

Limited English Proficiency (LEP) Language Access Plan (LAP)

Executive Summary



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Introduction

Caltrain provides commuter rail service along the San Francisco Peninsula, through the South Bay to San Jose and Gilroy. The San Francisco and San Jose Railroad Company began passenger rail service on the Peninsula in 1863. The system known today as Caltrain had its start in 1992, when the Peninsula Corridor Joint Powers Board took over the operation of the train. It operates within three diverse counties: San Francisco, San Mateo, and Santa Clara. Caltrain is governed by the Peninsula Corridor Joint Powers Board (JPB), which consists of agencies from the three Caltrain counties. The member agencies are the City and County of San Francisco, San Mateo County Transit District, and the Santa Clara Valley Transportation Authority (VTA). Caltrain's service area population is over 3 million and approximately 625 square miles.

Caltrain has 29 regular stops, one special event-only stop (Stanford Stadium), and one weekend-only stop (Broadway). In 2024, Caltrain implemented the electrification of its train system, which significantly increased the speed of its service and resulted in changes to its service design. In addition to providing Local service, which stops along all the 29 regular stations, and Limited-stop service that operates in the peak periods and bypasses some of the local stops, it rebranded "Baby Bullet" service as "Express" service which stops at 6 stations in the peak period between San Francisco and San Jose Diridon station. Caltrain also added a new "South County Connector." This diesel service operates between Gilroy and San Jose Diridon, providing a timed, three-minute cross-platform transfer to and from electric trains at San Jose Diridon. Including the transfer at San Jose Diridon, travel time from southern Santa Clara County to San Francisco was reduced by up to 20 minutes.

Title VI

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin. To demonstrate compliance with Title VI, the Federal Transit Administration (FTA) requires transit agencies to submit a Title VI Program every three years. Federal Transit Administration Title VI Circular 4702.1B provides guidance on which elements shall be included in the Title VI Program, including a Language Assistance Plan (LAP).

On August 11, 2000, the President signed Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" that requires Federal agencies and recipients of Federal funds to examine the services they provide, identify any need for services to those with limited English proficiency (LEP), and develop and implement a system to provide those needed services so that LEP persons can have meaningful access to them.

On March 1, 2025, the President signed Executive Order (EO) 14224, "Designating English as the Official Language of the United States," which revoked Executive Order 13166. The EO also states that, "nothing in this order, however, requires or directs any change in the services provided by any agency. Agency heads should make decisions as they deem necessary to fulfill their respective agencies' mission and efficiently provide Government services to the American people. Agency heads are not required to amend, remove, or otherwise stop production of documents, products, or other

services prepared or offered in languages other than English. “The United States Department of Transportation (DOT) published specific guidance regarding Limited English Proficiency and Title VI compliance on its website dated July 3, 2025, and July 9, 2025, after EO 14224 was issued.

About Limited English Proficiency (LEP)

Limited English proficiency (LEP) means that a person: does not speak English as their primary language; has a limited ability to read, write, speak, or understand English; and/or may be competent in English for certain types of communication (e.g., speaking or understanding), but may not be able to read or write in English.

The United States Department of Transportation (DOT) understands the need to communicate effectively and meaningfully to persons who are limited English proficient. The DOT’s stated position on its website says, “communication is a paramount component of DOT’s statutory purpose to develop a safe, efficient, and convenient transportation system and to ensure the coordinated and effective administration of the transportation programs of the United States Government.

Proficiency and communication in English has been legally required for some of our most complex modes of transportation such as aviation, maritime, rail, and freight operations. While English is a requirement for many of our transportation professionals, the public we serve does not have an English proficiency obligation

Individuals with limited English proficiency (LEP) often face significant limitations in understanding vital transportation safety information, whether it be signage, announcements, emergency procedures, or public safety campaigns, creating weaknesses that can lead to collisions, fatalities and injuries, miscommunication during emergencies, and difficulty accessing essential services. Access to safety information to individuals with limited English proficiency increases safety for all.”¹

In addition, California has state-specific civil rights laws that require agencies to help individuals who are limited English proficient. California Code 11135 is analogous to Title VI and the **Dymally-Alatorre Bilingual Services Act of 1973** requires government or public agencies to be able to effectively communicate with persons who do not speak, write, or read because their primary language is other than English.

Language Access Plan

Caltrain’s Language Access Plan (LAP) was updated January of 2026. The purpose of the LAP is to ensure that language does not present barriers to access to the agency’s programs, services, or activities. Discriminating against individuals who are LEP may be a form of national origin

¹ US DOT Webpage July 3, 2025

discrimination. The foundation for the development of the Language Access Plan is the Four Factor Analysis:

- **Factor 1:** The number or proportion of LEP persons eligible to be served or likely to encounter a program, activity, or service of the recipient or grantee;
- **Factor 2:** The frequency with which LEP individuals come in contact with the program;
- **Factor 3:** The nature and importance of the program, activity, or service provided by the recipient to people's lives; and
- **Factor 4:** The resources available to the recipient and costs for translation services.

