

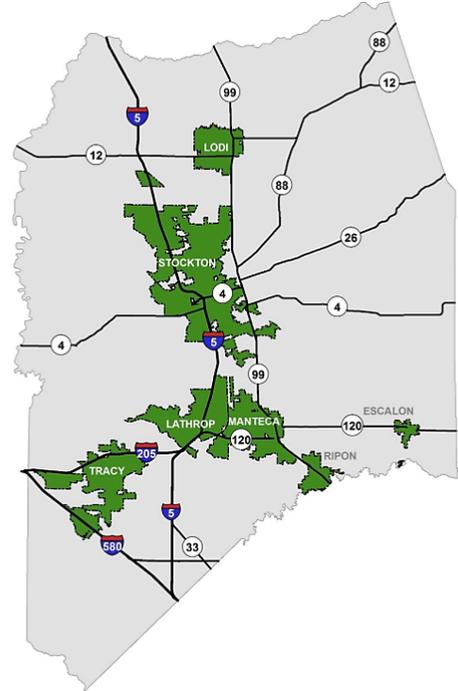
SAN JOAQUIN COUNCIL OF GOVERNMENTS

LIMITED ENGLISH PROFICIENCY PLAN

Introduction

The San Joaquin Council of Governments (SJCOG) is the transportation planning, coordinating, and financing agency for the San Joaquin region. SJCOG also is the regions federally designated metropolitan planning organization (MPO). As such, it is subject to meeting the requirements under the Title VI of the Civil Rights Act of 1964 (Title VI), and Executive Order 13166 to provide meaningful access to its services, programs and activities to persons with limited English proficiency. This document, or Limited English Proficiency (LEP) Plan, is intended to ensure that SJCOG’s language assistance measures reflect the needs of LEP persons across the San Joaquin region.

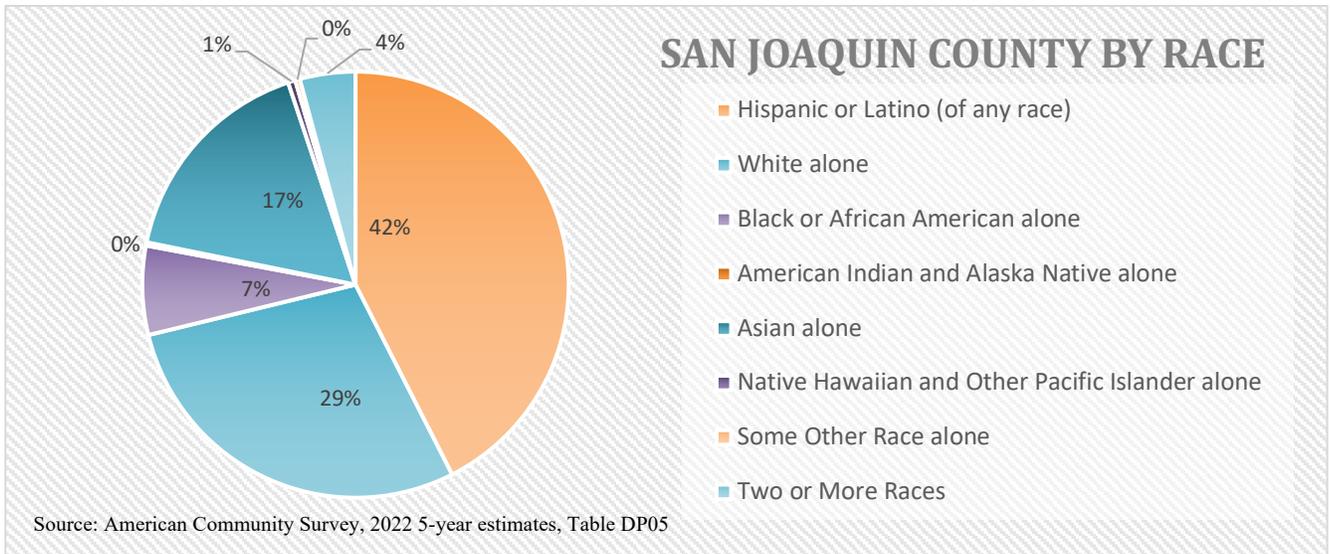
Figure 1. San Joaquin County Map



Demographics

SJCOG’s service area includes San Joaquin County and the cities of Escalon, Lathrop, Lodi, Manteca, Ripon, Stockton, and Tracy, with a population of 779,445. (American Community Survey (ACS 5-Year Estimates Data Profiles-DP05) San Joaquin County make up is a combination of urban, suburban, and rural settings. The population is increasingly diverse, with a portion speaking a language other than English as reflected in Figure 2 below.

Figure 2. San Joaquin County by Race



The LEP Plan describes how to identify individuals who may need language assistance, methods to provide such assistance, staff training, and how to provide notification to LEP individuals impacted or encountered during the planning and development process.

Purpose

The main objective of this plan is to ensure that community members throughout the San Joaquin region have the opportunity to participate in the transportation planning and decision-making process. In addition to this LEP Plan, a separate but related document, SJCOG's Public Participation Plan (PPP), also lays out ways in which SJCOG seeks broad public participation in our Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and in other studies and planning work. Together these Plans work together to enhance the public participation process for San Joaquin residents.

The Public Participation Plan, and any updates, can be accessed via the following link, <https://www.sjco.org/127/Public-Participation-Plan>.

Who is a Limited English Proficient Individual?

As defined by the US Government (<https://www.lep.gov/commonly-asked-questions>) an LEP individual is described as, individuals for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. This Plan is intended to ensure that SJCOG's language assistance measures reflect the needs of LEP persons across the San Joaquin region.

Guiding Policies

Title VI and Executive Order 13166

Two federal documents provide the foundation for the development of the LEP plan: Title VI of the Civil Rights Act of 1964, and Executive Order 13166 "Improving Access to Services for Persons with Limited English Proficiency," signed in 2000.

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., and its implementing regulations state, "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

The Supreme Court, in *Lau v. Nichols*, 414 U.S. 563 (1974), interpreted Title VI regulations promulgated by the former Department of Health, Education, and Welfare to hold that Title VI prohibits conduct that has a disproportionate effect on LEP individuals because such conduct constitutes national origin discrimination.

