

Appendix 1

Language Assistance Plan

This Language Assistance Plan has been prepared to address the Minnesota Valley Transit Authority's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills accessing the services offered by MVTA. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

Executive Order 13166, titled Improving Access to Services for Persons with Limited English Proficiency (LEP), indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal transit funds, including MVTA where applicable relating to MVTA services and facilities.

MVTA has developed this Language Assistance Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided by the transit authority. 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.

This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

In order to prepare this plan, MVTA undertook the U.S. DOT four-factor LEP analysis which considers the following:

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter an MVTA program, activity or service.
2. The frequency with which LEP persons come in contact with MVTA programs, activities or services.
3. The nature and importance of programs, activities or services provided by the MVTA to the LEP population.
4. The resources available to MVTA and overall cost to provide LEP assistance.

Four-Factor Analysis:

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter an MVTA program, activity or service.

The Minnesota Valley Transit Authority staff determined, based on 2016-2020 ACS data, that 311,985 persons live in the MVTA Service area (City of Apple Valley – 54,847; City of Burnsville – 62,170; City of Eagan – 65,975; City of Prior Lake – 27,317; City of Rosemount – 25,798; City of Savage – 32,858 and City of Shakopee – 43,020). Based on the 2016-2020 ACS data, a total of 46,307 or 16.5 percent of the persons indicated they speak a language other than English at home.

Language Spoken at Home for Ages 5+ via 2016-2020 ACS

<i>Classification</i>	<i>Population Totals</i>	<i>Percentage of Total</i>
Only English	235,770	83.6%
Other, High English Proficiency	27,795	9.9%
Other, Low English Proficiency	18,512	6.6%
Spanish	4,607	1.6%
Other	4,538	1.6%
Vietnamese	2,241	0.8%
Other Asian/Pacific Island	2,224	0.8%
Russian, Polish, or Other Slavic	1,434	0.5%
Other Indo-European	965	0.3%
Chinese (incl. Mandarin and Cantonese)	812	0.3%
French	575	0.2%
Tagalog	411	0.1%
Korean	306	0.1%
Arabic	282	0.1%
German	115	0.0%

Based on *LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER - Universe: POPULATION 5 YEARS AND OVER*

<https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=CF>

The MVTA also contacted the four primary school districts in the area: 191 (Burnsville-Eagan-Savage), 196 (Rosemount-Apple Valley-Eagan), 720 (Shakopee) and 719 (Prior Lake-Savage) regarding their non-English-speaking populations with the goal of gaining additional context.

In ISD 191, primary languages for households that are non-English speaking are: Somali, Spanish, Russian, Ukrainian, Cambodian, Vietnamese, Lao, Chinese, and Arabic. Efforts to contact this school district for a 2023 update did not receive a response.

In ISD 720, the languages of students who are not fluent in English are: Somali and Spanish are the top two languages spoken. Other languages include Vietnamese, Russian, Ukrainian, & Cambodian (Khmer).

In ISD 719, there are 61 total languages present, with the top 5 non-English languages spoken being: Russian, Spanish, Somali, Vietnamese, and Cambodian (Khmer).

2. The frequency with which LEP persons come in contact with the MVTA programs, activities or services.

The MVTA periodically assesses the frequency with which staff and drivers have, or could have, contact with LEP persons. This includes documenting phone inquiries and surveying vehicle operators. **Exhibit E** includes the most current driver surveys. **Exhibit F** contains the log to record inquiries for requests for interpreters and requests for translated MVTA documents.

The MVTA surveyed its drivers/supervisors again in 2023 (receiving 42 responses) with the following results:

- 14 drivers/supervisors reported no contact with LEP bus riders
- 28 drivers/supervisors reported contact with LEP bus riders

Of the 28 drivers who reported contact with LEP bus riders, they came in contact with an LEP rider an average of 3 times per week, although many riders reported only a single contact per week and others reported multiple contacts per day. Of the 28 drivers who reported contact with LEP bus riders, they provided assistance an average of 2 times per week.

Languages encountered by drivers/supervisors:

- Spanish – 43 percent
- African/Somali – 14 percent
- Chinese – 3 percent
- Japanese – 4 percent
- Vietnamese – 4 percent
- ASL – 4 percent
- Don't know what languages – 43 percent

(totals more than 100 percent because drivers may have reported encounters with more than one language)

An anecdotal review of the Customer Service Database did not indicate significant requests for LEP assistance during the past three years. The Database includes a field to track any LEP comments we received of this nature. Tools used to assist LEP riders includes initiatives such as Google Translate features on the MVTA website, as well as a Language Assistance Line

3. The nature and importance of programs, activities or services provided by MVTA to the LEP population.

There is no single large geographic concentration of any type LEP individuals in the MVTA service area. The overwhelming majority of the population in the Cities of Apple Valley, Burnsville, Eagan, Prior Lake, Rosemount, Savage and Shakopee (MVTA area) speak only English. However, within Dakota and Scott counties and the associated school districts, there are social services, professional and leadership organizations that focus on outreach to LEP individuals. The MVTA provides three transportation services that serve the general public, which include the commuter express, local fixed route and local flex route. These services on a rare occasion may encounter LEP individuals which serves the general public.

