Title VI Plan

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*The MVTA Board of Commissioners and board subcommittees are made up of elected representatives that are appointed by MVTA member cities and counties. The current demographic profile of the board consists of 9 members, the majority of whom identify as white, with a gender distribution of 6 male and 3 female members.

Table of Contents

Sections

	Page
Section I. Introductions/Plan Statement	3
Section II. Title VI Information Dissemination	3
Section III. Subcontracts and Vendors	4
Section IV. Record Keeping	4
Section V. Title VI Complaint Procedures	4
Section VI. Language Assistance Plan (LAP)	6
Section VII. Public Participation Plan	7
Section VIII. Policy Development	9
Section IX. Systemwide Standards	9

Appendices

Appendix 1: Language Assistance Plan	15
Appendix 2: Major Service Change Policy	21
Appendix 3: Disparate Impact/Disproportionate Burden Policy	22

Exhibits

Exhibit A: List of Locations with Title VI Notices	23
Exhibit B: Acknowledgement of Receipt of Title VI Plan	25
Exhibit C: Title VI Complaint Form	26
Exhibit D: Log of Title VI Complaints	28
Exhibit E: Language Assistance Plan Surveys	32
Exhibit F: Log to Record Inquiries for Requests for Interpreters and Requests for Translated MVTA Documents	34
Exhibit G: Log of MVTA Board Action	35
Exhibit H: MVTA Demographic Profile and Maps	36
Exhibit I: Non-Elected Groups and Committees Convened by MVTA	38
Exhibit J: Results and Board Meeting Minutes of Equity Analyses for Major Service Changes	39
Exhibit K: History of MVTA Title VI Plan Revisions	41

I. Introduction / Plan Statement

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "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" (42 U.S.C. Section 2000d).

Minnesota Valley Transit Authority (MVTA) is committed to ensuring that no person is excluded from participation in, or denied the benefits of, transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.B. This plan was developed to guide MVTA in administration and management of Title VI-related activities.

Title VI Manager Contact information:

Luther Wynder
Chief Executive Officer
Minnesota Valley Transit Authority
100 E. Highway 13
Burnsville, MN 55337
Phone: 952-882-7500

II. Title VI Information Dissemination

- Title VI information posters shall be prominently and publicly displayed in MVTA facilities and on their revenue vehicles. The name of the Title VI Manager is available on the website, at www.mvta.com. **Exhibit A** includes a list of locations where the MVTA Title VI notice is posted.

- All employees shall be provided a copy of the Title VI Plan and are required to sign the Acknowledgement of Receipt (see **Exhibit B**).

- Title VI information shall be disseminated to MVTA annually via employee bulletin boards and in payroll envelopes. This process reminds employees of the MVTA's policy statement, and of their Title VI responsibilities in their daily work and duties.

- During New Employee Orientation, new employees shall be informed of the provisions of Title VI, and MVTA's expectations to perform their duties accordingly and be provided a copy of the Title VI Plan and are required to sign the Acknowledgement of Receipt (see **Exhibit B**).

III. Subcontracts and Vendors

All subcontractors and vendors who receive payments from Minnesota Valley Transit Authority where funding originates from any federal assistance are subject to the provisions of Title VI of the Civil Rights Act of 1964 as amended.

Written contracts shall contain non-discrimination language, either directly or through the bid specification package which becomes an associated component of the contract.

IV. Record Keeping

The Title VI Manager will maintain permanent records, which include, but are not limited to, signed acknowledgements of receipt from the employees indicating the receipt of the Title VI Plan, copies of Title VI complaints or lawsuits and related documentation, records of correspondence to and from complainants, and Title VI investigations.

V. Title VI Complaint Procedures

Any person who believes that they, individually, as a member of any specific class, has been subjected to discrimination prohibited by Title VI of the Civil Rights Act of 1964, as amended, may file a written complaint with MVTA. A complaint may also be filed by a representative on behalf of such a person. All complaints will be referred to MVTA's CEO for review and action.

In order to have the complaint considered under this procedure, the complainant must file the complaint no later than 180 days after:

- The date of the alleged act of discrimination; or
- The date when the person(s) became aware of the alleged discrimination.
- Where there has been a continuing course of conduct, the date of the most recent occurrence

MVTA may extend the time for filing or waive the time limit in the interest of justice, specifying in writing the reason for doing so.

Complaints shall be in writing and shall be signed by the complainant and/or the complainant's representative. Complaints shall set forth as fully as possible the facts and circumstances surrounding the claimed discrimination. In the event that a person makes a verbal complaint of discrimination to a Board member or employee of MVTA, the person shall be interviewed by the CEO or their designee. If necessary, the CEO or designee will assist the person in reducing the complaint to writing and submit the written version of the complaint to the person for signature. The complaint shall then be processed in accordance with established procedures.

Within 10 days, the CEO or designee will acknowledge receipt of the allegation, inform the complainant of action taken or proposed action to process the allegation, and advise the complainant of other avenues of redress available, such as the Federal Transit Administration (FTA). Please note that in responding to any requests for additional information, a complainant's failure to provide the requested information may result in the administrative closure of the complaint.

The complaint should include the following information:

- Name, address and phone number of the complainant.
- Name(s) and address(es) of alleged discriminating official(s).
- Basis of complaint (i.e., race, color, national origin, sex, age, disability).
- Date of alleged discriminatory act(s).
- Date of complaint received by MVTA
- A statement of the complaint.
- Other agencies (State, local or Federal) where the complaint has been filed.