Resources that were used to inform the LAP include:

1. Feedback from outreach to community-based organizations (CBOs)
2. Rider surveys
3. American Community Survey (US Census data)
4. California Department of Education English Learner data
5. National Equity Atlas

Key Findings

Based on the Four-Factor analysis, the languages most frequently encountered have been broken down into the following three categories:

- **Tier One Languages:** Spanish and Chinese (including Mandarin and Cantonese)
- **Tier Two Languages:** Vietnamese, Tagalog, Korean, and Russian
- **Tier Three “Safe Harbor” Languages** for vital document translation in addition to those listed above: Hindi, Japanese, Tamil, French, Farsi, Telugu, Portuguese, Marathi, German, and Arabic

Vital Documents and Translation Policy

Caltrain translates vital and other documents into the languages of frequently encountered LEP customers. According to federal guidance, vital written documents include consent and complaint forms; intake and application forms with the potential for important consequences; written notices of rights; notices of denials, losses, or decreases in benefits or services; and notices advising LEP individuals of free language assistance services. Vital documents can be exact translations or summaries of key contents.

The following table lists both vital and non-vital documents, categories of documents, and identifies the language category into which they should be translated. Caltrain may provide a summary, such as a fact sheet of a vital document or may offer oral language interpretation rather than written translation of a vital document. Caltrain uses the table as a starting point for discussion on what documents should be translated but also considers the specific population of outreach.

List of Vital Documents and Required Language Translations

<u>Document</u>	<u>Languages</u>	<u>Examples</u>	<u>Vital Document?</u>
Title VI Notices	All Safe Harbor Languages	On-Board Take Ones	Yes
Safety and Security Information	All Safe Harbor Languages / Icons and Symbols to reach as many LEP riders as possible, regardless of language spoken and literary levels.	Emergency Safety Procedures	Depends on subject matter
Notice of Free Language Assistance	All Safe Harbor Languages		Yes
Legal Notices	All Safe Harbor Languages		Yes
Title VI Complaint Form and Procedures	All Safe Harbor Languages		Yes
Instructional or Informational Ridership Brochures	Primary Tier 2 and Tier 3 when requested	Take ones, Traveling Tips, Rider Guides	Yes
Applications to Participate in Programs, Benefits, and Services	Primary Tier 2 and Tier 3 when requested		Yes
Fare and Major Service Change Notices	Primary Tier 2 and Tier 3 when requested		Yes
Select Other Fare and Major Service Change Documentation	Primary Tier 2 and Tier 3 as requested		No
Project Fact Sheets	Primary Tier 2 and Tier 3 determined by location and/or as requested	Translated Fact Sheets/Summaries may be created in lieu of large document translations depending on the subject matter and cost.	Depends on Subject Matter
Public Hearings	Primary (Meeting Notices) Tier 2 and Tier 3 as requested	Formal Notices, protocols to submit comments, presentation materials	Yes
Public Outreach	Primary (Meeting Notices) Tier 2 and Tier 3 as determined by location and as funding permits	Formal Notices, Documents that require public input, fact sheets, informational brochures with key information	Depends on Subject Matter
General Promotional Materials/ Promotional Events	Primary Tier 2 and Tier 3 languages as determined by location and as funding permits	Flyers, brochures	No
Construction and Other Courtesy Notices	Primary Tier 2 and Tier 3 languages determined by location and as funding permits	Service Disruptions, Retrofits, Special Events	No
Surveys	Primary as determined by location and as funding permits. Oral interpretation by request		No

Languages Spoken at Home

According to the Caltrain 2025 Triennial Customer Service Satisfaction Survey, riders speak 70 languages in their homes. The top five languages spoken at home, other than English, by Caltrain’s customers are:

1. Spanish
2. Chinese (Mandarin and Cantonese)
3. Hindi
4. Tagalog
5. Vietnamese

Percentage of customers who are Limited-English Proficient

The 2025 Triennial Customer Satisfaction Survey results are consistent over the six-year period that the three triennial surveys were taken in 2019, 2022, and 2025, which show that only 1%, 2%, and 2%, respectively, are limited English proficient or that speak English “not well”.

Linguistic Isolation

To help understand the percentage of the community that may be affected by language barriers, the Census defines a “linguistically isolated” household as one in which no member over the age of 14 years old speaks English only or the household members speak a non-English language and don’t speak English “very well.” Individuals in these households may face significant language barriers because they may not be able to rely on an adult relative who speaks English well to provide translation assistance.