In August 2000, President Bill Clinton issued Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency," which directs Federal agencies to examine the services they provide to ultimately develop and implement a system by which LEP individuals can meaningfully access those services (see Appendix G: References).

This Executive Order states,

“Each Federal Agency shall prepare a plan to improve access to its federally conducted programs and activities by eligible LEP persons. Each plan shall be consistent with the standards set forth in the LEP Guidance and shall include the steps the agency will take to ensure that eligible LEP persons can meaningfully access the agency’s programs and activities.”

On October 25, 2001, President George W. Bush affirmed his commitment to Executive Order 13166 through a memorandum issued by Assistant Attorney General for Civil Rights, Ralph F. Boyd, Jr. Federal agencies were directed to provide guidance and technical assistance to recipients of Federal funds as to how they can provide meaningful access to limited English proficient individuals of Federal programs.

Policy Guidance from U. S. Department of Transportation

On December 14, 2005, in accordance with Executive Order 13166, the DOT issued its Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient Persons. This document states, “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 Limited English Proficient 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.”

Adopting the framework established by the Department of Justice in its August 11, 2000 Guidance, the DOT identifies four factors that should be considered by a recipient of federal funds in assessing the needs of LEP persons and for implementing a plan to address those needs. These four factors consider the following:

FACTOR 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by SJCOG;

FACTOR 2: The frequency with which LEP individuals come in contact with SJCOG’s programs, activities, or services.

FACTOR 3: The nature and importance of SJCOG’s programs, activities, or services to LEP person’s lives; and

FACTOR 4: The resources available to SJCOG and the costs associated to provide language assistance.

Four Factor LEP Analysis for SJCOG

The following is an assessment of needs in the San Joaquin region in relation to the four factors and the transportation planning process.

1. The number or proportion of LEP persons in the service area.

In order to gain a comprehensive understanding of the profile of individuals that may be participating in the transportation planning process, SJCOG examines the 2022 ACS demographic

data for the San Joaquin region. For the purpose of this LEP Plan, individuals who identified themselves during the survey as speaking a language other than English (Table B16001) are considered LEP individuals. This LEP Plan addresses only LEP individuals and specifically identifies the three most common languages spoken in the San Joaquin region.

According to Table B16001 from the U.S. Census Bureau, 2018-2022 American Community Survey 5-Year Estimates, 43.41 percent of the county’s 742,018 residents, over the age of 5, spoke a language other than English at home. Approximately 27.88 percent of those speak Spanish, followed by 3.14 percent Tagalog and 2.25 percent Punjabi. This is a shift from the last assessment where Spanish, Tagalog, and Khmer were the top three languages identified. However, Spanish speakers remain the largest limited English-speaking populations followed by Tagalog speakers and now Punjabi, speakers. Recognizing such a sizeable proportion of residents are Spanish speakers and that on occasion Tagalog or Punjabi speakers will also need assistance, SJCOG has developed processes aimed at improving communication and outreach.

Table 1: San Joaquin County Population Estimates Based on Languages Spoken

Language Spoken	Estimate	Percent
Speak only English	419,931	56.59%
Spanish	206,877	27.88%
Tagalog (incl. Filipino)	23,330	3.14%
Punjabi	16,681	2.25%
Khmer	7,733	1.04%
Vietnamese	7,544	1.02%
Chinese (incl. Mandarin, Cantonese)	7,482	1.01%
Other*	52,440	7.07%
Total	742,018	100.00%

*For a full list of languages please refer to the original source below, or see Attachment A
Source: 2022 ACS 1-year estimate, Table B16001: Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over

2. The frequency with which LEP individuals come into contact with the programs/ activities.

SJCOG oversees numerous projects throughout the community and in various neighborhoods. SJCOG’s prior experience with LEP populations has been primarily with Spanish speakers. This is consistent with the identified majority of LEP individuals as Spanish language speakers above. In developing long range transportation plans and other transportation planning activities, SJCOG gathers input from a range of minority and low-income residents from community-based organizations. Some of these documents and planning activities include but are not limited to the Regional Transportation Plan/Sustainable Communities Strategies (RTP/SCS), Unmet Transit Needs (UTN), and public notices and hearings, most of which are translated in Spanish. Planning material and outreach materials on these efforts and others are often translated into Spanish to actively engage and involve residents who often do not participate in regional government planning activities.

3. The nature and importance of service provided by SJCOG

SJCOG undertakes a variety of planning and policy initiatives to encourage a more sustainable region now and in the future. To that end, SJCOG assists with regional transportation and land use planning. Under federal and state mandates, SJCOG is tasked with developing a RTP and a Federal Transportation Improvement Program (FTIP) every four years. With the passage of California's SB 375 into state law, SJCOG has also been given the added responsibility of developing a SCS to address greenhouse gas emissions as an element of the RTP. Evaluating the impact of proposed transportation investments on the underserved and underrepresented community groups is a significant step in developing a comprehensive transportation investment plan. As a result, SJCOG takes appropriate steps during the planning and public outreach process to invite all members of the community in the public participation process, including reaching out to the LEP community. This ensures a variety of input from all stakeholders and community members and ensures that every effort is taken to make the planning process as inclusive as possible.

4. The resources available to the recipient of the federal funds to assure meaningful access to the service by LEP persons

In the San Joaquin region, SJCOG is committed to including all residents in the transportation and decision-making process, specifically those from the Spanish, Tagalog, or Punjabi speaking communities. As such, a variety of resources and strategies are currently employed to cater to the immediate LEP needs, and to include others who represent LEP interests at regional decision-making tables, on advisory groups, and citizen panels from across the region.

SJCOG provides publicity in Spanish for public hearings/public notices pertaining to the RTP/SCS, UTN process, Public Participation Plan, and LEP/Title VI documents. Agendas include a statement regarding the availability of language assistance upon request.

A web-based translation tool is available on the SJCOG website, which translates web content into a variety of different languages including Spanish. LEP individuals can request that vital documents or portions thereof be translated into Spanish, Tagalog, or Punjabi.

SJCOG staff works with the El Concilio and Coalition of Mexican American organizations, both large umbrella groups for the Hispanic, Latino, and Spanish speaking communities. SJCOG staff periodically attends monthly meetings of these groups to solicit input and comments on various planning activities/programs. Staff also works with the Asian-American Chamber of Commerce, representing Asian-owned businesses and entrepreneurs, and community service providers such as Asian Pacific Self-Development and Residential Association (APSARA) and Lao-Khmu, serving Stockton's Cambodian, Khmer-speaking community.