The investigation will be conducted in a full, fair and impartial manner by the CEO or designee. Results of the investigation will be presented to the Minnesota Valley Transit Authority Board of Directors for a determination. Every effort will be made to respond to Title VI complaints within 60 working days of receipt of such complaints. Complaints will be determined to be substantiated, not substantiated or inconclusive. Following the investigation, the MVTA will send a final written response letter to the complainant identifying the final determination. In the letter notifying complainant that the complaint is not substantiated the complainant will be advised of their right to:

1. appeal within seven calendar days of receipt of the final written decision from, and/or
2. file a complaint externally with the U.S. Department of Transportation and/or the FTA.

In addition to the complaint process described above, a complainant may file a Title VI complaint with the following offices:

Federal Transit Administration Office of Civil Rights
Attention: Complaint Team
East Building, 5th Floor – TCR
1200 New Jersey Ave., SE
Washington, DC 20590

As noted above, within 60 working days, the CEO or designee will conduct and complete an investigation of the allegation and based on the information obtained, will render a recommendation for action in a "Report of Findings," including an explanation of the actions MVTA has taken or proposed to resolve the issue raised in the complaint. The complaint should be resolved by informal means whenever possible. Such informal attempts and their results will be summarized in the Report of Findings.

Should a formal process be required, the complainant has the right to be represented by an attorney or other representative of their own choosing. A date/time will be scheduled to accommodate the right of the complainant to bring witnesses and present testimony and evidence. As with the informal process, within 60 days, the CEO or designee will conduct and complete an investigation of the allegation and based on the information obtained, will render a recommendation for action in a "Report of Findings," including an explanation of the actions MVTA has taken or proposed to resolve the issue raised in the complaint.

Within 90 days of receipt of the complaint, the CEO or their designee will notify the complainant in writing of the final decision reached, including the proposed disposition of the matter. The notification will advise the complainant of their appeal rights if they are dissatisfied with the final decision rendered by MVTA.

The Title VI complaints are to be submitted in writing to:

Luther Wynder
Chief Executive Officer
Minnesota Valley Transit Authority
100 E. Highway 13
Burnsville, MN 55337
Phone: 952-882-7500
Email: mvta@mvta.com

It is the responsibility of the complainant to certify all mail that is sent through the U.S. Postal Service and/or ensure that all written correspondence can be tracked. For complaints originally submitted by facsimile, an original, signed copy of the complaint must be mailed to the CEO as soon as possible, but no later than 180 days from the alleged date of discrimination.

All complaints alleging discrimination based on race, color or national origin in a service or benefit provided by the MVTA will be directly addressed by the MVTA and shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. In addition, Executive Order 12898 (Environmental Justice) prohibits discrimination based on income status. Additionally, MVTA shall make every effort to address all complaints in an expeditious and thorough manner.

See **Exhibits C and D** for the MVTA Complaint Form and a Log of Title VI Complaints.

VI. Language Assistance Plan (LAP)

The Minnesota Valley Transit Authority has developed a Language Assistance Plan (LAP) to help identify reasonable steps to provide language assistance for Limited English Proficiency (LEP) persons seeking meaningful access to MVTA services including Flex Route, Local Fixed Route, Commuter Express, Guaranteed Ride Home and other transportation services as required by Executive Order 13166. A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training staff, how to notify LEP persons that assistance is available, and information for future plan updates. In developing the plan, the MVTA undertook a U.S. Department of Transportation four factor LEP analysis which considered the following:

1) number or proportion of LEP persons eligible in the MVTA service area who may be served by or likely to encounter a Minnesota Valley Transit Authority program, activity, or service;
2) frequency with which LEP individuals come in contact with MVTA services;
3) nature and importance of the program, activity or service provided by MVTA to the LEP population; and

4) resources available to the MVTA and overall cost to provide LEP assistance. A brief description of these considerations is provided in the following section.

See **Appendix 1** for a copy of the LAP. See **Exhibits E and F** for LEP surveys and a Log of Requests for Interpretation / Translation.

VII. Public Participation Strategy

In accordance with Minnesota Valley Transit Authority's (MVTA) Title VI Plan and FTA Circular 4702.1B, this outreach strategy ensures that all major proposed service or fare changes are communicated equitably and that meaningful opportunities for public input are provided before Board action and/or implementation of proposed changes. The approach emphasizes inclusion of minority, low-income, and Limited English Proficient (LEP) populations in the decision-making process.

When major service or fare changes are proposed*, MVTA will complete the following actions/processes:

1. A written overview of the proposed changes and their purpose(s). This overview will also include route numbers and descriptions in addition to details on language and ADA accommodations.

2. Provision of 30-day comment period for public feedback.

3. Public notification strategies:
    a. MVTA website news story
    b. Onboard notices on buses and at relevant transfer points
    c. Digital communication through:
        i. Social media
        ii. E-newsletters
        iii. Partner e-blasts
        iv. Digital signage
        v. Infotainment
    d. On-bus interviews with riders
    e. Physical meeting options aligning with LEP needs to consider meeting location, times, and accessibility.
    f. Virtual meetings and/or recording overviewing changes
    g. Meetings with stakeholders
    h. Flyers at community access points impacted
    i. Press release(s)

4. MVTA will offer several comment method formats to improve access:
    a. Online survey
    b. Interactive map comment opportunities
    c. MVTA phone number for Customer Service
    d. Written/emailed submission options
    e. Notice to provide written comment for government partners and stakeholders

f. In-person comment options during pop-up sessions and ride-alongs

5. For community and stakeholder engagement, MVTA will work to speak directly with government and agency partners, community access points, major employers, education partners, and its South Metro Transit Coalition of businesses.

