

Maple Grove Transit 2020 Language Assistance Plan

Last Updated: March 19, 2020

Background

Purpose

The following document serves as the Title VI Language Assistance Plan for Maple Grove Transit. This document demonstrates the City of Maple Grove's commitment to provide meaningful access to all individuals accessing Maple Grove Transit services. Internally, this plan is intended for staff who interact directly or indirectly with limited English proficiency (LEP) individuals. LEP legal requirements also apply to subcontractors and vendors who do business with the Maple Grove Transit. LEP community members and advocates can refer to this plan to learn about the Maple Grove Transit's commitment to equal access.

Dissemination of the Language Assistance Plan

Any internal or external individual will be able to access the plan via the Internet. A link to the Maple Grove Transit Language Assistance Plan and the Title VI Program will be included on the Maple Grove Transit website, www.maplegrovern.gov/services/transit/commitment-to-fairness.

Any person or agency may request a copy of the Language Assistance Plan via telephone, mail, or in person, and shall be provided a copy at no cost. The City of Maple Grove will provide translated copies of the plan upon request. Questions or comments regarding the Language Assistance Plan may be submitted to:

Michael Opatz
Transit Administrator
City of Maple Grove
12800 Arbor Lakes Parkway
Maple Grove, MN 55369
763-494-6001
mopatz@maplegrovern.gov

Authority

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., provides that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives 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 persons because such conduct constitutes national origin discrimination.

Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency," reprinted at 65 FR 50121, August 16, 2000, directs each Federal agency to examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services. Federal agencies were instructed to publish guidance for their respective recipients in order to

assist them with their obligations to LEP persons under Title VI. The Executive Order states that recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. President Bush affirmed his commitment to Executive Order 13166 through a memorandum issued on October 25, 2001 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 users of Federal programs.

The U.S. Department of Transportation (DOT) published revised guidance for its recipients on December 14, 2005. This document states that Title VI and its implementing regulations require that DOT recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for LEP individuals and that recipients should use the DOT LEP Guidance to determine how best to comply with statutory and regulatory obligations to provide meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are LEP.

The Federal Transit Administration (FTA) references the DOT LEP guidance in its Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients," which was published on October 1, 2012. Chapter III part 9 of this Circular reiterates the requirement to take responsible steps to ensure meaningful access to benefits, services, and information for LEP persons and suggests that FTA recipients and sub-recipients develop a language implementation plan consistent with the provisions of Section VII of the DOT LEP Guidance.

Plan Outline

The DOT LEP Guidance notes that effective implementation plans typically include the following five elements:

1. Identifying LEP individuals who need language assistance
2. Providing language assistance measures
3. Training staff
4. Providing notice to LEP persons
5. Monitoring and updating the plan

Identification of Limited English Proficient Individuals in the Service Area

In order to prepare this plan, the City of Maple Grove completed the Four Factor Analysis, as outlined in the FTA Circular 4702.1B. This analysis includes:

1. Identifying the number or proportion of LEP persons eligible to be served or likely to be encountered by Maple Grove Transit;
2. Determining the frequency with which LEP persons come in contact with Maple Grove Transit's programs, activities or services;
3. Determining the nature and importance of programs, activities or services provided by Maple Grove Transit to LEP people; and
4. Assessing the current resources available and the costs to provide language assistance.

1. The Number or Proportion of LEP Individuals in the Service Area

As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. It includes people who reported to the U.S. Census Bureau that they speak English less than very well, not well, or not at all.

The U.S. Census Bureau collects data through the American Community Survey (ACS) to assess language characteristics within a geographic area. These data identify a person's ability to speak English "very well" or less than "very well" and the language predominately spoken at home for those populations age 5 and older. The 2014-2018 ACS five-year estimates provided quantitative information regarding LEP populations for the city of Maple Grove. An analysis of these data identified LEP populations and their language characteristics within the Maple Grove Transit service area.

According to 2014-2018 ACS five-year estimates, 69,571 people live within the city of Maple Gove. As part of the ACS, the Census Bureau surveys residents ages 5 and over about the language spoken at home and English proficiency.

Within Maple Grove, 93 percent of the population – 64,827 people – are age 5 and over. Of those, 11.9 percent speak a language other than English in their home (Table 1).

