via their transportation.

Staff continues to expand in the MTP/SCS monitoring metrics that can assess performance measures and improvements in the region over time.

SACOG staff has also provided support for member agencies competing for funds for transportation projects benefiting disadvantaged areas/communities of concern. Staff has provided assistance to applicants for State Active Transportation Program funds for bicycle and pedestrian improvement projects, including analyzing awards from the inception of the funding program in 2014, and how our region could better compete in the state's funding cycles. Staff has also been closely monitoring the state Cap and Trade program as well as new SB 1 funded

programs that provide funding for active transportation projects, with both funding programs placing a heavy emphasis on projects for disadvantaged communities, and how funds can be won for the region. SB 1 also provides for a large infusion of funding for expansion of public transit services.

Staff has also continued to refine SACOG's own regional funding programs to assess how projects benefit communities of concern. Staff has also begun work to identify opportunity areas for more complete streets, and revise funding program criteria to support the infrastructure improvements needed to offer better options for walking, bicycling and accessing public transit. .

APPENDICES

APPENDIX A – SACOG Title VI Complaint Procedure



Title VI Complaint Procedure

As a recipient of federal dollars, SACOG is required to comply with Title VI of the Civil Rights Act of 1964 and ensure that services and benefits are provided on a non-discriminatory basis. SACOG has implemented this Title VI Complaint Procedure, which outlines a process for local disposition of Title VI complaints and is consistent with guidelines found in the Federal Transit Administration Circular 4702.1B, dated October 1, 2012.

The complaint procedure has five steps, outlined as follows:

1. **Submission of Complaint:** Any person who feels that he or she, individually, or as a member of any class of persons, on the basis of race, color, national origin, or low-income status has been excluded from or denied the benefits of, or subjected to discrimination under any program or activity receiving federal financial assistance through SACOG may file a written complaint with SACOG's Title VI Coordinator either on-line or in hard copy. Such complaint must be filed within 180 calendar days after the date the person believes the discrimination occurred.
 - o [SACOG's Title VI Complaint Form](#)
 - o [Formulario de Queja del Título VI de SACOG](#)
 - o [SACOG標題VI投訴表格](#)
2. **Referral to Review Officer:** Upon receipt of a Complaint, the Title VI Coordinator shall appoint one or more staff review officers, as appropriate, to evaluate and investigate the Complaint, in consultation with Legal Counsel. The staff review officer(s) shall complete their review no later than 60 calendar days after the date SACOG received the Complaint. If more time is required, the Title VI Coordinator shall notify the Complainant of the estimated time-frame for completing the review. Upon completion of the review, the staff review officer(s) shall make a recommendation regarding the merit of the Complaint and whether remedial actions are available to provide redress. Additionally, the staff review officer(s) may recommend improvements to SACOG's processes relative to Title VI and environmental justice, as appropriate. The staff review officer(s) shall forward their recommendations to the Title VI Coordinator, for concurrence. If s/he concurs, s/he shall issue SACOG's written response to the Complainant.
3. **Request for Reconsideration:** If the Complainant disagrees with the response, he or she may request reconsideration by submitting the request, in writing, to the SACOG Chief Executive Officer within 10 calendar days after its receipt. The request for reconsideration shall be sufficiently detailed to contain any items the Complainant feels were not fully understood by the Title VI Coordinator or staff review officer(s). The Chief Executive Officer will notify the Complainant of his decision either to accept or reject the request for reconsideration within 10 calendar days. In cases where the Chief

Executive Officer agrees to reconsider, the matter shall be returned to the staff review officer(s) to re-evaluate in accordance with Paragraph 2, above.

4. Appeal: If the request for reconsideration is denied, the Complainant may appeal the Chief Executive Officer's response to the Complaint by submitting a written appeal to the SACOG Board of Directors no later than 10 calendar days after receipt of the Chief Executive Officer's written decision rejecting reconsideration.
5. Submission of Complaint to the Federal Transit Administration: You may also file a complaint directly with the Federal Transit Administration at FTA Office of Civil Rights, 1200 New Jersey Ave. SE, Washington, DC 20590.