6. Prior to Board action, MVTA staff will prepare a public outreach summary report with:
    a. Description of outreach methods and timeline
    b. Copies of all notices and materials
    c. Summary of all feedback received (quantitative and qualitative)
    d. Documentation of how public input influenced final recommendations
    e. Title VI determination and any required Disparate Impact/Disproportionate Burden analysis for affected routes.

7. MVTA staff will present the information to its Board of Commissioners for formal discussion and approval.

8. MVTA will submit final Title VI reports as required to the Metropolitan Council.

MVTA also commits to conducting regular outreach outside of proposals for major changes, including biennial systemwide surveys, targeted surveys for specific service types, on-board conversations with riders, and more. These additional interactions help MVTA understand rider needs to incorporate into future changes.

*NOTE: MVTA will only conduct a comment period on fare changes under its authority. Fare policy for fixed routes are determined by regional policy through the Metropolitan Council.

Engagement with Minority and LEP Populations

MVTA is committed to ensuring meaningful engagement with minority and Limited English Proficiency (LEP) populations through intentional, inclusive, and equity-focused outreach practices. The agency partners with community-based organizations, educational institutions, and local governments to connect with underrepresented populations and gather input that informs service planning and decision-making. These partnerships help identify community needs, preferred communication channels, and effective engagement strategies.

To reduce barriers to participation, MVTA translates key documents and public engagement materials into commonly spoken languages within its service area, including those identified under its Title VI program, and ensures that surveys and feedback tools are accessible to non-English speakers. The agency also conducts travel trainings in collaboration with service organizations, schools, and community groups to educate individuals on how to access and use MVTA services. Additionally, MVTA engages directly with riders and community members through in-person events, tabling, and targeted outreach efforts, including coordination with organizations that serve low-income and vulnerable populations to provide transit education, resources, and capacity-building support.

MVTA further supports accessibility for LEP populations by offering website and mobile app functionality that can be automatically translated into multiple languages, enabling users to more easily navigate services, access real-time information, and utilize trip planning tools with greater

confidence and independence. This commitment extends to feedback collection, as MVTA leverages its auto-translating website alongside user-friendly tools such as interactive maps and visual input platforms that allow individuals to share insights and identify needs without relying solely on written language, ensuring more inclusive and accessible community input.

Through these efforts, MVTA proactively seeks to eliminate disparities in access, avoid disparate impacts, and ensure that all populations regardless of race, income, or language proficiency have the opportunity to participate in shaping a more accessible and connected regional transportation system. These efforts are evaluated periodically to ensure they are effectively reducing barriers to participation.

VIII. Policy Development

Effective October 1, 2012, FTA Circular 4702.1B requires transit providers, located in urbanized areas of more than 200,000 who receive federal funding and operate at least 50 peak vehicles, to develop two new policies:

1) A Major Service Change Policy, with thresholds that determine when a service equity analysis is required; and,
2) A Disparate Impact/Disproportionate Burden Policy, with thresholds that measure adverse impacts on minority and low-income populations.

The Minnesota Valley Transit Authority partnered with Metropolitan Council/Metro Transit and SouthWest Transit to develop the policies in **Appendix 2 and Appendix 3**.

The Major Service Change and Disparate Impact/Disproportionate Burden policies are based on existing practices used by Metropolitan Council and were reviewed by eight local advocacy groups. Additionally, policies used by transit agencies across the county were considered, including Los Angeles, CA; Washington, D.C.; Fort Worth, TX; Houston, TX; Atlanta, GA; and Portland, OR.

Local public participation was available through five public hearings that were held across the region in February 2013. Comments were accepted by e-mail, fax, mail, and/or phone, with the public comment period closing 10 days after the last public hearing. Details of the proposed policies and public hearings were also made available on: MVTA's website, in the *State Register*, *Star Tribune*, *Pioneer Press*, *Finance & Commerce*, *Capitol Report*, *Anoka County Union*, *Waconia Patriot*, *Rosemount Town Pages*, *Shakopee Valley News*, *Lillie Suburban Newspaper*, *Asian American Press*, and the *MN Spokesman Recorder*. A total of five people attended the public hearings and comments were received from seven people; although, some comments did not specifically relate to the proposed Title VI policies.

IX. Systemwide Standards

FTA requires transit providers to set service standards for a variety of different factors. The Metropolitan Council establishes a set of service standards and policies to guide the provision of transit service in the Twin Cities region. In many instances, MVTA maintains the same service standards and policies established by the Metropolitan Council for the region's transit providers. However, MVTA does vary in a few select areas, with MVTA standards as follows:

- Vehicle load
- Service frequency
- On-time performance
- Service availability
- Transit amenities
- Vehicle assignment

MVTA remains committed to advancing equity in transit service delivery and ensuring that all policies, programs, and investments are implemented in a manner that avoids disparate impacts and promotes inclusive access for all populations.

Transit Market Areas and Route Types

Several of the Metropolitan Council's service standards and policies are dependent on both the geographic location of the service and the type of route serving an area. Transit market areas are a tool used by the Metropolitan Council to guide transit planning decisions. The 2050 Transportation Policy Plan defines unique transit market areas using the demographic and urban design factors that are most associated with successful local, regular-route transit.