Additionally, staff reaches out to Latino Times, Bilingual News, and Asian American news outlets as well news organizations that reach out to LEP communities to make sure stories about the organization's projects and public notices are accessible to those who are limited English proficient. SJCOG has staff members who are fluent enough in Spanish to help translate some written materials and/or read comments received in Spanish. Staff members also answers calls from the main telephone line that come in in Spanish. In some cases, outside translation services are procured. However, in most cases, the cost to implement multiple language programs, especially to provide translated materials or simultaneous translation is significant and unfunded.

Four Factor Analysis Conclusion

SJCOG determined that translation of Vital Documents and access to services should be provided

in the Spanish language as a matter of course. Upon request, and subject to available resources, SJCOG will provide translation to Tagalog and Punjabi languages. Based on the above Four Factor Analysis findings, SJCOG developed *Vital Document Guidelines* to advise staff on agency protocol for document translation (see Attachment C).

Safe Harbor Provision

As a recipient of federal funding, SJCOG is required by the Federal law's "Safe Harbor" provision to undertake reasonable efforts to provide translation of vital written documents, as needed. The written translation need is based on each eligible LEP language group that constitutes 5 percent or 1,000 individuals, whichever is less, of the population eligible to be served or likely to be affected or encountered.

The safe harbor provision does not affect the requirement to provide meaningful access to LEP individuals through oral interpreters, when oral language services are needed and are reasonable.

Translation of documents, if needed, can be provided orally. The failure to provide written translations under the circumstances outlined above does not mean there is noncompliance. Instead, the safe harbor provisions provide a guide to enhance compliance requirements than can be provided by a fact-intensive, four factor analysis.

Current Language Assistance Measures

As part of SJCOG's evaluation of its prior experiences with LEP persons, the agency developed an inventory of language assistance services currently being provided.

SJCOG currently offers a wide range of tools for LEP populations, including written and oral language assistance, as well as community outreach and local media engagement. These language assistance tools and strategies are detailed below:

Written Language Assistance

- Translate selected RTP outreach materials into Spanish language or as requested.
- Provide RTP Executive Summary in English and Spanish language.
- Translate surveys, public notices, and press releases into Spanish on a routine basis.
- Utilize third-party, multi-lingual website translation services (e.g., Google Translate) to translate online content for various SJCOG programs and services.
- Advertise notice of availability of Spanish translation for SJCOG meetings.
- Advertise key opportunities for public participation in Spanish community newspapers.
- Avoid overly complex or technical terms and write in clear, compelling language in a style appropriate to the intended audience.
- Oral Language Assistance

- Employ a multi-lingual staff member who speaks Spanish for on-the-spot interpreter assistance (e.g. to assist callers who speak Spanish).
- Spanish speaking translators available upon request for meetings and workshops.
- Develop partnerships with advocates of LEP persons.
- Partner with community non-profits that can assist in tailoring presentations, meeting materials and meeting announcements.
- Local LEP participants Media and Public Relations
- Place notices in non-English language community newspapers to announce important opportunities for public participation.
- Work with non-English language media outlets (print or electronic media) to place articles or public service announcements about SJCOG’s work or announce participation opportunities.
- Current staff awareness of language assistance guidelines detailing agency protocol on how to interact and provide services to LEP populations.

Future Language Assistance Measures

SJCOG has identified additional language assistance services that may be implemented to further provide meaningful access to LEP persons. These suggestions for future language assistance services are based on interviews with community-based organizations and best practices reviews from similar regional MPO agencies. Moreover, these suggestions take into account agency resources and staff time. Future outreach efforts to LEP populations that SJCOG will consider include the following:

- Request public service announcements in non-English language community newspapers, radio stations, or television stations to announce public meetings for the long-range regional transportation plan, major corridor studies, or to announce other important transportation news.
- Expand current mechanisms for SJCOG staff to document LEP participation at SJCOG hosted meetings and events.
- Increase staff awareness of the availability of translated materials.
- Provide financial assistance (in response to competitive requests for proposals) to community-based organizations that work with LEP persons for such activities as co-hosting and conducting meetings in multiple languages and assistance with identifying LEP individuals for participation in community focus groups or public meetings.
- Use I-Speak language cards to identify languages spoken by communities.

Plan Monitoring and Updating

SJCOG will monitor and update its LEP Plan, as needed, to ensure meaningful access to its programs and services by LEP persons. SJCOG will use a combination of qualitative and quantitative approaches to monitor whether the LEP services effectively meets the needs of LEP persons across the San Joaquin region. Every four years, SJCOG will review demographic data of the region's LEP populations and solicit feedback from SJCOG staff, LEP persons and community-based organizations serving LEP individuals to evaluate the effectiveness of its LEP. By establishing an evaluative review of the LEP Plan, SJCOG can assess whether its language assistance services are effective and have impacted relations with LEP communities. SJCOG will monitor its implementation plan by soliciting regular feedback from staff and third-party contractors, community-based organizations and LEP persons.

In compliance with U.S. DOT guidelines, SJCOG will monitor and evaluate its LEP Plan by reviewing the following information:

- Changes in the number and proportion of LEP persons in the SJCOG service area
- New demographic data from U.S. Census and ACS
- Changes in the frequency of contact with LEP language groups (e.g., translated website page views)
- Nature and importance of programs, services and activities to LEP persons
- Expansion of services and programs
- Changes in the availability of resources, including technological advances and/or identification of additional financial resources
- The effectiveness of current language assistance measures in meeting the needs of LEP persons
- Feedback from LEP persons on the effectiveness of current language assistance services
- Staff knowledge and understanding of the LEP Plan and how to implement the plan
- The effectiveness of staff LEP training and agency-wide language assistance protocol (e.g., "Vital Documents Guidelines")

In addition, SJCOG provides staff and all new hires information on Title VI requirements, including information on how to provide language assistance to an LEP caller or visitor. Staff who routinely field telephone calls from the public have developed protocols for assisting Spanish speakers. In addition, SJCOG has developed a short list of approved, on-call translators for additional assistance if needed.