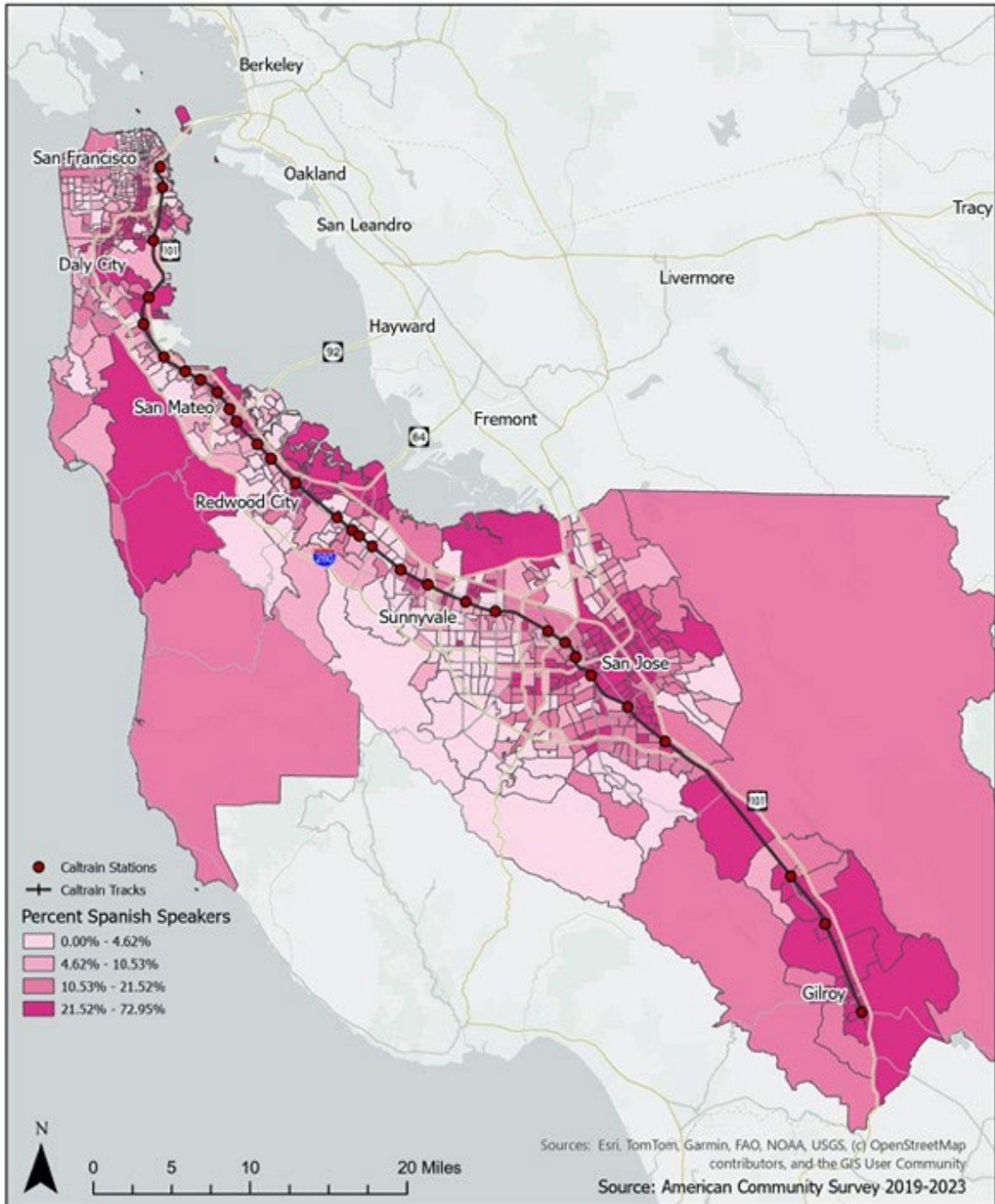
Linguistic Isolation by County in the Caltrain Service Area

- **San Francisco County:** Chinese (45%) and Vietnamese (36%) language speakers are the most linguistically isolated communities.
- **San Mateo County:** Chinese (28%) and Salvadoran (29%) language speakers are the most isolated Communities.
- **Santa Clara County:** Japanese (36%) and Vietnamese (38%) language speakers are the most linguistically isolated communities.