As a suburban transit provider, MVTA's service area primarily operates in Market Areas III and IV, which are suburban and suburban edge communities characterized by "lower density and less transit-supportive street networks" than the core city, but still have some pockets of dense development. The Transportation Policy Plan cites the typical service types as suburban local, commuter service, and non-regular route service.

Due to MVTA's suburban nature, MVTA only operates within two of the route types defined in the region:

- **Suburban Local Bus** routes typically operate in Market Areas II and III and serve an important role in providing basic transit coverage throughout the region. This includes suburb-to-suburb connections and linking urban and suburban communities.
    - **MVTA Routes:** 420, Orange LINK (425), 436, 440, 442, 444, 445, 446, 447, 489, 4FUN (495), 497, 499

- **Commuter and Express Bus** mostly operate during peak periods, serving commuters going to either downtown, the University of Minnesota campus, or to a major employment center. These routes typically operate on highways for portions of the route between picking up passengers at a few stops in residential areas or Park & Ride facilities. They perform best when they serve compact areas without free and/or plentiful parking, and when transit travel times are competitive with driving alone.
    - **MVTA Routes:** 460, 465, 470, 472, 475, 477, 480, 484, 490, 493

Vehicle Load

MVTA's maximum load standards are shown in Table 1. Vehicle load standards consider the seating capacity of various bus types, route type, and time of day. Seating availability is important to a positive transit experience, but may not be feasible during some time periods. Standing loads are acceptable in some instances (peak service, event services). The maximum capacity of the vehicle should not be surpassed, and MVTA will monitor for services that regularly exceed the seating capacity of the vehicle. If seating capacity is regularly exceeded, MVTA will adjust service as resources allow.

Table 1: MVTA Vehicle Load Standards

Route Type	Bus Type	Seated Capacity	Standing Capacity	Total Capacity
Commuter/Express	40’ Bus	39	36	75
	45’ Coach Bus	57	16	73
Suburban Local	40’ Bus	39	36	75
	30’ Bus*	23	7	30
	Cutaway*	14	10	24

*As of April 2026, MVTA does not operate any 30 foot or cutaway buses on local fixed route services. However, MVTA expects to operate these vehicle types within the next three years.

Service Frequency

MVTA aligns with regional standards for service frequency in Transit Market areas III, IV, and V. Table 2 reflects those standards below:

Table 2: Metropolitan Council + MVTA Service Frequency Standards

Route Type	Market Area III	Market Area IV	Market Area V
Suburban Local Bus	60” peak 60” off-peak 60” weekend	NA	NA
Commuter Express Bus	Peak – 3 trips	Peak – 3 trips	NA

On-Time Performance

On-time performance is measured in two methods by MVTA. First, MVTA monitors on-time performance by the number of missed trips. Missed trips is defined as trips that do not start or arrive 30 minutes or more after the scheduled time. This measure is used to evaluate overall service reliability. Incentives may be provided for contracted services if one or less missed trips occur within a given quarter.

MVTA also monitors on-time performance through an automated vehicle locator (AVL) system. Services are defined as on-time if they are between less than one minute early and less than four minutes late. MVTA’s standard is 80% on-time performance on each route, with flexibility allowed for seasonal conditions and construction impacts. MVTA also has a goal to reach 90% on-time performance, with monitoring and changes to try and reach that goal.

Service Availability

MVTA utilizes both regional standards adopted by the Transportation Policy Plan and contextual information provided by city and community partners to determine service availability. MVTA monitors service availability in two forms: span of service and stop spacing.

Span of Service

MVTA uses Metropolitan Council guidelines for span of service as a guideline, in addition to understanding the specific context of the community and rider needs, to determine span of service. Metropolitan Council guidelines are provided in Table 3 below:

Table 3: Metropolitan Council + MVTA Span of Service Guidelines

Route Type	Weekday Peak	Weekday Midday	Weekday Evening	Weekday Owl	Weekends and Holidays
Suburban Local	Always provided	Always Provided	Occasionally Provided	Provided as Demand Warrants	Occasionally Provided
Commuter and Express	Always provided	Occasionally Provided	Provided as Demand Warrants	Provided as Demand Warrants	Provided as Demand Warrants

Stop Spacing

In a suburban context, stop spacing needs to balance the maximum walking distance a rider is willing to travel to reach a stop (typically measured as ¼ mile) with the multimodal access and facilities available for riders. MVTA follows Metropolitan Council guidelines for stop spacing, while understanding that some circumstances (high-speed roads, lack of sidewalk/trail access) may prevent MVTA from reaching those guidelines. Table 4 displays the Metropolitan Council guidelines for Suburban Local and Commuter and Express service types.

Table 4: Metropolitan Council + MVTA Stop Spacing Guidelines

Route Type	Typical Stop Spacing
Suburban Local Bus	1/8 to ½ mile
Commuter and Express and Reverse Commute	Market specific**

Transit Amenities

MVTA coordinates the installation of transit amenities with partner cities and counties. Cooperatively, these agencies install and maintain four categories of facilities within MVTA's service area:

- **Designated bus stops** which consist of a bus stop sign. Designated bus stops are currently available on all suburban local routes. Benches are installed by an external vendor at the request of cities/counties.

- **Bus shelters** which must have a concrete pad, an overhead shelter, and route schedule information posted.