[Attachment A: Table B16001 Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over](#)

[Attachment B: Title VI Complaint Form – English and Spanish](#)

[Attachment C: Vital Documents Guidelines](#)

[Attachment D: San Joaquin Council of Governments Title VI Complaint Procedures](#)

[Attachment E: Title VI Public Notice – English and Spanish](#)

[Attachment F: I-Speak Language Cards](#)

[Attachment G: Reference](#)

Attachment A: Table B16001 Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over

Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over		United States [®] Census Bureau
Note: The table shown may have been modified by user selections. Some information may be missing.		
DATA NOTES		
TABLE ID:	B16001	
SURVEY/PROGRAM:	American Community Survey	
VINTAGE:	2022	
DATASET:	ACSDT1Y2022	
PRODUCT:	ACS 1-Year Estimates Detailed Tables	
UNIVERSE:	Population 5 years and over	
MLA:	U.S. Census Bureau. "Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over." American	
FTP URL:	None	
API URL:	https://api.census.gov/data/2022/acs/acs1	
USER SELECTIONS		
GEOS	San Joaquin County, California	
TABLES	B16001	
TOPICS	Language Spoken at Home	
EXCLUDED COLUMNS		
	None	
APPLIED FILTERS		
	None	
APPLIED SORTS		
	None	
PIVOT & GROUPING		
PIVOT COLUMNS	None	
PIVOT MODE	Off	
ROW GROUPS	None	
VALUE COLUMNS	None	
WEB ADDRESS		
	https://data.census.gov/table/ACSDT1Y2022.B16001?q=San%20Joaquin%20County,%20b16001&t=Language%20Spoken%20at%20Home	
TABLE NOTES		
	Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, the decennial census is the official source of population totals for April 1st of each decennial year. In between censuses, the Census Bureau's Population Estimates Program produces and disseminates the official estimates of the population for the nation, states, counties, cities, and towns and estimates of housing units for states and counties.	
	Information about the American Community Survey (ACS) can be found on the ACS website. Supporting documentation including code lists, subject definitions, data accuracy, and statistical testing, and a full list of ACS tables and table shells (without estimates) can be found on the Technical Documentation section of the ACS website.	
	Sample size and data quality measures (including coverage rates, allocation rates, and response rates) can be found on the American Community Survey website in the Methodology section.	
	Source: U.S. Census Bureau, 2022 American Community Survey 1-Year Estimates	
	Data are based on a sample and are subject to sampling variability. The degree of uncertainty for an estimate arising from sampling in 2016, changes were made to the languages and language categories presented in tables B16001, C16001, and B16002. For more information, see: 2016 Language Data User note.	
	The 2022 American Community Survey (ACS) data generally reflect the March 2020 Office of Management and Budget (OMB) delineations of metropolitan and micropolitan statistical areas. In certain instances the names, codes, and boundaries of the principal cities shown in ACS tables may differ from the OMB delineations due to differences in the effective dates of the geographic entities.	
	Estimates of urban and rural populations, housing units, and characteristics reflect boundaries of urban areas defined based on 2020 Census data. As a result, data for urban and rural areas from the ACS do not necessarily reflect the results of ongoing urbanization.	

	<p>Explanation of Symbols:- The estimate could not be computed because there were an insufficient number of sample observations. For a ratio of medians estimate, one or both of the median estimates falls in the lowest interval or highest interval of an open-ended distribution. For a 5-year median estimate, the margin of error associated with a median was larger than the median itself. N The estimate or margin of error cannot be displayed because there were an insufficient number of sample cases in the selected geographic area. (X) The estimate or margin of error is not applicable or not available. median- The median falls in the lowest interval of an open-ended distribution (for example "2,500-") median+ The median falls in the highest interval of an open-ended distribution (for example "250,000+"). ** The margin of error could not be computed because there were an insufficient number of sample observations. *** The margin of error could not be computed because the median falls in the lowest interval or highest interval of an open-ended distribution. ***** A margin of error is not appropriate because the corresponding estimate is controlled to an independent population or housing estimate. Effectively, the corresponding estimate has no sampling error and the margin of error may be treated as zero.</p>
COLUMN NOTES	None

Table: ACSDT1Y2022.B16001

	San Joaquin County, California	
Label	Estimate	Margin of Error
Total:	742,018	±543
Speak only English	419,931	±11,102
Spanish:	206,877	±8,375
Speak English "very well"	123,431	±6,625
Speak English less than "very well"	83,446	±6,634
French (incl. Cajun):	1,080	±444
Speak English "very well"	1,028	±433
Speak English less than "very well"	52	±87
Haitian:	0	±218
Speak English "very well"	0	±218
Speak English less than "very well"	0	±218
Italian:	857	±586
Speak English "very well"	555	±413
Speak English less than "very well"	302	±407
Portuguese:	2,166	±830
Speak English "very well"	1,881	±855
Speak English less than "very well"	285	±236
German:	675	±291
Speak English "very well"	612	±290
Speak English less than "very well"	63	±107
Yiddish, Pennsylvania Dutch or other West Germanic languages:	141	±183
Speak English "very well"	141	±183
Speak English less than "very well"	0	±218
Greek:	863	±601
Speak English "very well"	548	±537
Speak English less than "very well"	315	±299
Russian:	944	±695
Speak English "very well"	518	±503
Speak English less than "very well"	426	±481
Polish:	186	±308
Speak English "very well"	186	±308
Speak English less than "very well"	0	±218
Serbo-Croatian:	62	±105
Speak English "very well"	0	±218
Speak English less than "very well"	62	±105
Ukrainian or other Slavic languages:	0	±218
Speak English "very well"	0	±218