Table 1: Language Spoken at Home for the Population 5 Years and Over

Language	Total	Percent
English	57,135	88.1%
Other Indo-European languages	1,443	2.2%
Russian, Polish, or other Slavic languages	1,170	1.8%
Spanish	1,060	1.6%
Other Asian and Pacific Island languages	1,016	1.6%
Other and unspecified languages	747	1.2%
Chinese (incl. Mandarin, Cantonese)	658	1.0%
Vietnamese	583	0.9%
French, Haitian, or Cajun	398	0.6%
German or other West Germanic languages	320	0.5%
Korean	128	0.2%
Tagalog (incl. Filipino)	126	0.2%
Arabic	43	0.1%
Total	64,827	100.0%

Source: 2014-2018 American Community Survey 5-Year Estimates, Table C16001.

The Safe Harbor Provision, which DOT adopted from the Department of Justice, stipulates that, "if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance."¹

¹ Five percent (5%) of the Maple Grove Transit service area population (69,571) is 3,479 people. As such, and in accordance with the Safe Harbor Provision, Maple Grove Transit uses 1,000 people as the threshold for automatically providing written translation of vital documents for each eligible LEP language group.

Table 2 lists languages spoken at home for the population five years and over by ability to speak English within Maple Grove by the thirteen language classifications contained in the 2014-2018 ACS at the census tract level. In Maple Grove, 2,361 people – 3.6 percent of the population five years and over – speak English less than “very well.” The top languages spoken by those who speak English less than “very well” within Maple Grove include Russian, Polish, or other Slavic languages; Vietnamese; and “Other Indo-European” languages. No languages have LEP populations that exceed 5 percent of the total population in the service area; the maximum is 0.6 percent, attributed to Russian, Polish, or other Slavic languages. None of the twelve non-English languages classifications have LEP populations over 1,000.

Table 2: Language Spoken at Home for the Population 5 Years and Over by Ability to Speak English

Language	Total	Speak English Less than Very Well (LEP)	Percent of LEP Population	LEP as Percent of Population 5 Years and Over
English	57,135	--	--	--
Russian, Polish, or other Slavic language	1,170	406	17.2%	0.6%
Vietnamese	583	334	14.1%	0.5%
Other Indo-European languages	1,443	276	11.7%	0.4%
Other and unspecified languages	747	246	10.4%	0.4%
French, Haitian, or Cajun	398	242	10.2%	0.4%
Chinese (incl. Mandarin, Cantonese)	658	235	10.0%	0.4%
Other Asian and Pacific Island languages	1,016	226	9.6%	0.3%
Spanish	1,060	222	9.4%	0.3%
Tagalog (incl. Filipino)	126	99	4.2%	0.2%
Korean	128	40	1.7%	0.1%
German or other West Germanic languages	320	35	1.5%	0.1%
Arabic	43	0	0.0%	0.0%
Total	64,827	2,361	100.0%	3.6%

Source: 2014-2018 American Community Survey 5-Year Estimates, Table C16001.