Bus shelters are installed by MVTA based on passenger boardings and local development plans as well as at locations that are high profile, require improved safety, improve ADA access, and/or serve transit dependent populations. MVTA also uses a threshold of more than 20 boardings/day as a guideline when considering shelter locations.

- **Transit stations** are climate-controlled, enclosed facilities with seating, trash receptacles, lighting, bike racks, and video surveillance. They are ADA accessible and have route schedule information posted. Restrooms may also be available at these locations, with hours determined by coordination between MVTA and city and county partners.

- **Park and rides** provide an overhead shelter but may not be completely enclosed, trash receptacles, lighting, bike racks, are ADA accessible, and have schedule information posted.

Vehicle Assignment

MVTA currently operates two vehicle types on fixed routes, but does anticipate two additional vehicle types to be used on fixed route fleets in the near future.

- **Coach buses** are used on express routes serving either Downtown Minneapolis, Downtown St. Paul, or the University of Minnesota. Although coach buses are accessible and lift-equipped, an effort is made to avoid using them on trips with regular wheelchair users due to the narrow aisle configuration and length of time it takes to deploy the lift. Coach buses are assigned to specific blocks based on ridership patterns.
    - MVTA will be receiving **low-floor entry coach buses** in 2026, which will be an improved option for express trips with wheelchair users
- **Standard 40' buses** are primarily used on local fixed and suburb-to-suburb routes. MVTA also uses these vehicles on express routes with lower ridership or enhanced accessibility needs.
- **Smaller vehicles** (either 29' vehicles or cutaways) are not currently used by MVTA on fixed routes. However, MVTA may use these vehicles in the future on local or suburb-to-suburb routes with ridership below the maximum seating load of these vehicles.

Title VI evaluation

Bus age is used as the standard measure for determining equitable vehicle assignment. MVTA regularly cycles vehicles between different routes, which aims to minimize any potential for inequities between minority and non-minority routes.

Microtransit

Microtransit is an app-based service that provides on-demand transit service within a zone. This service picks riders up and drops riders off at requested points at a lower price than comparable private-sector travel options. MVTA currently operates this service as MVTA Connect, and the service is a growing portion of MVTA's service provided.

Microtransit standards are not currently required by the FTA through Title VI. However, MVTA aims to maximize accessibility of the service and keep the customer experience balanced between the three MVTA Connect zones (Eagan Zone; Main Zone; Shakopee/Prior Lake Zone). In addition, MVTA has collaborated with the Metropolitan Council on an ongoing process to establish a Regional Microtransit Policy Framework, which will provide additional guidance on microtransit services in the Twin Cities region.

MVTA will continue evaluating microtransit services to ensure equitable access and outcomes for minority and low-income populations as the service expands.

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 2019-2023 ACS data, that MVTA's service area population totals 301,074. Based on the 2019-2023 ACS data, a total of 46,307 or 16.5 percent of the persons indicated they speak a language other than English at home. Of that group, over 7,000 residents in MVTA's service area reported speaking English less than "well", showing a potential gap in accessibility for a significant portion of MVTA's service area population.

Language Spoken at Home 2019-2023 ACS 5-Year Estimate

Language	Total Population	Percent of Population
English Only	251,389	83.5%
Other, Speaks English well or very well	42,494	14.1%
Other, Speaks English less than well	7,191	2.4%
Spanish	15,927	5.3%
Other Indo-European Languages	7,705	2.6%
Asian and Pacific Island Languages	14,014	4.7%
Other Languages	12,039	4.0%

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

To better understand the frequency and nature of interactions with riders who have Limited English Proficiency, MVTA conducted a survey of operators in February 2026. A total of 46 operators responded. Below is a summary of data obtained through that survey:

Frequency of Contact:

The survey demonstrated that many operators are in regular contact with LEP riders. This is important because it showcases how language access/barriers are an operational consideration regularly.

- 80.4% of operators reported interacting with LEP riders within the past 30 days.
- Nearly half of operators (42.2%) encounter LEP riders at least 1–2 times per week or more frequently.
- Approximately 24.4% reported encountering LEP riders daily or almost daily.

Types of Assistance:

Operators who interacted with LEP riders were most often assisting with:

- Fare payment assistance (26%)
- Stop location or destination guidance (25%)

- Route or schedule information (21%)
- Use of gestures or visual aids (16%)
- Transfer information (12%)

Some operators also noted that they use mobile translation applications like Google Translate to communicate with their riders. It was specified that some of the operators secure the vehicles to use phone tools, but riders are often using their own phones to assist in the communication process. It would be valuable to have more tools to help with interactions on service and fare questions.

Languages Encountered:

Operators shared non-English languages which they interact with on service. Below the most frequently identified are listed. The most encountered by MVTA staff are Spanish and Somali.

- Spanish (47%)
- Somali (27%)
- Arabic (8%)
- Hmong (5%)
- Vietnamese (5%)
- Chinese (3%)
- French (3%)
- Russian (1%)

Adequacy of Tools:

Operators were asked if they feel they have tools and resources to assist LEP riders. The majority noted that their existing options are only partially sufficient. 1/3 of respondents indicated that they do not feel they have sufficient tools.

- 14% responded “Yes”
- 53% responded “Somewhat”
- 33% responded “No”

Operator Recommendations (Open-Ended):

Operators were able to share any suggestions to improve communication with LEP riders. Their recommendations are included below.