Table: ACSDT1Y2022.B16001

	San Joaquin County, California	
Label	Estimate	Margin of Error
Speak English less than "very well"	0	±218
Armenian:	0	±218
Speak English "very well"	0	±218
Speak English less than "very well"	0	±218
Persian (incl. Farsi, Dari):	2,678	±1,622
Speak English "very well"	2,094	±1,443
Speak English less than "very well"	584	±477
Gujarati:	540	±559
Speak English "very well"	321	±340
Speak English less than "very well"	219	±341
Hindi:	3,865	±1,708
Speak English "very well"	3,117	±1,565
Speak English less than "very well"	748	±490
Urdu:	6,236	±2,485
Speak English "very well"	3,617	±1,606
Speak English less than "very well"	2,619	±1,244
Punjabi:	16,681	±4,954
Speak English "very well"	9,250	±3,469
Speak English less than "very well"	7,431	±2,070
Bengali:	448	±385
Speak English "very well"	340	±274
Speak English less than "very well"	108	±138
Nepali, Marathi, or other Indic languages:	571	±460
Speak English "very well"	358	±351
Speak English less than "very well"	213	±304
Other Indo-European languages:	1,712	±895
Speak English "very well"	826	±485
Speak English less than "very well"	886	±627
Telugu:	6,944	±2,895
Speak English "very well"	5,656	±2,497
Speak English less than "very well"	1,288	±791
Tamil:	1,144	±927
Speak English "very well"	1,027	±869
Speak English less than "very well"	117	±143

Table: ACSDT1Y2022.B16001

	San Joaquin County, California	
Label	Estimate	Margin of Error
Malayalam, Kannada, or other Dravidian languages:	1,483	±837
Speak English "very well"	1,483	±837
Speak English less than "very well"	0	±218
Chinese (incl. Mandarin, Cantonese):	7,482	±1,849
Speak English "very well"	2,398	±1,078
Speak English less than "very well"	5,084	±1,390
Japanese:	325	±232
Speak English "very well"	259	±207
Speak English less than "very well"	66	±113
Korean:	218	±241
Speak English "very well"	45	±76
Speak English less than "very well"	173	±229
Hmong:	4,807	±2,119
Speak English "very well"	3,635	±2,020
Speak English less than "very well"	1,172	±632
Vietnamese:	7,544	±2,837
Speak English "very well"	2,870	±1,543
Speak English less than "very well"	4,674	±1,773
Khmer:	7,733	±2,615
Speak English "very well"	3,043	±1,179
Speak English less than "very well"	4,690	±1,853
Thai, Lao, or other Tai-Kadai languages:	4,060	±2,012
Speak English "very well"	2,534	±1,369
Speak English less than "very well"	1,526	±842
Other languages of Asia:	926	±810
Speak English "very well"	439	±448
Speak English less than "very well"	487	±385
Tagalog (incl. Filipino):	23,330	±4,864
Speak English "very well"	13,432	±3,093
Speak English less than "very well"	9,898	±2,311
Ilocano, Samoan, Hawaiian, or other Austronesian languages:	2,530	±1,151
Speak English "very well"	1,224	±757
Speak English less than "very well"	1,306	±791
Arabic:	3,432	±1,845
Speak English "very well"	1,890	±1,319
Speak English less than "very well"	1,542	±844
Hebrew:	0	±218
Speak English "very well"	0	±218
Speak English less than "very well"	0	±218
Amharic, Somali, or other Afro-Asiatic languages:	550	±556
Speak English "very well"	317	±383
Speak English less than "very well"	233	±243
Yoruba, Twi, Igbo, or other languages of Western Africa:	2,370	±1,793
Speak English "very well"	1,466	±1,192
Speak English less than "very well"	904	±745

Table: ACSDT1Y2022.B16001

	San Joaquin County, California	
Label	Estimate	Margin of Error
Swahili or other languages of Central, Eastern, and Southern Africa:	0	±218
Speak English "very well"	0	±218
Speak English less than "very well"	0	±218
Navajo:	29	±50
Speak English "very well"	0	±218
Speak English less than "very well"	29	±50
Other Native languages of North America:	54	±88
Speak English "very well"	54	±88
Speak English less than "very well"	0	±218
Other and unspecified languages:	544	±457
Speak English "very well"	323	±277
Speak English less than "very well"	221	±371

Attachment B: Title VI Complaint Form – English and Spanish



SAN JOAQUIN COUNCIL OF GOVERNMENTS

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San Joaquin Council of Government (SJCOC) Title VI Complaint Form

Complaints must be filed within 180 days of the alleged act of discrimination.

Section I:					
Name:					
Address:					
Telephone (Home):			Telephone (Work):		
Email Address:					
Accessible Format Requirements: (Check all that apply)		Large Print	Audio Tape	TDD	Other
Section II:					
Are you filing this complaint on your own behalf?		Yes*		No	
*If you answered "yes" to this question, go to Section III.					
If not, please supply the name and relationship of the person for whom you are complaining:					
Please explain why you have filed for the third party:					
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party		Yes		No	
Section III:					
I believe the discrimination I experienced was based on (check all that apply):					
Race []		Color []		National Origin []	
Date of Alleged Discrimination (Month, Day, Year):					
In the space below, what happened and why you believe you were discriminated against. Describe all persons who were involved. Include name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.					

Section IV:		
Have you previously filed a Title VI complaint with this agency?	Yes	No
Section V:		
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?		
Yes <input type="checkbox"/>	No <input type="checkbox"/>	If yes, check all that apply:
<input type="checkbox"/> Federal Agency:	<input type="checkbox"/> State Agency:	<input type="checkbox"/> Local Agency:
<input type="checkbox"/> Federal Court:	<input type="checkbox"/> State Court:	
Please provide information about a contact person at the agency/court where the complaint was filed:		
Name:	Title:	
Agency:	Phone:	
Address:		
Section VI:		
Name of agency complaint is against:		
Contact Person:		
Title:		
Phone:		
You may attach any written materials or other information that you feel is relevant to your complaint.		
Signature and date required below:		
Signature:	Date:	
Please submit this form by email to info@sjcog.org or by mail to: San Joaquin Council of Governments Title VI Coordinator 555 East Weber Avenue Stockton, CA 95202		



SAN JOAQUIN COUNCIL OF GOVERNMENTS

555 E. Weber Avenue • Stockton, California 95202

209.235.0600 • 209.235.0438 (fax)

www.sjcog.org

San Joaquin Consejo de Gobierno (SJCOC) Titulo VI Queja Forma

Queja debe ser presentada dentro de 180 días del presunto acto de discriminacion.