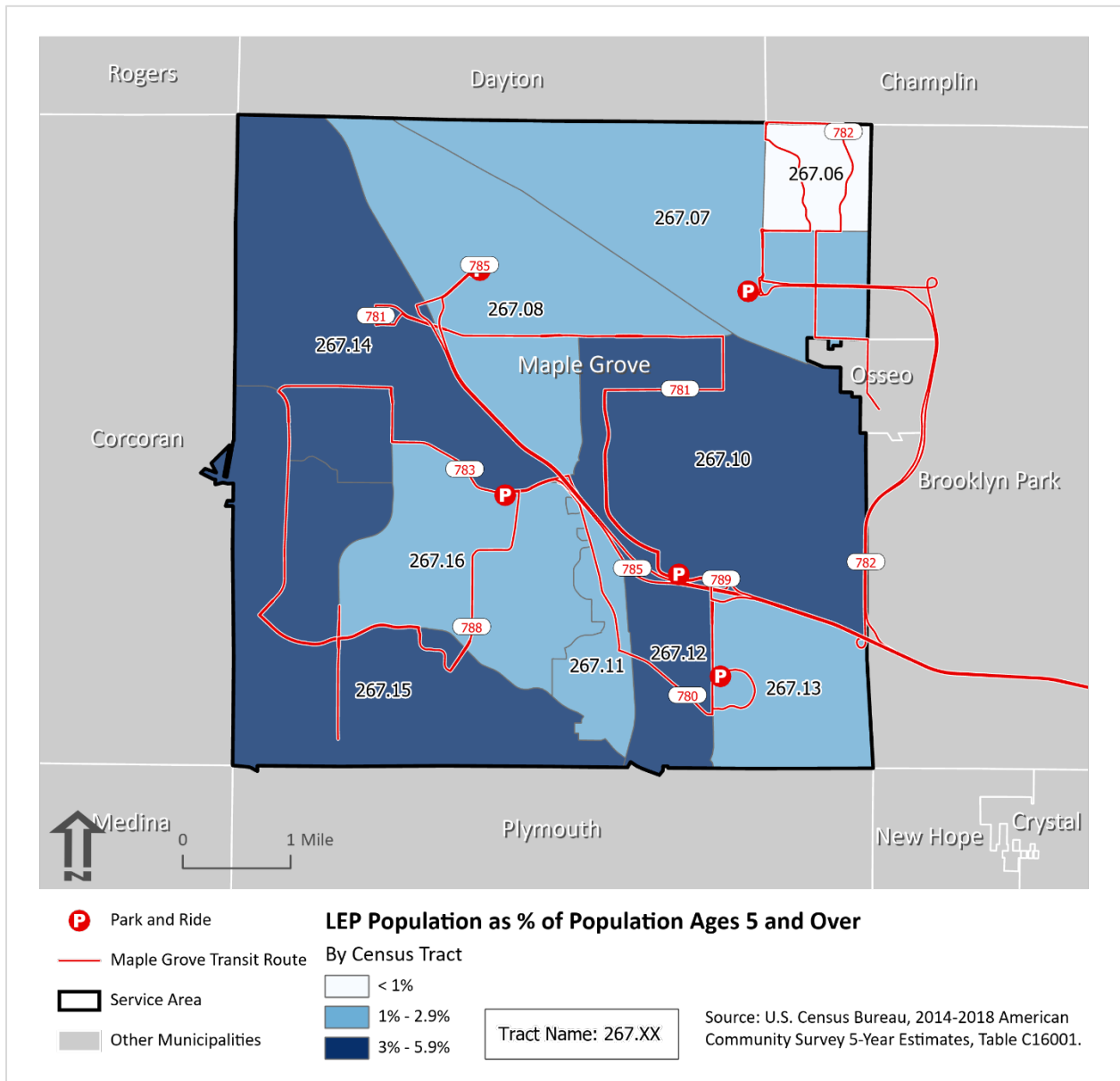
2. The Frequency of Contact Between LEP Individuals and Maple Grove Transit’s Services

This section includes information describing how frequently LEP communities interact with Maple Grove Transit’s programs, activities or services. This is important, as the more frequent the contact, the more likely enhanced language services will be needed. The analysis uses information from the Census, Maple Grove Transit bus operator and staff surveys, and documentation of requests for services and information.

Distribution of LEP Population within the Service Area

The city of Maple Grove is comprised of 10 census tracts, all of which are served in some capacity by Maple Grove Transit, whether through fixed routes (Figure 1) or citywide MY RIDE general public demand response service.

Figure 1: Distribution of All Limited English Proficiency Speakers by Census Tract



As shown in Table 3, each of the ten census tracts that make up the city of Maple Grove is home to LEP people. In each census tract, LEP people make up less than 6 percent of the tract population ages 5 and over (Table 3, Figure 1). Three of the 10 census tracts contain 73 percent of Maple Grove’s LEP population, despite containing 51 percent of the city’s population 5 years and over; these tracts – 267.15, 267.14, and 267.10 – are shown in Figure 1.

However, even in these three most LEP-populated census tracts, the total number of LEP individuals – regardless of which non-English language they speak – is less than 1,000, the applicable Safe Harbor Provision threshold.

Table 3: Population 5 Years and Over by Census Tract by Ability to Speak English

Census Tract	Total	Percent of Population 5 Years and Over	Speak English Less Than "Very Well" (LEP)	Percent of LEP Population	LEP as Percent of Population 5 Years and Over
Census Tract 267.15	15,039	23.2%	708	30.0%	4.7%
Census Tract 267.14	9,435	14.6%	516	21.9%	5.5%
Census Tract 267.10	8,709	13.4%	504	21.3%	5.8%
Census Tract 267.16	7,950	12.3%	188	8.0%	2.4%
Census Tract 267.12	3,176	4.9%	187	7.9%	5.9%
Census Tract 267.11	2,870	4.4%	64	2.7%	2.2%
Census Tract 267.07	4,448	6.9%	56	2.4%	1.3%
Census Tract 267.13	4,253	6.6%	56	2.4%	1.3%
Census Tract 267.08	5,394	8.3%	55	2.3%	1.0%
Census Tract 267.06	3,553	5.5%	27	1.1%	0.8%
Total	64,827	100.0%	2,361	100.0%	3.6%

Source: 2014-2018 American Community Survey 5-Year Estimates, Table C16001.