APPENDIX B – SACOG LEP Plan

**SACOG Plan for
Special Language Services to
Limited English Proficient (LEP) Populations
May 2018**

Presidential Executive Order 13166 requires federal agencies to implement measures to ensure that people who speak limited English have meaningful access to programs and activities that are conducted and/or funded by the federal government, consistent with Title VI of the Civil Rights Act of 1964. Both the U.S. Department of Transportation (US DOT) and Federal Transit Administration (FTA) have implemented guidance or directives in furtherance of Executive Order 13166.

In compliance with guidance and rules issued by US DOT, and Title VI of the Civil Rights Act of 1964, SACOG continues to take reasonable steps to ensure that all persons have meaningful access to its programs, services, and information, at no additional cost. This document is SACOG's Plan for Special Language Services to Limited English Proficient (LEP) Populations, referred to as the LEP Plan. In order to prepare this LEP Plan, SACOG undertook the US DOT's four-factor LEP analysis, which considers the following:

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 SACOG programs, activities or services
3. The importance to LEP Persons of SACOG's program, activities and services
4. The resources available to SACOG and overall cost to provide LEP assistance.

SACOG is the metropolitan planning organization (MPO) for the Sacramento region. SACOG's service area includes six counties and 22 cities, with a population of 2.2 million in a range of urban, suburban, and rural settings. The population is increasingly diverse, with a portion speaking a language other than English.

In addition to this LEP Plan, a separate but related document, SACOG's Public Participation Plan, also lays out ways in which SACOG seeks broad public participation in SACOG's work and the transportation planning process. SACOG's current Public Participation Plan is included as Appendix D.

Part 1. Determination of Need

Factor 1: Number and proportion of LEP persons served or encountered

The following tables, drawn from American Community Survey (ACS) data for 2011-2015, identify those who speak English "less than very well" as Limited English Proficient persons.

Table 1 shows, by county, the ability to speak English and languages spoken at home for persons five years of age and older. The six most frequently spoken languages in the region other than English are Spanish (12.95 percent), Chinese (1.99 percent), Russian (1.36 percent), Tagalog (1.46 percent), Vietnamese (1.16 percent) and Hmong (1.07 percent). However, many of these people also speak English very well. Table 2 shows that Spanish-speakers are the only population representing more than 5 percent of any individual county's population, or of the region's population, that is identified as not speaking English very well.

Table 1 Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over

	El							
	Dorado County	Placer County	Sacramento County	Sutter County	Yolo County	Yuba County	SACOG Region	Percent
Total:	173716	345965	1366795	88685	195167	67372	2,237,700	100.00%
Speak only English	150968	294071	935666	55719	123868	51112	1,583,660	70.77%
Speak Other than English	22,748	51,894	431,129	32,966	71,299	16,260	654,040	29.23%
Spanish or Spanish Creole:	12805	24264	180867	18678	41634	11536	289,784	12.95%
Speak English "very well"	7811	15898	108849	10529	24369	6836	174,292	7.79%
Speak English less than "very well"	4994	8366	72018	8149	17265	4700	115,492	5.16%
French (incl. Patois, Cajun):	650	1148	2971	108	648	50	5,575	0.25%
Speak English "very well"	534	999	2434	85	608	50	4,710	0.21%
Speak English less than "very well"	116	149	537	23	40	0	865	0.04%
French Creole:	19	29	331	18	0	5	402	0.018%
Speak English "very well"	19	29	278	18	0	0	344	0.015%
Speak English less than "very well"	0	0	53	0	0	5	58	0.003%
Italian:	284	740	1872	49	267	203	3,415	0.153%
Speak English "very well"	262	584	1497	39	252	186	2,820	0.126%
Speak English less than "very well"	22	156	375	10	15	17	595	0.027%
Portuguese or Portuguese Creole:	144	607	2544	123	1032	116	4,566	0.204%
Speak English "very well"	101	392	1753	89	824	14	3,173	0.142%
Speak English less than "very well"	43	215	791	34	208	102	1,393	0.062%
German:	705	1782	3557	222	561	77	6,904	0.309%
Speak English "very well"	630	1532	3071	207	482	59	5,981	0.267%
Speak English less than "very well"	75	250	486	15	79	18	923	0.041%
Yiddish:	0	29	17	0	0	0	46	0.002%
Speak English "very well"	0	18	17	0	0	0	35	0.002%
Speak English less than "very well"	0	11	0	0	0	0	11	0.000%
Other West Germanic languages:	107	285	908	163	127	0	1,590	0.071%
Speak English "very well"	95	257	830	163	127	0	1,472	0.066%
Speak English less than "very well"	12	28	78	0	0	0	118	0.005%
Scandinavian languages:	74	441	435	0	117	41	1,108	0.050%