- On-board translation tools or apps (e.g., Google Translate on driver tablets)
- Pre-programmed multilingual audio prompts (particularly Spanish)
- Translated common phrase sheets for drivers
- Improved multilingual signage, including fare, route, and policy information
- More visual route guides and graphics

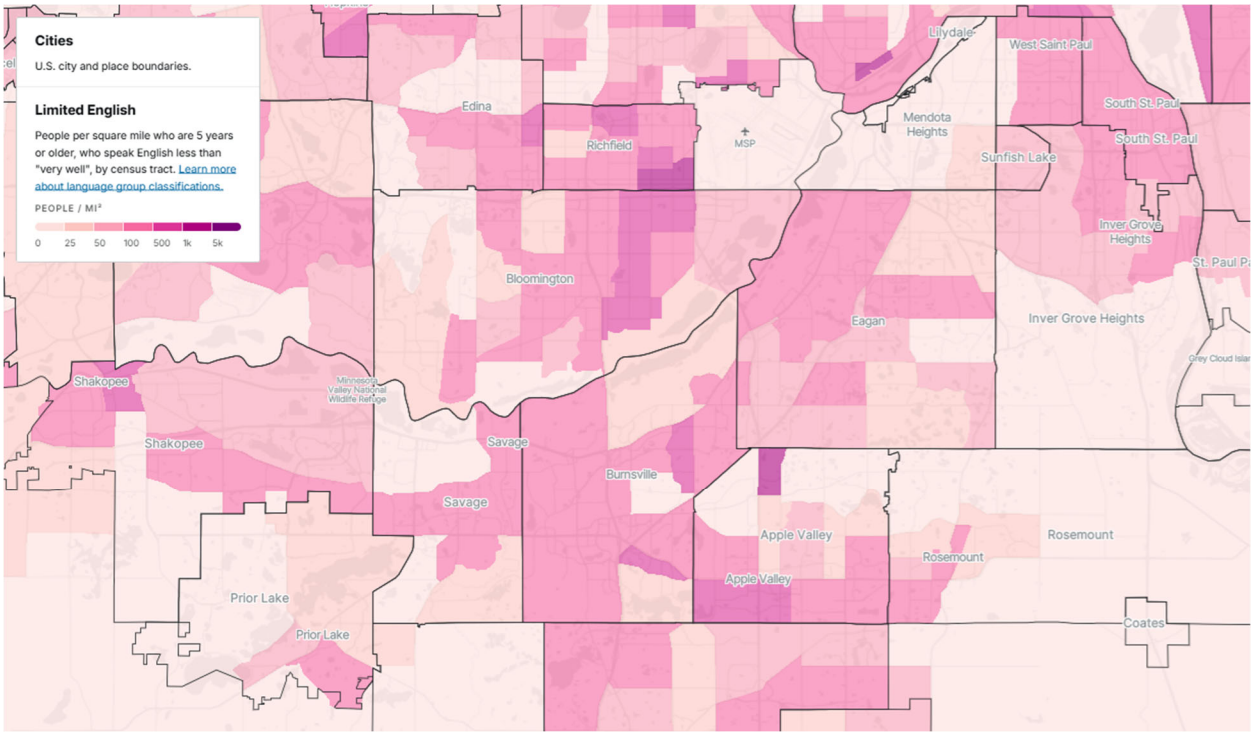
Summary of Findings:

Results of the February 2026 operator survey indicate that interactions with riders who have Limited English Proficiency are common across MVTA’s service area. More than 80 percent of operators reported assisting LEP riders within the past 30 days, with many encountering LEP riders weekly or more frequently. The most common assistance provided involves fare payment, route and schedule information, and stop or destination guidance. Spanish and Somali were identified as the most frequently encountered non-English languages. While operators routinely make efforts to assist LEP riders (often relying on gestures, visual aids, or personal mobile

translation applications) only a small percentage reported having fully adequate tools to do so. A majority indicated that existing resources are only somewhat sufficient or insufficient, highlighting the need for improved agency-supported language access tools, translated materials, visual aids, and on-board translation resources to ensure meaningful access to transit services.

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

MVTA's services provide important transportation options to LEP communities in the Twin Cities metropolitan area. Most of the population in all MVTA member cities speak only English, with the highest concentration in Rosemount (90.3%) and the lowest concentration in Shakopee (74.9%). However, LEP individuals and households do reside, work, and otherwise travel within Dakota and Scott counties and regularly use MVTA services (as shown in MVTA's LEP survey for operators). Throughout MVTA's service area and across MVTA's services, operators and staff do engage with LEP individuals on a regular basis.



Map of MVTA service area and concentration of limited English proficiency populations.

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

MVTA currently uses multiple methods to provide assistance to LEP populations and maintain an adequate level of service. First, MVTA uses online translators to support basic information dissemination, including on MVTA's website. In addition, MVTA has used external translators on specific occasions to translate important documents and surveys. Finally, MVTA has particular staff with varying levels of Spanish proficiency, which have been used to communicate with customers and community members in a variety of situations.

Costs for translation of documents can be significant over time, so MVTA has focused current efforts on utilizing online translation when it is feasible and effective. During situations where MVTA is more directly looking to engage with LEP communities or translate a particularly important document, MVTA has utilized external translation services to ensure accuracy and cultural context in the translation of documents or surveys.

Language Assistance Plan (LAP) Outline

Minnesota Valley Transit Authority aims to support LEP populations across all MVTA services. Website and other virtual translation is available, and MVTA endeavors to translate documents of the highest importance, as well as key surveys and feedback opportunities.