Requests for Language Services

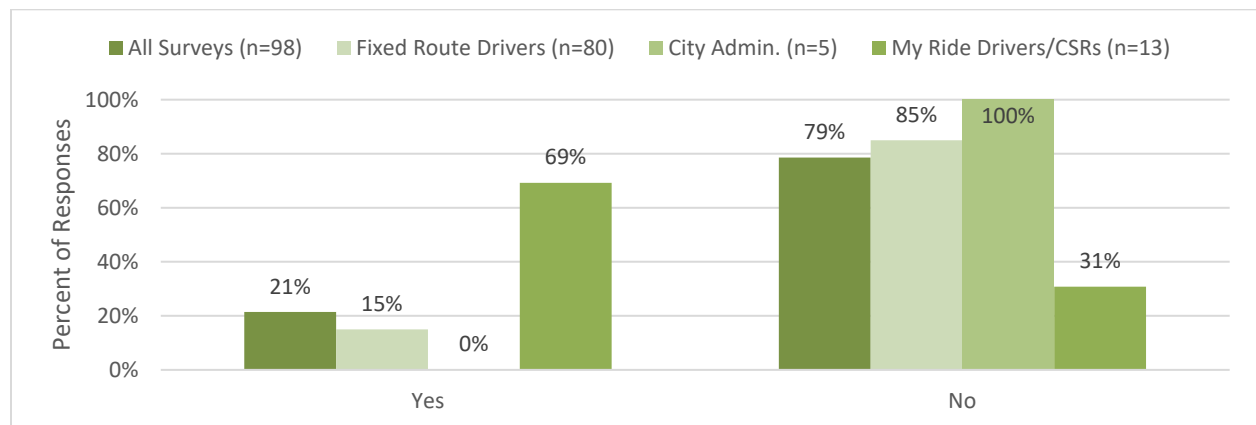
In the last three years, the City of Maple Grove has had zero requests for language interpreters and zero requests for translated Maple Grove Transit documents. **Exhibit A** is a copy of the log used by the Maple Grove Transit Administrator to record inquiries for requests for interpreters and requests for translated Maple Grove Transit documents.

Driver and Staff Surveys

In February 2020, Maple Grove Transit surveyed staff who interact with customers on a regular basis, including fixed route drivers, MY RIDE drivers and customer service representatives (CSRs), and City administrative staff. Copies of the survey instruments are included in **Exhibit B**.

In total, 98 Maple Grove Transit staff surveys were returned, including: 80 from fixed route drivers, 13 from MY RIDE drivers or CSRs, and 5 from City administrative staff. Among all respondents, 21 percent (21 staff) reported interacting with LEP customers in the previous 3 months (Figure 2).

Figure 2: Survey Question 1: "In the past three months, do you recall coming into contact with LEP customers?" (n=98)



A greater proportion of MY RIDE Drivers/CSRs interacted with LEP customers more in the last three months compared to fixed route drivers and City administrative staff. None of the five City administration staff – who have contact with the general public regarding transit matters via the phone, walk-ins, or e-mail – reported contacts with LEP customers in the previous three months.

Among the 21 staff who interacted with LEP customers in the last 3 months, 14 staff (14 percent of all respondents) reported interacting with LEP customers at least twice per week, on average (Figure 3). However, just 7 staff (7 percent of all respondents) reported assisting LEP customers at least twice per week, on average (Figure 4). These results suggest that some of Maple Grove Transit’s LEP customers do not seek assistance.

Figure 3: Survey Question 3: “On average, how many times per week do you come into contact with LEP customers related to Maple Grove Transit?” (n=21)