Speak English "very well"	74	430	425	0	117	41	1,087	0.049%
Speak English less than "very well"	0	11	10	0	0	0	21	0.001%
Greek:	102	193	1486	15	78	35	1,909	0.085%
Speak English "very well"	99	193	1204	9	68	35	1,608	0.072%
Speak English less than "very well"	3	0	282	6	10	0	301	0.013%
Russian:	512	2022	24382	402	3020	61	30,399	1.36%
Speak English "very well"	281	1443	11393	284	1378	37	14,816	0.66%
Speak English less than "very well"	231	579	12989	118	1642	24	15,583	0.70%
Polish:	29	162	504	33	52	22	802	0.036%
Speak English "very well"	29	108	313	26	40	22	538	0.024%
Speak English less than "very well"	0	54	191	7	12	0	264	0.012%
Serbo-Croatian:	0	175	1170	11	133	0	1,489	0.067%
Speak English "very well"	0	128	716	11	118	0	973	0.043%
Speak English less than "very well"	0	47	454	0	15	0	516	0.023%
Other Slavic languages:	109	635	11071	37	637	19	12,508	0.559%
Speak English "very well"	109	466	4887	22	390	4	5,878	0.263%
Speak English less than "very well"	0	169	6184	15	247	15	6,630	0.296%
Armenian:	80	64	3166	0	63	0	3,373	0.151%
Speak English "very well"	72	50	1699	0	17	0	1,838	0.082%
Speak English less than "very well"	8	14	1467	0	46	0	1,535	0.069%
Persian:	1266	1436	6898	342	1386	54	11,382	0.509%
Speak English "very well"	621	1080	4579	189	1120	46	7,635	0.341%
Speak English less than "very well"	645	356	2319	153	266	8	3,747	0.167%
Gujarati:	122	311	1333	5	234	54	2,059	0.092%
Speak English "very well"	122	184	925	5	164	30	1,430	0.064%
Speak English less than "very well"	0	127	408	0	70	24	629	0.028%
Hindi:	830	853	13364	234	1639	33	16,953	0.758%
Speak English "very well"	720	572	9282	135	1314	33	12,056	0.539%
Speak English less than "very well"	110	281	4082	99	325	0	4,897	0.219%
Urdu:	302	102	2960	267	329	6	3,966	0.177%
Speak English "very well"	302	76	2042	163	196	0	2,779	0.124%
Speak English less than "very well"	0	26	918	104	133	6	1,187	0.053%