4. The resources available to the Minnesota Valley Transit Authority and overall cost to provide LEP assistance.

The MVTA assessed its available resources that could be used for providing LEP assistance, and has determined that it could afford a professional interpreter and translation service on an as-needed basis. Furthermore, MVTA has determined that its pocket schedules would be the most important documents to be translated if the need should arise. In order to participate in the 2016 Shakopee Diversity Fair, MVTA had two informational pieces (general MVTA Information and ‘how to ride’ information) translated into both Spanish and Somali. With the assistance of grant funding, in 2019, MVTA held cultural focus groups and created targeted messages that were distributed through a translated How to Ride one-pager, a television ad on Univision, and an ad placed on 86 screens in local movie theaters. MVTA has the necessary resources and partnerships to assist with future outreach and translation efforts.

In May 2016 the MVTA added a “Language Line” to improve our communication with non-English-speaking customers. Riders call the MVTA and then MVTA adds a language specialist to the phone call (this can also work in person) to translate the question from the individual’s native language to English (allowing the Customer Service Representative to understand the question) and then translates the MVTA Customer Service Representative’s answer from English to the rider’s native language. Information about the Language Line is included in all MVTA Pocket Schedules.

The MVTA website, www.myta.com, makes use of Google Translate, allowing for in the moment translation of any information on the website with dramatically improved Google Translate capabilities. Translated documents in Spanish and Somali will also be available on the website in the same locations as English-language documents.

The amount of staff and driver training that might be needed was also considered. Based on the four-factor analysis, the MVTA developed its LAP Plan as outlined in the following section.

Language Assistance Plan (LAP) Outline

The Minnesota Valley Transit Authority has narrowed down the options to assist LEP individuals to utilize Flex Route, Local Fixed Route and Commuter Express transportation services. Professional interpreter and documented translation services will be provided as needed given the overall low percentage of LEP persons within the MVTA Service Area.

Language Assistance Measures

Although there is a very low percentage in the MVTA Service Area of LEP individuals, that is, persons who speak English “not well” or “not at all”, the Minnesota Valley Transit Authority will ensure that the following measures are in place:

- The MVTA Title VI Policy and Language Assistance Plan will be posted on the agency website at www.mvta.com .
- The Language Line has been implemented.
- Google Translate is available on our website at www.mvta.com.
- If, when conducting a public meeting and an interpreter is needed, staff has a list of resources to provide translation services depending on the language requirement.

Staff Training

The following training will be provided to MVTA staff that is directly involved with the transit services:

- Information on the MVTA’s Title VI Policy and LEP responsibilities.
- Use of the Language Line.
- Documentation of language assistance and document translation requests via Exhibit B.
- How to handle a potential Title VI/LEP complaint.

Outreach Techniques

Due to the small local LEP population, the Minnesota Valley Transit Authority-initiated outreach activities are expected to be minimal, but the following procedure will be utilized as the need arises:

- 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.
- Bus schedules, maps, and other transit publications will be made available online in an alternative language when and if a specific and concentrated LEP population is identified.
- A “How to Ride” guide is currently available on the agency website in both Somali and Spanish.
- MVTA will maintain vital documents pertaining to LEP populations such as consent and complaint forms, intake and application forms, written notices of rights, notice of denials, losses, or decrease in benefits or services, and notice of person’s rights under Title VI

Monitoring and Updating the Language Assistance Plan

The MVTA will update the LAP as required by U.S. DOT. At a minimum, the plan will be reviewed and updated again in three years, when data from the 2020 U.S. Census is available, or when it is clear that higher concentrations of LEP individuals are present in the Minnesota Valley Transit Authority service area.

Dissemination of the MVTA Language Assistance Plan

A link to the Minnesota Valley Transit Authority LAP and the Title VI Plan will be included on the MVTA website, www.mvta.com. Any person or agency with internet access will be able to access and download the plan from the MVTA website. In addition, the MVTA web-site

includes the Google Translate options, which allows translation of items on the web-site into numerous alternative languages. Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail, or in person, and shall be provided a copy of the plan at no cost. LEP individuals may request copies of the plan in translation which the MVTA will provide, if feasible. Questions or comments regarding the LAP may be submitted to the MVTA as follows:

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