Sección I:					
Nombre:					
Direccion:					
Telefono (Casa):		Telefono (Trabajo):			
Correo Electronico:					
Requisitos de format accesible: (Marque todos que aplican) * Dispositivo de telecomunicaciones para personas sordas.		Letra de gran tamaño	Cinta de audio	TDD*	Otro
Sección II:					
¿Está presentando esta denuncia en su nombre?		Sí*		No	
* Si contestaste "sí" a esta pregunta, vaya a la sección III.					
Si no, por favor suministrar el nombre y la relación de la persona para quien se queja:					
Por favor explique por qué han presentado para el tercero:					
Por favor confirme que ha obtenido el permiso de la parte agraviada si está presentando en nombre de un tercero		Sí		No	
Sección III:					
Creo que la discriminación que viví fue basada en (marque todos que aplican):					
Raza []		Color []		Nacionalidad []	
Fecha de la supuesta discriminación (mes, día, año):					
En el siguiente espacio, explique lo más claramente posible lo que sucedió y por qué usted cree que fue discriminado. Describa todas las personas que participaron. Incluya los nombres e información de contacto de las personas que lo/a discriminó (si se conoce) así como los nombres y la información de contacto de cualquier testigo. Si necesita más espacio, use el dorso de este formulario.					

Sección IV:		
¿Usted ha presentado anteriormente una queja del título VI con esta agencia?	Sí	No
Sección V:		
¿Se presentó esta queja con cualquier otro Federal, estado o agencia local o con cualquier Tribunal Federal o estatal?		
Sí <input type="checkbox"/>	No <input type="checkbox"/>	En caso afirmativo, marque todas las que aplican:
<input type="checkbox"/> Agencia Federal para el:	<input type="checkbox"/> Estado Agencia:	<input type="checkbox"/> Agencia local de:
<input type="checkbox"/> Tribunal Federal de:	<input type="checkbox"/> Estado de corte:	
Sírvanse facilitar información sobre una persona de contacto en la Agencia/corte donde fue la denuncia:		
Nombre:	Título:	
Agencia:	Telefono:	
Direccion:		
Sección VI:		
Nombre de denuncia de la agencia esta en contra de:		
Persona de contacto:		
Titulo:		
Telefono:		
Puede conectar cualquier material escrito u otra información que es relevante a su queja.		
Firma y fecha especificadas a continuación:		
Firma:	Fecha:	
Por favor, envíe este formulario (en persona o por correo) para: San Joaquin Consejo de Gobiernos Coordinador del título VI 555 East Weber Avenue Stockton, CA 95202		

Attachment C: Vital Document Guidelines

Vital Document Guidelines

The San Joaquin Council of Governments (SJCOG) is committed to full compliance with Title VI of the Civil Rights Act of 1964 (Title VI) and Executive Order 13166 to provide meaningful access by ensuring effective communication exists between the project, activity, or services and individuals with limited English proficiency (LEP). In accordance with the United States Department of Transportation (U.S.DOT) guidelines, SJCOG must determine which “Vital Documents” should be translated into the languages that meet SJCOG’s translation threshold.

To assist staff in determining the critical information and documents for translation, SJCOG has developed “Vital Documents Guidelines.” Classification of a document as “vital” depends upon the importance of the program, information, service, or encounter involved, and the consequence to the LEP person if the information in question is not provided accurately or in a timely manner.

Categories of Vital Documents

SJCOG’s Vital Documents have been defined as follows:

1. Any document that is critical for obtaining services and benefits.

Classification of a document as “vital” depends upon the importance of the program, information, service, or encounter involved, and the consequence to the LEP person if the information in question is not provided accurately or in a timely manner.

2. Any document that is required by law.

The importance of SJCOG documents to LEP persons varies depending on multiple factors including time-sensitivity and impact on legal rights. SJCOG has ranked Vital Documents into three tiers, according to the definition above. SJCOG will re-evaluate these tiers on an on-going basis as language assistance demands and needs evolve.

Although a document may be classified as “vital”, SJCOG is not required to provide a word- for word translation. Instead, a summary of relevant information may be sufficient. The decision to translate Vital Documents will be weighed against available resources and staff capacity. SJCOG will continue to revise these guidelines as the agency updates its LEP Plan.

Tier 1: Critical documents

Tier 1 documents are the agency’s highest priority. SJCOG will translate Tier 1 Vital Documents into Spanish without request. Tier 1 documents include:

- Documents that, without translation, would seriously impede access by LEP persons to SJCOG services or programs.
- Documents which, without translation, would deprive LEP persons of an awareness of their legal rights, particularly rights to language assistance.

Tier 1 documents include Title VI information, legal and public hearing notices, and select information for SJCOG services such as:

- Notification to beneficiaries of protection under Title VI
- Title VI complaint forms

- Documents which would have life-threatening consequences, if not translated, such as information on construction projects that include information on construction safety and impacts.

Tier 2: Documents that will enhance access to SJCOG services and programs

Tier 2 documents include information that will enhance or facilitate the customer experience for LEP individuals. SJCOG will translate any Tier 2 Vital Document into Spanish upon request, though some Tier 2 Vital Documents, at SJCOG's discretion and subject to available resources, will be translated without request. These documents could include the following:

- General SJCOG information
- Meeting announcements, agenda packets and other information for SJCOG Board Committee Meetings

Tier 3: Documents that will enhance and support participation of LEP persons in transportation decision-making

Tier 3 includes documents that encourage LEP persons to participate in SJCOG transportation planning efforts. SJCOG will translate any Tier 3 Vital Document into Spanish upon request, though some Tier 3 Vital Documents, at SJCOG's discretion and subject to available resources, will be translated without request. These documents may include the following:

- Information regarding long-range, regional transportation planning
- Long-term plans regarding transportation funding investments
- Environmental Impact Reports
- Legal notices published in newspapers announcing public comment periods on various documents or for other planning-related programs.

Attachment D: San Joaquin Council of Governments Title VI Complaint Procedures

San Joaquin Council of Governments Title VI Complaint Procedures

Title VI of the Civil Rights Act of 1964 (Title VI) prohibits discrimination on the basis of race, color, or national origin in programs and activities from agencies receiving federal financial assistance. The law aims to ensure that individuals are not excluded from participation, denied benefits, or subjected to discrimination based on these protected characteristics. Recipients of federal funds must take affirmative steps to eliminate discrimination and promote equal opportunity. Any person who feels he or she, as individuals, or as a member of any class of persons, on the basis of race, color, or natural origin has been excluded from or denied benefits of, or been subjected to discrimination under a program or activity offered through SJCOG, may file a written complaint with the SJCOG Deputy Director/Chief Finance Officer.