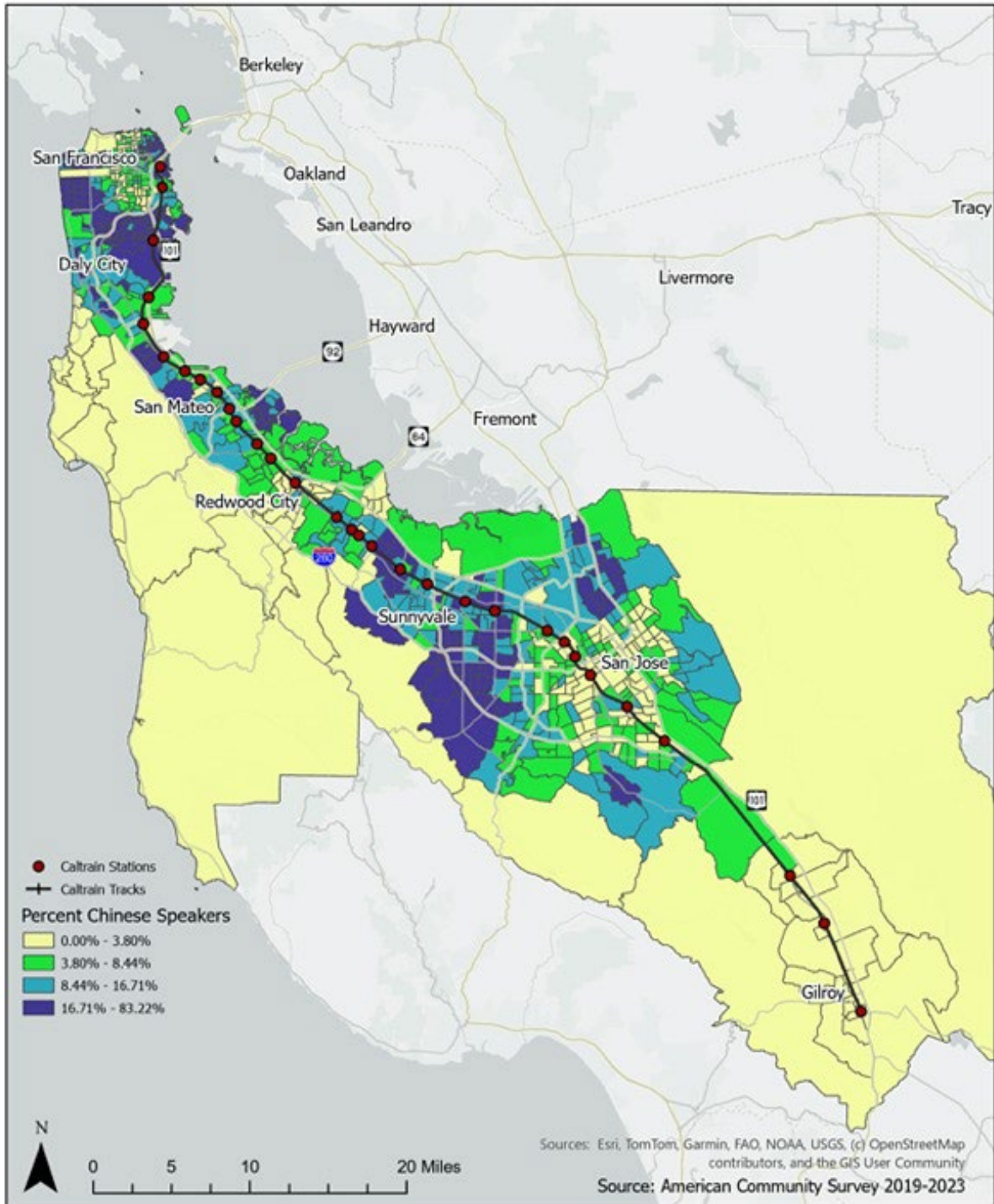
Where are the Largest Populations of LEP Communities Concentrated?

To better understand the location of the LEP concentrations, the analysis also includes a Geographic Information Systems (GIS) analysis of the ACS survey data. The data provides tract-level information to provide a geographic picture of where concentrations of LEP individuals live within the service area. The following maps provide a GIS view of the concentrations of LEP populations for the following top six discrete languages from the ACS data that represent greater than 15,000 individuals per language who speak English “Less Than Very Well”: Spanish, Chinese (including Mandarin and Cantonese), Vietnamese, Tagalog, Korean, and Russian.