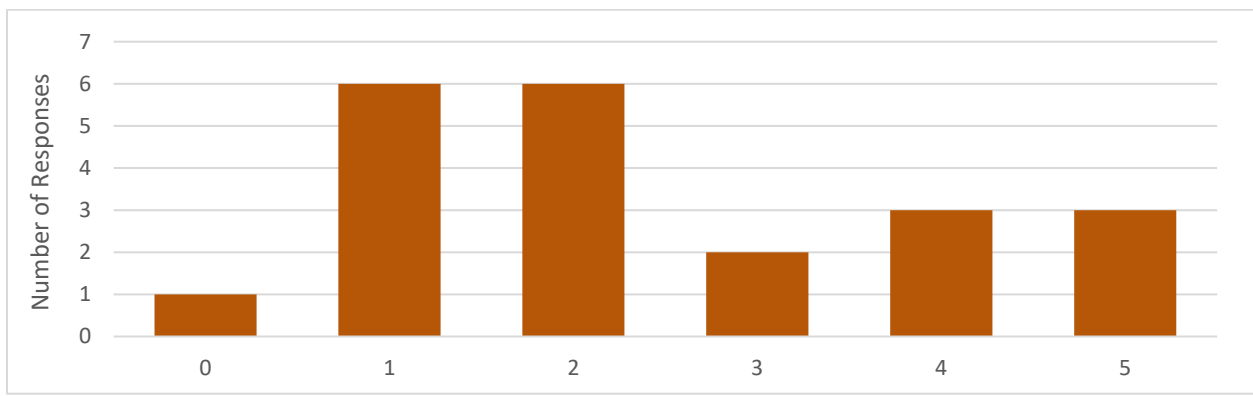
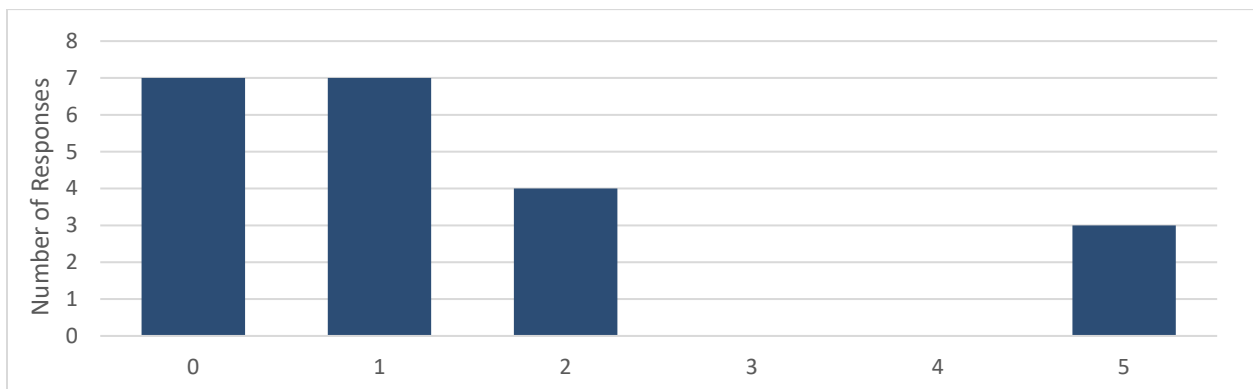
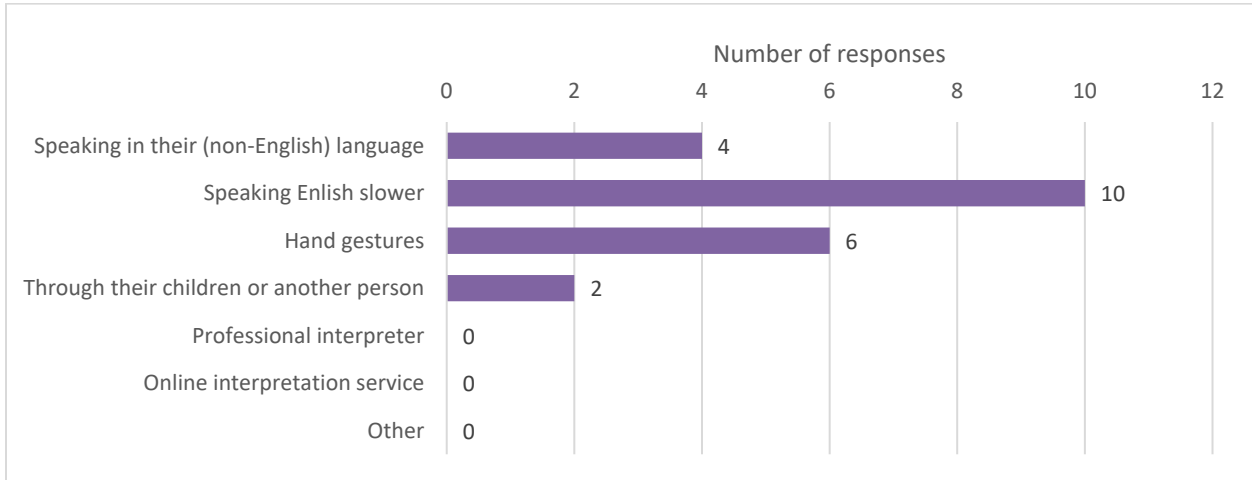


Figure 4: Survey Question 3: “On average, how many times per week do you provide assistance to LEP customers related to Maple Grove Transit?” (n=21)