Such complaint must be filed within 180 days of the date the person believes the discrimination took place. SJCOG will promptly investigate all signed, written complaints; complaints with incomplete information may result in delayed investigations and responses.

The following procedures will be followed to investigate formal Title VI complaints:

I. Referral to Review Officer

Upon receipt of the Complaint, the Deputy Executive Director shall appoint one or more staff members, as appropriate, to evaluate and investigate the complaint, in consultation with SJCOG general counsel.

Staff shall complete its review no later than 45 calendar days after the date SJCOG received the complaint.

If more time is required, the Deputy Executive Director shall notify the complainant of the estimated time frame for completing the review. Upon completion of the review, staff shall make a recommendation regarding the merit of the complaint and whether SJCOG should take remedial actions to provide redress.

Additionally, the staff review officer may recommend improvements to SJCOG's processes relative to Title VI and environmental justice. SJCOG staff shall forward its recommendations to the Deputy Executive Director for concurrence. If the Deputy Executive Director concurs, he/she shall issue SJCOG's written response to the complainant.

II. Request for Reconsideration

If the complainant disagrees with the response, the complainant may request reconsideration by submitting the request, in writing, to the Executive Director, within ten (10) calendar days after its receipt.

The request for reconsideration shall be detailed to contain any items the complainant believes were not fully addressed by the Deputy Executive Director. The Executive Director shall notify the complainant of his decision either to accept or reject the request for reconsideration within ten (10)

calendar days.

In cases where the Executive Director agrees to reconsider, the matter shall be returned to staff for re-evaluation. The re-evaluation will follow directions set in Section I, above.

III. Submission of complaint to the Federal Transit Administration

If the complainant is dissatisfied with SJCOG's resolution of the complaint, they may also submit a complaint directly to the Federal Transit Administration (FTA) for investigation by contacting:

FTA Office of Civil Rights
Attn.: Complaint Team
East Building, 5th Floor – TRC
1200 New Jersey Ave., SE
Washington, DC 20590

In accordance with Chapter IX, Complaints, of FTA Circular 4702. 1B, complaints must be submitted within 180 calendar days after the date of the alleged discrimination.

IV. Submission of complaint to the Federal Highway Administration

If the complainant is dissatisfied with SJCOG's resolution of the complaint, they may also submit a complaint directly to the Federal Highway Administration (FHWA) for investigation by contacting:

FHWA U.S DOT
ATTN.; Office of Civil Rights
1200 New Jersey Ave., SE
8th Floor E81-105
Washington, DC 20590

Attachment E: Title VI Notice

· SAN JOAQUIN COUNCIL OF GOVERNMENTS ·
NOTICE OF PUBLIC RIGHTS UNDER TITLE VI

The San Joaquin Council of Governments (SJCOG) operates its programs and services without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act. Any person who believes he or she has been subjected to discrimination under Title VI may file a complaint with SJCOG.

For more information on SJCOG's Title VI Program and the procedures to file a complaint, go to; contact; or visit us at:

Info@sjcog.org | www.sjcog.org/civilrights | (209) 235-0600 | 555 E Weber Avenue, Stockton, CA 95202

A complainant may also file a complaint directly with the Federal Transit Administration (FTA) and/or the Federal Highway Administration at:

FTA Office of Civil Rights
Attn.: Complaint Team
East Building, 5th Floor – TRC
1200 New Jersey Ave., SE
Washington, DC 20590

FHWA U.S DOT
ATTN.; Office of Civil Rights
1200 New Jersey Ave., SE
8th Floor E81-105
Washington, DC 20590

If information is needed in Spanish, contact (209) 235-0600.

Si se necesita información en español, comuníquese al (209) 235-0600.

Notificación al Público de Derechos Bajo Título VI

El Consejo de Goveiernos de San Joaquin (SJCOG) opera sus programas y servicios, sin distinción de raza, color y origen nacional, de conformidad con el Título VI de la Ley de Derechos Civiles. Cualquier persona que cree que él o ella ha sido discriminada por cualquier práctica discriminatoria ilegal bajo el Título VI, puede presentar una queja ante el SJCOG.

Para obtener más información sobre el programa de derechos civiles y los procedimientos para presentar una queja, vaya a, comuníquese, o visite:

Info@sjcog.org | www.sjcog.org/civilrights | (209) 235-0600 | 555 E Weber Avenue, Stockton, CA 95202

El demandante puede presentar una queja directamente con la Administración Federal de Transporte Y Administración Federal de Carreteras en:

FTA Office of Civil Rights
Attn.: Complaint Team
East Building, 5th Floor – TRC
1200 New Jersey Ave., SE
Washington, DC 20590

FHWA U.S DOT
ATTN.; Office of Civil Rights
1200 New Jersey Ave., SE
8th Floor E81-105
Washington, DC 20590

If information is needed in English, contact (209) 235-0600.

Si se necesita información en ingles, comuníquese al (209) 235-0600.

Attachment F: I Speak Language Cards

I speak ...

A

Amharic

እኔ አማርኛ ነው ምናገረው.

Arabic

أنا أتحدث اللغة العربية

Armenian

Ես խոսում եմ հայերեն

B

Bengali

আমী বাংলা কথা বলতে পারী

Bosnian

Ja govorim bosanski

Bulgarian

Аз говоря български

Burmese

ကျွန်တော်/ကျွန်မ မြန်မာ လို ပြောတတ် ပါတယ်။

C

Cambodian

ខ្ញុំនិយាយភាសាខ្មែរ

Cantonese

我講廣東話 (Traditional)

我讲广东话 (Simplified)