Other Indic languages:	259	1841	17825	9656	2205	102	31,888	1.43%
Speak English "very well"	242	1183	10009	4638	1107	44	17,223	0.77%
Speak English less than "very well"	17	658	7816	5018	1098	58	14,665	0.66%
Other Indo-European languages:	273	786	5794	40	355	0	7,248	0.324%
Speak English "very well"	244	429	3332	33	120	0	4,158	0.186%
Speak English less than "very well"	29	357	2462	7	235	0	3,090	0.138%
Chinese:	739	2222	32880	382	7601	765	44,589	1.99%
Speak English "very well"	438	1127	11855	232	3852	400	17,904	0.80%
Speak English less than "very well"	301	1095	21025	150	3749	365	26,685	1.19%
Japanese:	176	719	4203	225	463	78	5,864	0.262%
Speak English "very well"	111	420	2460	116	270	56	3,433	0.153%
Speak English less than "very well"	65	299	1743	109	193	22	2,431	0.109%
Korean:	85	1132	5851	91	1506	79	8,744	0.391%
Speak English "very well"	40	378	2674	76	893	35	4,096	0.183%
Speak English less than "very well"	45	754	3177	15	613	44	4,648	0.208%
Mon-Khmer, Cambodian:	42	115	2094	0	321	17	2,589	0.116%
Speak English "very well"	31	45	900	0	202	0	1,178	0.053%
Speak English less than "very well"	11	70	1194	0	119	17	1,411	0.063%
Hmong:	0	266	21341	370	215	1814	24,006	1.07%
Speak English "very well"	0	201	11755	244	126	1037	13,363	0.60%
Speak English less than "very well"	0	65	9586	126	89	777	10,643	0.48%
Thai:	106	206	1148	0	187	124	1,771	0.079%
Speak English "very well"	65	82	517	0	26	111	801	0.036%
Speak English less than "very well"	41	124	631	0	161	13	970	0.043%
Laotian:	37	72	3743	64	393	72	4,381	0.196%
Speak English "very well"	17	66	1689	30	171	53	2,026	0.091%
Speak English less than "very well"	20	6	2054	34	222	19	2,355	0.105%
Vietnamese:	380	1304	22069	259	1733	167	25,912	1.16%
Speak English "very well"	71	621	8936	149	959	72	10,808	0.48%
Speak English less than "very well"	309	683	13133	110	774	95	15,104	0.67%
Other Asian languages:	478	991	12472	45	1326	36	15,348	0.686%
Speak English "very well"	443	711	8249	45	1036	13	10,497	0.469%

Speak English less than "very well"	35	280	4223	0	290	23	4,851	0.217%
Tagalog:	1148	4574	24334	677	1430	432	32,595	1.46%
Speak English "very well"	842	3158	15539	462	943	269	21,213	0.95%
Speak English less than "very well"	306	1416	8795	215	487	163	11,382	0.51%
Other Pacific Island languages:	455	690	6814	166	390	130	8,645	0.386%
Speak English "very well"	344	302	4249	111	286	95	5,387	0.241%
Speak English less than "very well"	111	388	2565	55	104	35	3,258	0.146%
Navajo:	0	0	43	7	16	0	66	0.003%
Speak English "very well"	0	0	36	7	16	0	59	0.003%
Speak English less than "very well"	0	0	7	0	0	0	7	0.000%
Other Native North American languages:	28	66	297	20	56	0	467	0.021%
Speak English "very well"	28	66	288	20	21	0	423	0.019%
Speak English less than "very well"	0	0	9	0	35	0	44	0.002%
Hungarian:	43	179	237	0	31	0	490	0.022%
Speak English "very well"	34	179	143	0	22	0	378	0.017%
Speak English less than "very well"	9	0	94	0	9	0	112	0.005%
Arabic:	93	912	5644	155	401	56	7,261	0.324%
Speak English "very well"	76	608	3390	92	235	34	4,435	0.198%
Speak English less than "very well"	17	304	2254	63	166	22	2,826	0.126%
Hebrew:	163	99	421	0	121	0	804	0.036%
Speak English "very well"	88	86	404	0	116	0	694	0.031%
Speak English less than "very well"	75	13	17	0	5	0	110	0.005%
African languages:	18	176	3740	73	568	46	4,621	0.207%
Speak English "very well"	18	176	2391	73	458	46	3,162	0.141%
Speak English less than "very well"	0	0	1349	0	110	0	1,459	0.065%
Other and unspecified languages:	85	266	343	29	24	30	777	0.035%
Speak English "very well"	85	126	216	29	24	0	480	0.021%
Speak English less than "very well"	0	140	127	0	0	30	297	0.013%