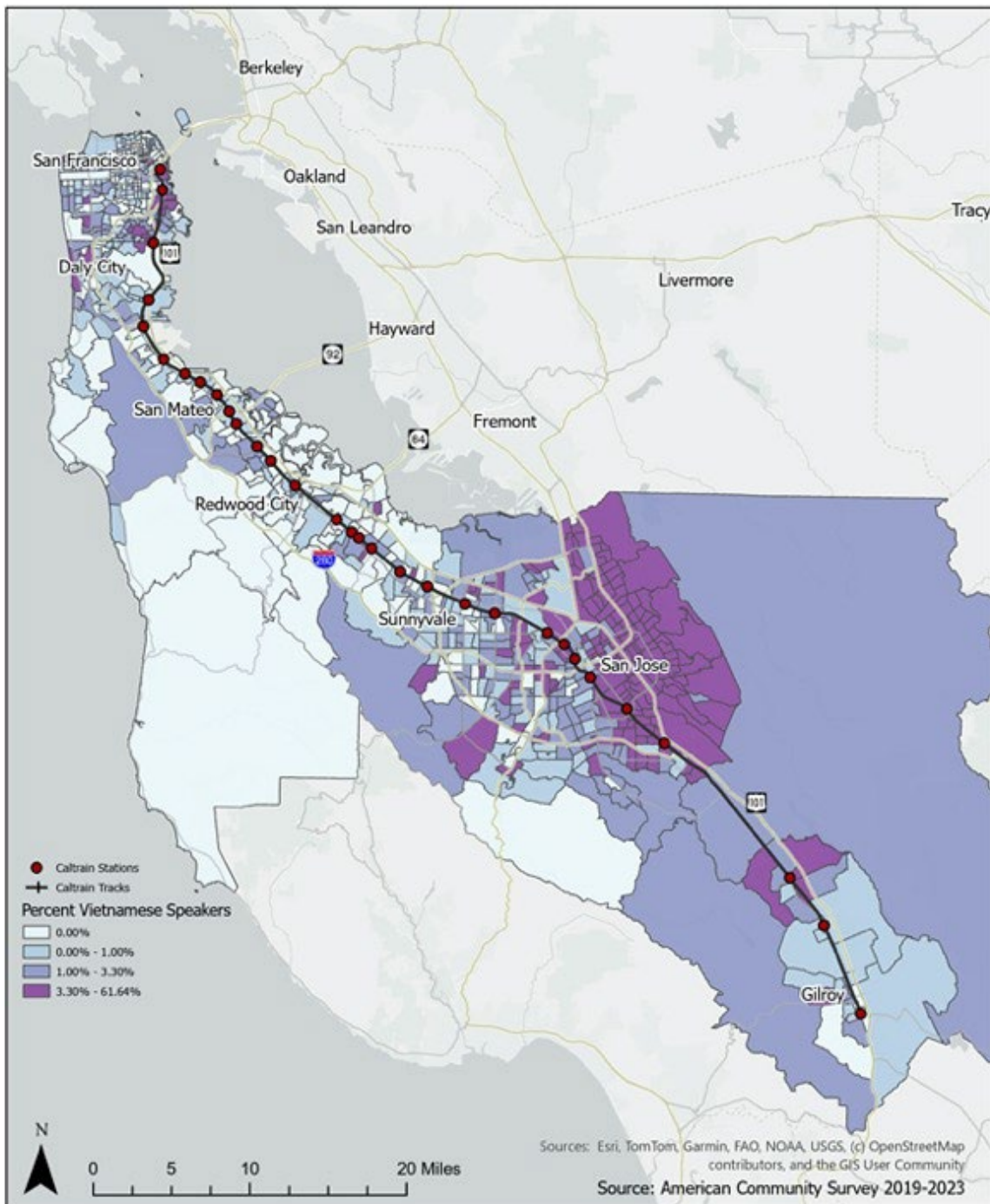
Percent of Spanish Speaking Population



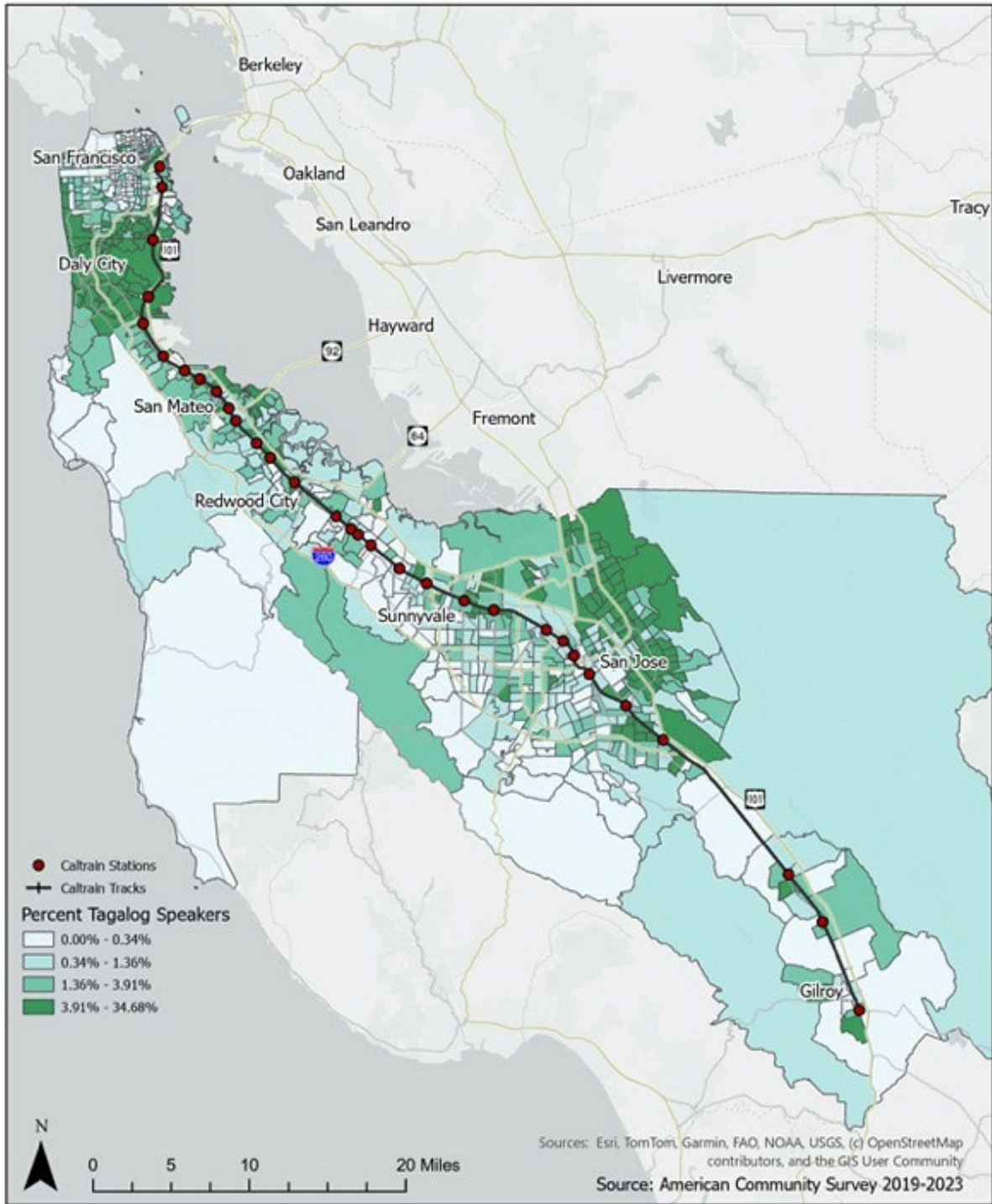