Language Assistance Measures

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 .
- Google Translate is available on the MVTA website
- 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.
- Translation will be provided on all biennial global surveys, and other key documents as feasible

Staff Training

MVTA provides resources to staff that may directly engage with LEP populations:

- Information on MVTA's Title VI Policy and LEP responsibilities.
- How to handle a potential Title VI/LEP complaint.
- Information on where translated documents are available: both online and at MVTA facilities

Outreach Techniques

MVTA aims to work with LEP populations and provide ample opportunity for LEP populations to provide feedback on MVTA services, including through the following measures:

- MVTA will create translated documents for use when directly engaging with a particular LEP population, including but not limited to biennial global surveys
- Bus schedules, maps, and other transit publications will be made available online in key diagnosed LEP languages
- 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 triennially, when MVTA's Title VI Plan is updated.

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 website includes Google Translate. Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail, or in person, and shall be provided with 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:

Luther Wynder
Chief Executive Officer
Minnesota Valley Transit Authority
100 E. Highway 13
Burnsville, MN 55337
Phone: 952-882-7500
Email: mvta@mvta.com

Appendix 2

Minnesota Valley Transit Authority (MVTA)
Major Service Change Policy
- Effective March 27, 2013 -

The Federal Transit Administration's (FTA) updated Circular 4702.1B includes new requirements that all transit providers, in an urbanized area of more than 200,000 who receive federal funding and operate at least 50 peak vehicles, establish a policy defining the threshold used to identify a major service change. The major service change threshold is used to determine when a more detailed, service equity analysis is required. All increases or decreases in fixed route service that meet the major service change threshold require a Title VI Equity Analysis prior to implementation, which must be presented to MVTA's Board for consideration and recorded in MVTA's Title VI Plan.

Further, the FTA requires public engagement in the decision-making process used to develop this policy. The major service change policy will be approved by the MVTA Board and incorporated into MVTA's Title VI Plan.

Major Service Change Thresholds

In support of a regional approach to developing a major service change policy, MVTA recommends adopting criteria in collaboration with the Metropolitan Council. Due to differences in system size and service types, the criteria below includes slight modifications that best reflect MVTA's service area.

A major service change meets at least one of the following criteria:

a) An existing route or set of routes, with one or more net increases or decreases within a 12 month period of more than a 25% change in the daily in-service hours.
b) A new route in a new coverage area.
c) A system-wide restructuring of transit service.
d) Elimination of a transit route without alternate service or a fixed route replacement.

The following service changes are exempt:

a) Seasonal service changes.
b) Route number or branch letter designation.
c) Any change or discontinuation of a demonstration route within the first 24 months of operation.
d) Changes on special service routes such as State Fair, sporting events, and special events.
e) Route changes caused by an emergency. Emergencies include, but are not limited to, major construction, labor strikes, and inadequate fuel supplies.
f) Any service change that does not meet the conditions of a major service change as defined above.

Appendix 3

Minnesota Valley Transit Authority (MVTA)
Disparate Impact and Disproportionate Burden Policy
- Effective March 27, 2013 -

The Federal Transit Administration's (FTA) updated Circular 4702.1B includes new requirements that all transit providers, in an urbanized area of more than 200,000 who receive federal funding and operate at least 50 peak vehicles, develop a policy for measuring disparate impacts and disproportionate burdens. The policy must include a threshold for determining when:

1) Adverse impacts are borne disproportionately by minority or low-income populations; and,
2) Benefits are not equitably shared by minority or low-income populations.

Further, the FTA requires public engagement in the decision-making process used to develop this policy, which will be approved by the MVTA Board and incorporated into MVTA's Title VI Plan. The policy and threshold will be used to determine if a proposed fare change, major service change, or the triennial monitoring review of system-wide standards and policies shows evidence of potential disparate impacts and/or disproportionate burdens.

Four-Fifths Rule

In support of a regional approach to developing disparate impact and disproportionate burden policies, MVTA will use the "four-fifths" rule. The "four-fifth's" rule states that there could be evidence of a disparate impact or disproportionate burden if:

- Benefits are being provided to minority or low-income populations at a rate less than 80% (four-fifths) of the benefits being provided to non-minority or non-low-income populations.

- Adverse effects are being borne by non-minority or non-low-income populations at a rate less than 80% (four-fifths) of the adverse effects being borne by minority or low-income populations.

If a potential disparate impact for minority populations is found, the FTA requires agencies to analyze alternatives. A transit provider may modify the proposed change to avoid, minimize, or mitigate potential disparate impacts. A transit provider may proceed with the proposed change if there is substantial legitimate justification and no alternatives exist that would have a less disparate impact but still accomplish the provider's legitimate program goals.

If a potential disproportionate burden on low-income populations is found, the FTA requires recipients to take steps to avoid, minimize or mitigate impacts where feasible and describe alternatives to passengers affected by service or fare changes.

Exhibit A

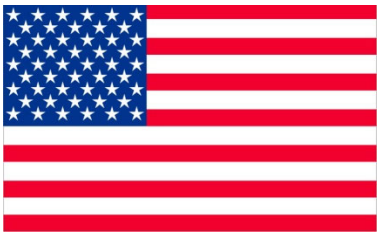
List of Locations with Title VI Notice

Location	Date Posted
157th Street Station	March 2023
Apple Valley Transit Station	March 2023
Blackhawk Park & Ride	March 2023
Burnsville Bus Garage	March 2023
Burnsville Transit Station	March 2023
Eagan Bus Garage	March 2023
Eagan Transit Station	March 2023
Heart of the City Park & Ride	March 2023
Lakeville Cedar Park & Ride	March 2023
Palomino Hills Park & Ride	March 2023
Rosemount Transit Station	March 2023
Savage Park & Ride	March 2023
Southbridge Crossings Park & Ride	March 2023
Eagle Creek Park & Ride	March 2023
Marschall Road Transit Station	March 2023

Updated: March 2026

Image 1: Example of Title VI Notice Posted on a Vehicle

As of March 2026, all MVTA vehicles contain Title VI notice.