less than very well

Source: 2011-2015 Census American Community Survey (ACS) Table B16001

Table 2 – Populations speaking English Less than “Very Well” by County and Regionally

County	Speaks English Less than "Very Well"						Total Speaking English Less than "Very Well"	Total Speaks English "Very Well"	Total Speaks Only English	Total
	Spanish	Chinese	Russian	Vietnamese	Hmong	All other languages				
El Dorado	4,994	301	231	309	0	1,815	7,650	15,098	150,968	173,716
	2.87%	0.17%	0.13%	0.18%	0.00%	1.04%	4.40%	8.69%	86.91%	100.00%
Placer	8,366	1,095	579	683	65	6,703	17,491	34,403	294,071	345,965
	2.42%	0.32%	0.17%	0.20%	0.02%	1.94%	5.06%	9.94%	85.00%	100.00%
Sacramento	72,018	21,025	12,989	13,133	9,586	57,152	185,903	245,226	935,666	1,366,795
	5.27%	1.54%	0.95%	0.96%	0.70%	4.18%	13.60%	17.94%	68.46%	100.00%
Sutter	8,149	150	118	110	126	5,982	14,635	18,331	55,719	88,685
	9.19%	0.17%	0.13%	0.12%	0.14%	6.75%	16.50%	20.67%	62.83%	100.00%
Yolo	17,265	3,749	1,642	774	89	5,313	28,832	42,467	123,868	195,167
	8.85%	1.92%	0.84%	0.40%	0.05%	2.72%	14.77%	21.76%	63.47%	100.00%
Yuba	4,700	265	24	95	777	741	6,602	9,658	51,112	67,372
	6.98%	0.39%	0.04%	0.14%	1.15%	1.10%	9.80%	14.34%	75.87%	100.00%
Region	115,492	26,685	15,583	15,104	10,643	77,706	261,113	365,183	1,611,404	2,237,700
	5.16%	1.19%	0.70%	0.67%	0.48%	3.47%	11.67%	16.32%	72.01%	100.00%

Source: 2011-2015 Census American Community Survey (ACS) Table B16001

Factor 2: Frequency of LEP populations' contact with programs, activities, services.

SACOG's experience with LEP populations has been primarily with Spanish speakers. However, SACOG has also made an effort to reach out to speakers of Asian and Eastern European language to gather input for the updates of the Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) and in other transit studies and planning work.

Outreach print materials for unmet transit needs hearings, MTP/SCS workshops, and other key community input meetings have regularly been translated into Spanish. Some meetings have been conducted entirely in Spanish; at other times, simultaneous translation into Spanish has been provided. SACOG has also worked with a community-based organization, Asian Resources, Inc., to provide translation into Mandarin, Vietnamese, and Russian upon request.

Factor 3: Importance to LEP population of programs, services, activities.

SACOG is not a direct provider of transportation services, but instead every four years creates the MTP/SCS, a 20-year or longer plan for transportation facilities, programs and services across the region. Because of the long-term nature of SACOG's MTP/SCS planning, it has often been difficult to engage LEP populations in providing input.

However, some of SACOG's programs have a more immediate reach, including annual hearings to identify unmet transit needs in Sacramento, Sutter, Yolo and Yuba counties; the region's 511 traveler information system; and motorist-aid call boxes. These routinely include support for languages other than English.

Factor 4: Resources available to SACOG and overall cost to provide LEP assistance.