Percent of Chinese Speaking Population (Including Mandarin and Cantonese)



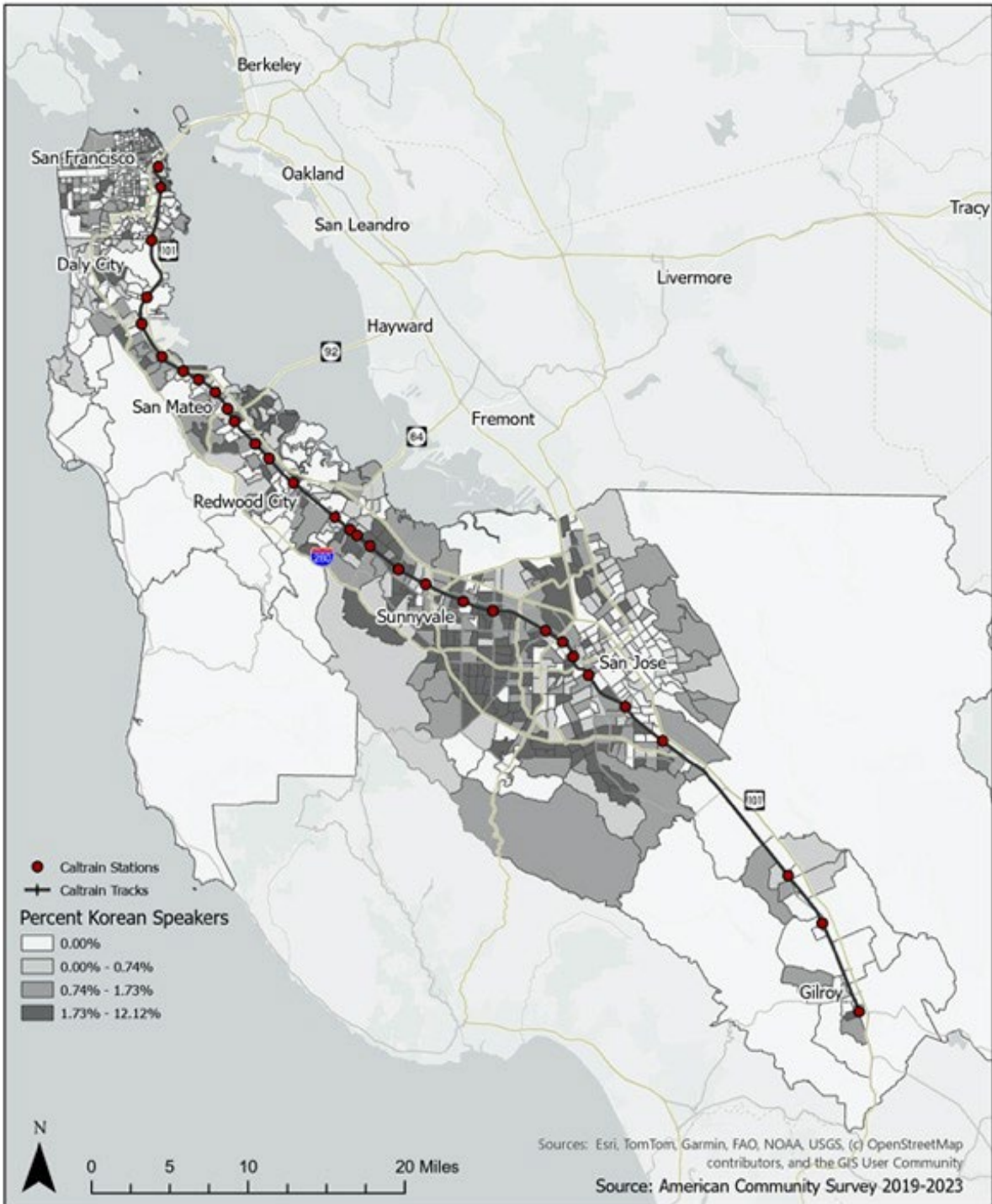
Percent of Vietnamese Speaking Population