Catalan

Parlo català

Croatian

Govorim hrvatski

Czech

Mluvím česky

D

Danish

Jeg taler dansk

Dari

من دری حرف می زنم

Dutch

Ik spreek het Nederlands

E

Estonian

Ma räägin eesti keelt

F

Finnish

Puhun suomea

French

Je parle français

G

German

Ich spreche Deutsch

Greek

Μιλώ τα ελληνικά

Gujarati

હુ ગુજરાતી બોલુ છુ

H

Haitian Creole

M pale kreyòl ayisyen

Hebrew

אני מדבר עברית

Hindi

मैं हिंदी बोलता हूँ ।

Hmong

Kuv has lug Moob

Hungarian

Beszélek magyarul

I

Icelandic

Èg tala íslensku

Ilocano

Agsaonak ti Ilokano

Indonesian

syay bisa berbahsa Indonesia

Italian

Parlo italiano

J

Japanese

私は日本語を話す

K

Kackchiquel

Quin chagüic'ká chabal' ruin' rí
tzújon cakchiquel

Korean

한국어 합니다

Kurdish

man Kurdii zaanim

Kurmanci

man Kurmaanji zaanim

L

Laotian

ຂອຍປາກພາສາລາວ

Latvian

Es runāju latviski

Lithuanian

Aš kalbu lietuviškai

M

Mandarin

我講國語 (Traditional)

我讲国语/普通话 (Simplified)

Mam

Bán chiyola tuj kíyol mam

Mon

အဲဟို အင်္ဂလိပ် ဘာသာ

N

Norwegian

Jeg snakker norsk

P

Persian

من فارسی صحبت می کنم.

Polish

Mówię po polsku

Portuguese

Eu falo português do Brasil
(for Brazil)

Eu falo português de Portugal
(for Portugal)

Punjabi

ਮੈਂ ਪੰਜਾਬੀ ਬੋਲਦਾ/ਬੋਲਦੀ ਹਾਂ।

Q

Qanjobal

Ayin tí chí walq' anjob' al

Quiche

In kinch'aw k'uin ch'e quiche

R

Romanian

Vorbesc românește

Russian

Я говорю по-русски

S

Serbian

Ja govorim srpski

Sign Language (American)



I, ME



SIGN, SIGN LANGUAGE

Slovak

Hovorím po slovensky

Slovenian

Govorim slovensko

Somali

Waxaan ku hadlaa af-Soomaali

Spanish

Yo hablo español

Swahili

Ninaongea Kiswahili

Swedish

Jag talar svenska

T

Tagalog

Marunong akong mag-Tagalog

Tamil

நான் தமிழ் பேசுவேன்

Thai

พุดภาษาไทย

Turkish

Türkçe konuşurum

U

Ukrainian

Я розмовляю українською мовою

Urdu

میں اردو بولتا ہوں

V

Vietnamese

Tôi nói tiếng Việt

W

Welsh

Dwi'n siarad

X

Xhosa

Ndithetha isiXhosa

Y

Yiddish

איך רעד יידיש

Yoruba

Mo nso Yooba

Z

Zulu

Ngiyasikhuluma isiZulu

Selected Indigenous Languages of Mexico

Agrupación Lingüística	Variante Lingüística	Frase en español	Frase en lengua
chichimeo jonaz	chichimeco jonaz	yo hablo chichimeca	ikáují úza' é~í
mazateco	mazateco del norte	yo hablo mazateco Hablo la lengua de Santa María Chilchotla	Cha'ña enná Cha'ña énn nda xo
maya	maya	Yo hablo maya	teen k-in t'aan maya
mixe	mixe bajo	Yo hablo mixe	Madyakpiëch ayuuk
	mixe alto, de Tlahuitoltpec	Yo hablo mixe	Xaamkëjxpët ayuujk èts nkajpyxyppy
mixteco	mixteco del oeste de la costa	yo hablo mixteco	Yuu kain se'en savi ñu ñundua

Selected Indigenous Languages of Mexico

Agrupación Lingüística	Variante Lingüística	Frase en español	Frase en lengua
náhuatl	náhuatl de la huasteca veracruzana (se entiende junto con Yeracruz y San Luis Potosí)	yo hablo náhuatl	Na nilajitowa náhuatl
tojolabal	tojolabal	yo hablo tojolabal	Ja 'ke'ni wala kúmaniyon tojol-abál
triqui	triqui de la baja	yo hablo triqui	'unj a'mii xna' ánj nu'a
tseltal	tseltal (variante unificada)	Yo hablo tseltal	Te jo'one ja k'op te bats'il k'op tseltal
tsotsil	tseltal (variante unificada)	Yo hablo tsotsil	Vu'une jna'xi k'opoj ta bats'i k'op
zapoteco	zapoteco de la planicie costera	yo hablo zapoteco	Naa riné' diidxazá
chinanteco	chinanteco del sureste medio	yo hablo chinanteco	Jnea lo'n jujimí kíee 'dsa mo'kuõo

A - pg. 3

Amharic
Arabic
Armenian

B - pg. 3

Bengali
Bosnian
Bulgarian
Burmese

C - pg. 4

Cambodian
Cantonese
Catalan
Croatian
Czech

D - pg. 5

Danish
Dari
Dutch

E - pg. 5

Estonian

F - pg. 5

Finnish
French

G - pg. 6

German
Greek
Gujarati

H - pg. 7

Haitian Creole
Hebrew
Hindi
Hmong
Hungarian

I - pg. 8

Icelandic
Ilocano
Indonesian
Italian

J - pg. 8

Japanese

K - pg. 9

Kackchiquel
Korean
Kurdish
Kurmanji

L - pg. 9

Laotian
Latvian
Lithuanian

M - pg. 10

Mandarin
Mam
Mon

N - pg. 10

Norwegian

P - pg. 11

Persian
Polish
Portuguese
Punjabi

Q - pg. 11

Qanjobal
Quiche

R - pg. 12

Romanian
Russian

S - pg. 12, 13

Serbian
Sign Language
Slovak
Slovenian
Somali
Spanish
Swahili
Swedish

T - pg. 13, 14

Tagalog
Tamil
Thai
Turkish

U - pg. 14

Ukrainian
Urdu

V - pg. 14

Vietnamese

W - pg. 14

Welsh

X - pg. 15

Xhosa

Y - pg. 15

Yiddish
Yoruba

Z - pg. 15

Zulu

See page 16,17
for selected
indigenous
languages
of Mexico.

Limited English Proficiency Resources

<https://www.lep.gov>

“I Speak” is provided by the Department of Homeland Security Office for Civil Rights and Civil Liberties (CRCL).

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Office for Civil Rights and Civil Liberties

www.dhs.gov/crcl

Toll Free: 1-866-644-8360

Toll Free TTY: 1-866-644-8361

Email: crcl@dhs.gov



Attachment G: References

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