SACOG provides publicity in Spanish for unmet transit needs hearings and offers translation into any language upon request to allow LEP populations to participate. SACOG has also offered translation services upon request for community workshops to develop the region's long-range transportation plan. However, there has not been significant demand from LEP residents to participate in these discussions, unless SACOG actively works with community-based organizations to recruit participants from their LEP constituency and provide on-site language support. To the extent possible, SACOG staff goes out to other organization's meetings, but unfortunately, the resources for doing this type of intensive outreach are very limited.

SACOG's Public Information & Media Affairs Coordinator speaks fluent Spanish, answers calls from the main telephone line that come in in Spanish, and has an outgoing voicemail message in both English and Spanish. This staff member is also competent in American Sign Language. Several other staff members also speak Spanish, two staff members speak Hindi, one speaks

Gujarati, another speaks Korean, and two other staff members are fluent in Chinese. Several SACOG staff members are proficient enough in Spanish to help translate some written materials, or outside translation services are procured. However, in some cases, the cost to implement multiple language programs, especially to provide translated materials or simultaneous translation, is significant and unfunded.

Part 2. Implementation Plan on Language Assistance

1. Identifying LEP persons who need language assistance

As noted above, the most significant group requiring language assistance has been the Hispanic/Latino population, with 5.16 percent of the region's Spanish-speaking population speaking English less than very well, which is a .3% decrease from the previous five year period. However, SACOG has also sought to identify other groups needing language assistance. Although they represent one percent or less of the region's population, those who speak Hmong, Vietnamese, Russian, and Chinese without speaking English very well still represent, approximately, 10,000 to 27,000 people in the region. SACOG continues to monitor the needs of LEP persons, and to design its communications and public participation efforts to include people regardless of language barriers.

2. Providing language assistance

SACOG has used a number of techniques or practices to provide meaningful opportunities for LEP residents to access transportation-related information and provide input that informs key decisions, including the following:

Transportation Information

- SACOG's 511 website for traffic, transit, rideshare and bicycling information can be accessed in all languages supported by automatic browser language preference detection, including Spanish, Russian, Chinese and Vietnamese.
- By dialing 511, telephone information on transportation services in the Sacramento region is available in Spanish.
- SACOG staff has produced and distributed transportation resource sheets to agencies working with low-income and LEP populations in the various counties in the region, including where to find transit information in languages other than English.

- With support from a Caltrans transportation planning grant, SACOG produced and continues to distribute copies of a multilingual DVD in Spanish, Cantonese, Vietnamese, Hmong and Russian on using transit, bicycling, walking, and carpooling in the region. The video also has an accompanying information sheet in each language. The video and information sheet is also accessible in all of these languages through the 511 website.
- SACOG contracts with the company that answers freeway call boxes and insures that translation assistance for any language is available for motorists using call boxes, and through call box answering center personnel.
- SACOG routinely creates publicity materials for annual Unmet Transit Needs hearings in both English and Spanish. Hearings are held in at least five locations in Sacramento, Yolo, Yuba and Sutter counties, and translation is provided upon request. Spanish-speakers with comments by phone are directed to a voicemail box with a Spanish greeting, and written or email comments are accepted in any language.
- Most of the region's transit operators already provide transit service information in Spanish. Sacramento Regional Transit also has an arrangement with a translation service for callers in any language. Transit operators are also increasingly including Google Translator or automatic browser language preference detection on their web pages, to provide translation of their transit information into any language. SACOG also maintains an awareness and sensitivity to LEP needs in developing Short Range Transit Plans for transit agencies in the region, including creating on-board surveys in languages other than English as needed, and developing new transit marketing strategies and recommendations for reaching relevant LEP populations in the transit operator's area.