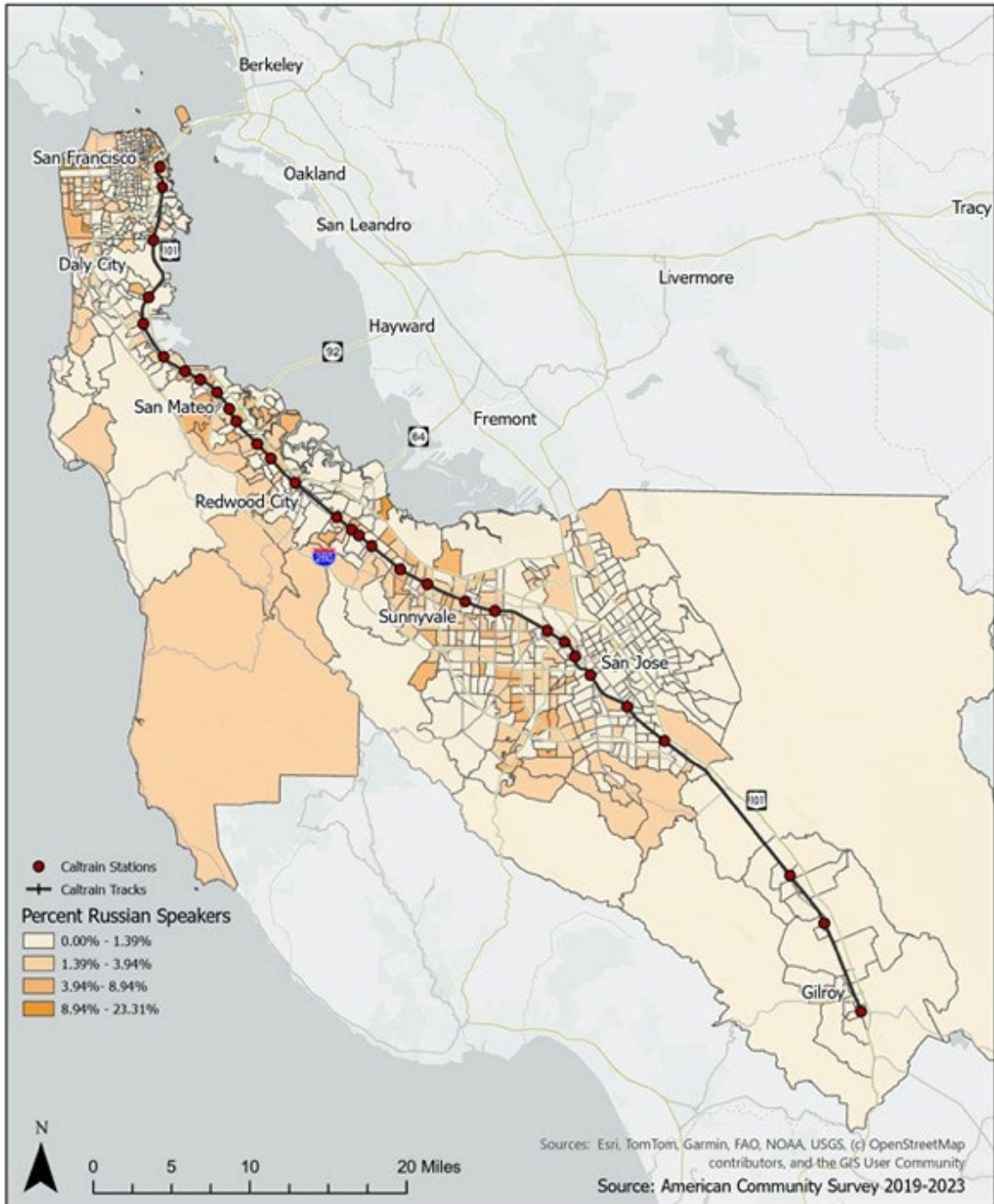
Percent of Tagalog (Including Filipino) Speaking Population



Percent of Korean Speaking Population



Percent of Population Speaking Russian, Polish or Other Slavic



Which LEP Communities Request Real-Time Language Assistance for Trip or Other Types of Information?