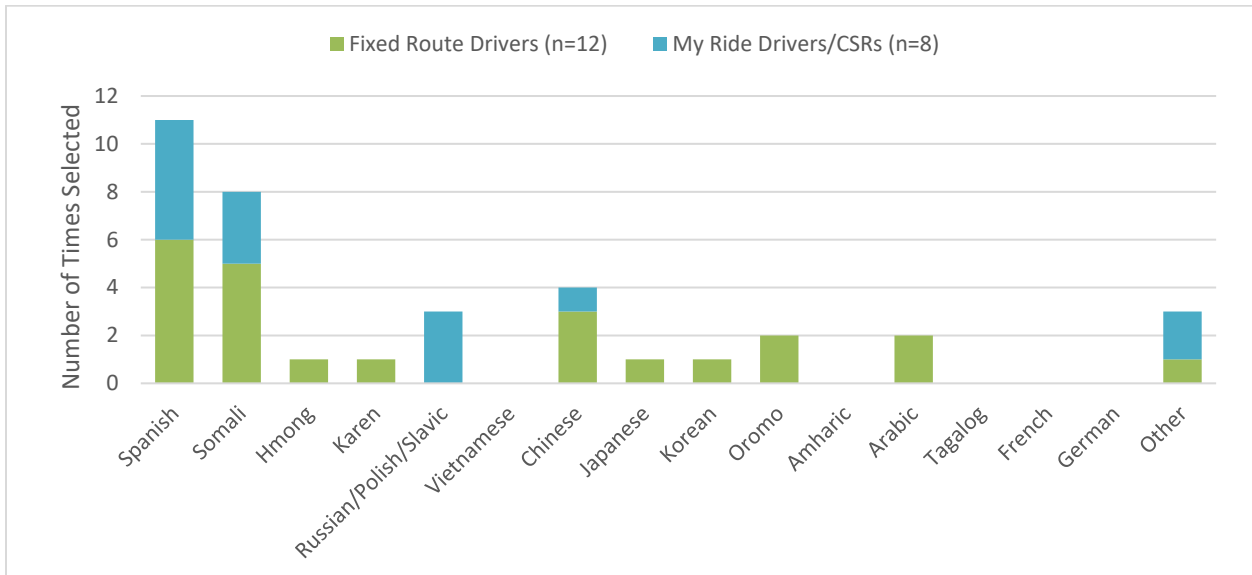
Maple Grove Transit staff who communicate with LEP customers do so through a few different means. Most commonly, staff try to communicate with LEP customers by speaking English slower, using hand gestures, or speak in the customer’s non-English language (Figure 5).

Figure 5: Survey Question 5: “How do you try to communicate with LEP customers? (select all that apply)” (n=15)



When asked which non-English languages they encounter when operating or providing assistance for Maple Grove Transit, staff most commonly reported Spanish and Somali (Figure 6). MY RIDE drivers/CSRs reported Russian/Polish/Slavic languages, while fixed route drivers did not; 2014-2018 ACS data suggest that the largest LEP population living in Maple Grove speak Russian/Polish/Slavic languages. Other languages came from customers of African and Indian descent, according to the respondent.

Figure 6: Survey Question 2: “If known, which non-English languages spoken by LEP customers have you encountered? (select all that apply)” (n=20)



3. The Nature and Importance of Services Provided by Maple Grove Transit to LEP Individuals

Many LEP persons rely on public transportation for their mobility needs. According to DOT LEP guidance, “providing public transportation access to LEP persons is crucial. An LEP person’s inability to utilize effectively public transportation may adversely affect his or her ability to obtain health care, education, or access to employment.” Maple Grove Transit takes seriously the importance of language assistance services for its LEP customers and is committed to providing those deemed necessary based on customer requests and results of the Four Factor Analysis.

4. The Resources Available and Costs to Provide Language Assistance

The City of Maple Grove is prepared to provide language resources upon request. It has been determined that the City could afford professional interpretation and translation services on an as-needed basis. The fixed route pocket schedule and MY RIDE brochures have been identified as the two most important documents to be translated should the need arise, though requests for translation of other documents will be granted. Additionally, the City of Maple Grove is prepared to partner with outside organizations to augment internal capacity and provide necessary services.

Language Assistance Measures

The City of Maple Grove assesses the language assistance resources it makes available based on historical requests and the results of the Four Factor Analysis. There have been no requests for translations or language assistance related to Maple Grove Transit in the last three years.

There is no individual LEP group with over 1,000 people living within the Maple Grove Transit service area. While Maple Grove Transit’s services are important to its LEP customers (Factor three), results of Factors one and two of the Four Factor Analysis have consistently shown that there are relatively few LEP individuals in the service area, and interaction is relatively infrequent.