Regional Transportation Planning

- SACOG provided opportunities for public input at several stages of development of the 2016 MTP/SCS, adopted in February 2016, and will continue to do so during the update process of the next MTP/SCS. SACOG has publicized community workshops through outreach materials in English and Spanish. Staff leveraged relationships with community-based organizations that serve LEP populations to support outreach and participation in the workshops. Translation services are always offered upon request.
- All MTP/SCS workshops had Spanish-speaking staff and materials available in Spanish. Additionally, a Spanish online workshop and survey were available and promoted in Spanish through electronic communications and social media.

SACOG plans to continue such measures to insure that those with limited English proficiency can obtain information about transportation services in the region, provide meaningful comment on public transit services, and participate in SACOG's transportation planning work.

3. Training staff

Many of SACOG's staff have experience communicating in an ethnically diverse environment. A number come to the job with multi-lingual skills. Agency training and internal planning will continue to note the need to consider persons with limited English proficiency in communicating transportation information, and providing or partnering for language assistance for LEP persons to support and encourage their participation in the MTP/SCS planning process.

Given the proliferation of smart phones and expansion of internet access, even among low-income populations, SACOG is continuing to explore opportunities to use more online community education and engagement tools that allow people to participate in the planning process without having to physically attend workshops or meetings, and whether those tools can use automatic translation technology or otherwise be cost-effectively translated into Spanish or other non-English languages.

4. Providing notice to LEP persons

SACOG will continue to inform the public and LEP persons of their rights under Title VI in a number of ways:

- Notification of Title VI rights on SACOG's website in English, Spanish, and Chinese (the second most prominent non-English language in the region), with automatic translation of all pages based on the user's browser language preferences.
- Complaint procedures and forms translated into Spanish and Chinese that are posted on SACOG's website and available through SACOG's offices.
- Routine use of both English and Spanish on printed or electronic announcements for Unmet Transit Needs Hearings and public workshops on key planning efforts that alert interested individuals on how to request translation services.

5. Monitoring/updating the plan

While maintaining a basic level of access by LEP populations to SACOG transportation information and services, and public input opportunities into key planning decisions, SACOG will monitor demographic shifts and translation requests and adjust practices to meet demand. SACOG's LEP Plan will be updated periodically as needed to reflect significant changes.

APPENDIX C – Examples of Beneficiary Notifications

APPENDIX D – SACOG Public Participation Plan, 2013

APPENDIX E – MTP/SCS Chapter on Planning Process

APPENDIX F – Subrecipient Management

APPENDIX G – MTP/SCS Chapter on Equity and Choice

APPENDIX H – Demographics of Transit Related Non-Elected Committees

APPENDIX I – Title VI Document Tracking



SACRAMENTO AREA COUNCIL OF GOVERNMENTS

RESOLUTION NO. 46 – 2018

**APPROVING SACOG 2018 TITLE VI PROGRAM REPORT AND
LIMITED ENGLISH PROFICIENCY PLAN**

WHEREAS, the Federal Transit Administration (FTA) requires MPOs to report every three years on their compliance with Title VI of the Civil Rights Act; and

WHEREAS, Title VI and its implementing regulations require that FTA funding recipients take responsible steps to ensure equal access to all programs and services regardless of participant race, color or national origin, and provide meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP); and

WHEREAS, as a recipient of FTA funds, SACOG is subject to these requirements and must submit a Title VI Program Report and Plan for Special Language Services to Limited English Proficient Populations to FTA; and

WHEREAS, SACOG has developed a 2018 Title VI Program Report and Limited English Proficiency (LEP) Plan meeting the requirements of the U.S. Department of Transportation Federal Transit Administration Circular 4702.1B;

NOW THEREFORE, BE IT RESOLVED, that the Board hereby approves the 2018 SACOG Title VI Program Report and LEP Plan for submission to FTA.

PASSED AND ADOPTED THIS 17th day of May 2018, by the following vote of the SACOG Board of Directors:

AYES: NOES:

ABSTAIN:

ABSENT:

Jay Schenirer
Chair

James Corless
Chief Executive Officer