Language Line data from January 2023 to September 2025 indicates that 7,741 customers called to request language assistance. Both Caltrain and SamTrans customers' calls are received at the same Customer Service Center, and Language Line calls are not differentiated between the two transit providers. When viewing these numbers in total, 75% of the calls for telephonic interpretations are requested by customers who speak Spanish, followed by 11% of Mandarin speakers, 6% of Cantonese speakers, 2% of Russian speakers, and 1% of Tagalog speakers.

Meaningful and Inclusive Communication

Caltrain wants to make sure that it communicates with the riding public by various means, including, but not limited to, providing real-time, live assistance through its language line, hosting meetings with community service organizations, and translating timetables, newsletters, marketing materials, and public hearing information. Caltrain also uses multilingual news media to communicate to its customers.

Spanish Speakers

- Preference for translated schedules, although LEP Spanish speakers could read the timetables.
- Preference for word-of-mouth or printed timetables.
- Prefer interpretation at public meetings if held to talk about service or fare changes.
- Preference for translated schedules.
- Newspapers: Gilroy Dispatch - Nuestra Ciudad, El Observador, El Tecolote
- Radio Station: 93.3 La Preciosa
- TV Stations: Univision and Telemundo

Chinese Speakers

- Preference for translated schedules.
- Prefer interpretation at public meetings if held to talk about service or fare changes.
- Preference for Cantonese, Simplified and Traditional translations.
- Prefer to receive information by the following resources/methods:
 - Newspaper: Sing Tao Daily, World Journal
 - Radio Station(s): 1400 AM
 - TV Station(s): KTSF Channel 26
 - Other: Website (Internet), Maps, Mobile Phone
 - Interface with community-based organizations that do regular outreach

Tagalog Speakers

- Preference for verbal interpretation in Tagalog; however, Tagalog speakers prefer written information in English.
- Prefer to receive information through watching The Filipino Channel (TFC) that broadcasts news in Tagalog and may be a good tool to communicate important information.

Language Assistance Measures

Caltrain is committed to providing meaningful access to information and services to its LEP customers. Caltrain uses various methods to accomplish this goal. Specific methods pertaining to outreach are discussed in Caltrain’s Public Participation Plan.

Currently, Caltrain’s primary language assistance tools include:

- Using “I Speak” cards including all Safe Harbor languages on board trains to facilitate translation services
- Google Translate tool on Caltrain website
- Language Line
- Spanish translations on ticket machines
- Pictograms on trains, at stations and at grade crossings
- Translators and interpreters (by request) for focus groups and public hearings
- Multilingual printed materials, especially for fare and service changes, and construction notices
- Posting Caltrain news, notices, and information to newspapers in other languages (e.g. El Observador, El Reportero, Sing Tao Daily)
- Multilingual media advertising (print, television and radio)
- Partnering with Clipper (regional fare card) to produce shared multilingual Caltrain customer information
- Caltrain bilingual Customer Service Representatives
- CBO assistance in outreach to LEP populations and translations

Language Assistance Expenses

Caltrain provides real-time interpretation services for customers who need language assistance. It also translates documents into languages in accordance with its vital documents plan. In fiscal years 2023 and 2024, Caltrain spent \$67,818 and \$67,742, respectively, to provide interpretation and translation services. In fiscal year 2025, it spent \$77,335.

Recommendations

Caltrain customer surveys and its relationships with community-based organizations (CBOs) provide important information about the demographics and riding history of its customers. The information is contained in this LAP, survey and ridership reports. To remove barriers to access, Caltrain should continue to update its Language Access Plan. In particular, Caltrain should maintain its practice of obtaining customer feedback through on-board surveys and continue building relationships with CBOs.

Most customers use Caltrain to go to work, 67%, followed-by riders who use it for social or recreational purposes (19%), going to school (6%), and shopping or running errands (5%).

Electrification has increased ridership substantially but since it is relatively new, so, ridership trends have not been established. As Caltrain continues to monitor the impact of electrification, it should also seek out ways to increase ridership for students and riders who use the service for recreational purposes. Car availability among riders who are limited English proficient tends to be lower. To promote ridership Caltrain should continue to maintain relationships with LEP communities, conduct outreach and educational campaigns to teach potential riders how to use the services and learn about the availability of language assistance services.