The City of Maple Grove’s commitment to provide all individuals meaningful access to Maple Grove Transit service. As such the City offers the following language assistance measures.

- Translation, upon request, of vital documents, including Title VI notice and complaint forms, service schedules and brochures, fare information, and rider alerts, by partnering with reputable community organizations and external resources
- Oral interpretation, upon request, for in-person or telephone conversations, by partnering with reputable community organizations and external resources
- Translation and interpretation services for community meetings and public meetings, and associated documents, upon request, through partnership with reputable organizations
- Utilization of bi-lingual staff as available
- The Maple Grove Transit Language Assistance Plan and Title VI Program will be posted on the agency website, www.maplegrovetransit.org

To ensure language assistance strategies remain appropriate, Maple Grove Transit will:

- Monitoring the frequency and nature of staff interactions with LEP customers by documenting requests for services and administering staff surveys
- Maintain a close working relationship with the Metropolitan Council and Metro Transit, and learn from and use their language assistance services, where applicable

Staff Training

The following training will be provided to City of Maple Grove staff members that are directly involved with the Maple Grove Transit services:

- Information on the City of Maple Grove's Language Assistance Plan and Title VI Program
- Description of potential language assistance services offered by Maple Grove Transit to LEP customers and the public
- Instructions on how to handle a potential Title VI or LEP complaint

Additional LEP training is given to staff on a case-by-case basis, based on staff, supervisor, and customer feedback.

Outreach Techniques

Given the small number of LEP individuals in the Maple Grove Transit service area, and the infrequent nature of interaction between the agency and LEP customers, the outreach activities initiated by the City are expected to be minimal. However, the following procedures will be utilized as the need arises:

- The availability of written and oral translation services will be included on the agency website, www.maplegrovetransit.org
- When staff prepares a document, or schedules a meeting, for which the target audience is expected to consist of primarily LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population
- When conducting outreach with community organizations that serve LEP communities, Maple Grove Transit will provide information about current language assistance measures and seek feedback about the adequacy of those measures and other potential measures

Monitoring and Updating the LEP Plan

The City of Maple Grove conducts internal monitoring of its language assistance practices, ensuring that the strategies employed remain effective. This is accomplished primarily through feedback from staff and customers. The City is committed to continuously improving its Language Assistance Plan. To that end, it will revise the plan with more appropriate strategies as needed. In addition, the plan will be reviewed and updated when it is clear that higher concentrations of LEP individuals are present in the Maple Grove Transit service area.

Exhibit A

Log to Record Inquiries for Requests for Interpreters and Requests for Translated Maple Grove Transit Documents.

Date of Inquiry or Request: _____

Request for Interpreter: _____ yes _____ no

- Language _____

Request for Translated Document: _____ yes _____ no

- Language _____
- Name of Document _____

Contact Info for Person Making the Request _____

Summary of Action and Conclusion _____

Exhibit B

Maple Grove Transit – Language Assistance Plan 2020 Survey of Fixed Route Drivers

Maple Grove Transit is updating its *Language Assistance Plan* to help identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services provided by Maple Grove Transit. Such is required to receive Federal financial assistance, in accordance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166 “Improving Access to Services for Persons with Limited English Proficiency.”

One component of Maple Grove Transit’s *Language Assistance Plan* is a driver survey to help determine the number of LEP persons who use Maple Grove Transit and their frequency of use. **An LEP person is defined as person who does not speak English as their primary language and has limited ability to read, speak, write or understand English.**

Please complete the survey by **February 14, 2020** and return to the **MJR Garage Dispatch Office**. Your Driver Badge ID and completion date must be filled in below. Your assistance is greatly appreciated. Thank you.

Survey Questions:

1. In the past three months, do recall coming into contact with LEP bus riders while driving a Maple Grove Transit bus? (Circle one)
a. Yes b. No (If yes, continue to question 2, if no, your survey is complete).
2. If known, which non-English languages spoken by LEP bus riders have you encountered on the Maple Grove buses? (Circle all that apply)
*a. Spanish b. Somali c. Hmong d. Karen e. Russian/Polish/Slavic
f. Vietnamese g. Chinese h. Japanese i. Korean j. Oromo k. Amharic
l. Arabic m. Tagalog n. French o. German p. Other (please list)*
3. On average, how many times per week do you come into contact with LEP bus riders while driving a Maple Grove bus? (Circle one)
a. 0 b. 1 c. 2 d. 3 e. 4 f. 5+
4. On average, how many times per week do you provide assistance to LEP bus riders while driving a Maple Grove bus? (Circle one)
a. 0 b. 1 c. 2 d. 3 e. 4 f. 5+
5. How do you try to communicate with LEP bus riders while driving a Maple Grove bus? (Circle all that apply)
*a. Speaking in their (non-English) Language b. Speaking English Slower c. Hand Gestures
d. Through their Children or Another Person e. Other (please list)_____*

Driver Name and Badge ID # _____

Date Completed _____

**Maple Grove Transit – Language Assistance Plan
2020 Survey of MY RIDE Drivers and Customer Service Reps**

Maple Grove Transit is updating its *Language Assistance Plan* to help identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services provided by Maple Grove Transit. Such is required to receive Federal financial assistance, in accordance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166 “Improving Access to Services for Persons with Limited English Proficiency.”

One component of Maple Grove Transit’s *Language Assistance Plan* is a staff survey to help determine the number of LEP persons who use Maple Grove Transit and their frequency of use. **An LEP person is defined as person who does not speak English as their primary language and has limited ability to read, speak, write or understand English.**

Please complete the survey by **February 14, 2020** and return to **Bill Patten**. Your name or Driver Badge ID and completion date must be filled in below. Your assistance is greatly appreciated. Thank you.

Survey Questions:

1. In the past three months, do recall coming into contact with LEP customers while driving a MY RIDE bus or on the phone as a Customer Service Rep? (Circle one)
a. Yes b. No (If yes, continue to question 2, if no, your survey is complete).

2. If known, which non-English languages spoken by LEP customers have you encountered? (Circle all that apply)
*a. Spanish b. Somali c. Hmong d. Karen e. Russian/Polish/Slavic
f. Vietnamese g. Chinese h. Japanese i. Korean j. Oromo k. Amharic l. Arabic
m. Tagalog n. French o. German p. Other (please list) _____*

3. On average, how many times per week do you come into contact with LEP customers? (Circle one)
a. 0 b. 1 c. 2 d. 3 e. 4 f. 5+

4. On average, how many times per week do you provide assistance to LEP customers? (Circle one)
a. 0 b. 1 c. 2 d. 3 e. 4 f. 5+

5. How do you try to communicate with LEP customers? (Circle all that apply)
*a. Speaking in their (non-English) Language b. Speaking English Slower c. Hand Gestures
d. Through their Children or Another Person e. Professional Interpreter
f. Online Interpretation Service g. Other (please list) _____*

Name or Badge ID # _____
Driver or Customer Service Reps (Circle One)
Date Completed _____

**Maple Grove Transit – Language Assistance Plan
2020 Survey of City of Maple Grove Administration Staff**

Maple Grove Transit is updating its *Language Assistance Plan* to help identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services provided by Maple Grove Transit. Such is required to receive Federal financial assistance, in accordance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166 “Improving Access to Services for Persons with Limited English Proficiency.”

One component of Maple Grove Transit’s *Language Assistance Plan* is a staff survey to help determine the number of LEP persons who use Maple Grove Transit and their frequency of use. **An LEP person is defined as person who does not speak English as their primary language and has limited ability to read, speak, write or understand English.**

Please complete the survey by **February 14, 2020** and return to **Mike Opatz, Transit Administrator**. Your name and completion date must be filled in below. Your assistance is greatly appreciated. Thank you.

Survey Questions:

1. In the past three months, do recall coming into contact (via in-person, phone, or e-mail) with any LEP customers related to your duties with Maple Grove Transit? (Circle one)
a. Yes b. No (If yes, continue to question 2, if no, your survey is complete).

2. If known, which non-English languages spoken by LEP customers have you encountered? (Circle all that apply)
*a. Spanish b. Somali c. Hmong d. Karen e. Russian/Polish/Slavic
f. Vietnamese g. Chinese h. Japanese i. Korean j. Oromo k. Amharic l. Arabic
m. Tagalog n. French o. German p. Other (please list) _____*

3. On average, how many times a week do you come into contact with LEP customers related to Maple Grove Transit? (Circle one)
a. 0 b. 1 c. 2 d. 3 e. 4 f. 5+

4. On average, how many times a week do you provide assistance to LEP customers related to Maple Grove Transit? (Circle one)
a. 0 b. 1 c. 2 d. 3 e. 4 f. 5+

5. How do you try to communicate with LEP customers? (Circle all that apply)
*a. Speaking in their (non-English) Language b. Speaking English Slower c. Hand Gestures
d. Through their Children or Another Person e. Professional Interpreter
f. Online Interpretation Service g. Other (please list) _____*

Name: _____

Date Completed: _____