Your Rights under Title VI of the Civil Rights Act of 1964

Minnesota Valley Transit Authority (MVTA) pledges that you will have access to all our programs, services and benefits without regard to race, color, national origin, sex, age, disability or socioeconomic status. MVTA will not tolerate discrimination by its employees or entities it contracts with for products and services. MVTA prohibits all discriminatory practices that may result in an individual:

- Being denied any service, financial aid or benefit provided under a program to which he or she may be otherwise entitled.
- Being held to different standards or requirements for participation.
- Experiencing segregation or separate treatment in any part of a program.
- Being subject to distinctions in quality, quantity or manner in which a benefit is provided.
- Experiencing discrimination in any activities conducted in an MVTA facility built in whole or part with Federal funds.

These rights are guaranteed to you under Title VI of the Civil Rights Act of 1964, which says in part:

- No person in the United State shall, on the grounds 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. (42 U.S.C. Sec200d)

In addition, Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, 1994 provides:

- Each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations.

If you believe that you have been discriminated against in relationship to Minnesota Valley Transit Authority because of your race, color, national origin, sex, age, disability or socioeconomic status, you may file a digital complaint at mvta.com/customer-service/commitment-to-fairness/ or a written complaint with MVTA at this address:

- CEO, Minnesota Valley Transit Authority, 100 E. Highway 13, Burnsville, MN 55337.

If information is needed in another language, please contact MVTA Customer Service at 952-882-7500 or email mvta@mvta.com.

Si necesita información en otro idioma, comuníquese con Servicio al cliente de MVTA al 952-882-7500 o envíe un correo electrónico a mvta@mvta.com.

Nếu cần thông tin bằng ngôn ngữ khác, hãy liên hệ với Dịch vụ khách hàng của MVTA theo số 952-882-7500 hoặc gửi email mvta@mvta.com.

Haddii macluumaadka looga baahan yahay luqad kale, ka dib kala xiriir Adeegga Macmiilka MVTA 952-882-7500 ama iimayl u dir mvta@mvta.com.

Exhibit B - Acknowledgement of Receipt of Title VI Plan

All employees of the Minnesota Valley Transit Authority are expected to consider, respect, and observe this Plan in their daily work and duties. If a citizen approaches you with a question or a complaint, direct him or her to the CEO who is the Title VI Manager.

I hereby acknowledge the receipt of the Minnesota Valley Transit Authority Title VI Plan. I have read the plan and am committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.A.

_____

Your signature

_____

Print your name

_____

Date

_____

EXHIBIT C - TITLE VI COMPLAINT FORM

PART I – COMPLAINANT INFORMATION (Print all items legibly.)

Name		Telephone
Mailing Address		
City	State	Zip Code

PART II – ALLEGED DISCRIMINATING OFFICIAL(S) INFORMATION (Print all items legibly.)

Name		Telephone
Mailing Address		
City	State	Zip Code

PART III – CAUSE OF DISCRIMINATION BASED ON (Check appropriate box [es].)

☐ Race ☐ Color ☐ Sex ☐ Age ☐ National Origin ☐ Disability/Handicap

☐ Sexual or Other Harassment ☐ Income Status

PART IV – THE PARTICULARS ARE (Include names, dates, places, and incidents involved in the complaint.)
(If additional space is needed, attach extra sheet[s].)

PART V – REMEDY SOUGHT (State the specific remedy sought to resolve the issue[s].)

PART VI – COMPLAINT FILED WITH OTHER AGENCIES
Have you filed this compliant with any other federal, state, or local agency; or with any federal or state court?

☐ Yes ☐ No

If yes, check each box that applies:

_____ Federal Agency _____Federal Court _____State Agency

_____ State Court _____Local Agency

If you filed this compliant elsewhere as well, please provide information about a contact person at the agency/court where the complaint was filed.

Name:
_____

Address:_____

City:_____ State:_____ Zip Code:_____

PART VII – VERIFICATION

Complainant's Signature_____ Date_____

Exhibit D - Log of MVTA Title VI Complaints

MVTA uses a Customer Service Database to track all rider comments and there are 20 records since the 2022 Triennial Review that reference equity concerns. MVTA followed up with each customer contact and resolved each contact.

As of December 2025, no formal Title VI Complaints have been filed with MVTA on the basis of color, race, or national origin.

	Date	Summary	Status	Action Taken
Investigations				
	6/27/2023	Customer said she felt discriminated against because she had to find quarter for fare when others were allowed to ride when all they had was large bills.	Closed	Incident was reviewed with Operations Department and customer was informed of action taken.
	6/12/2023	Customer thought the operator was rude when he asked to verify fare payment being used was atypical.	Closed	Customer was informed the operator was unfamiliar with fare payment and asking for confirmation.
	7/27/2023	Customer said operator was being racist when he asked to see fare payment. Customer said they paid before getting on bus.	Closed	Incident was reviewed by video. Customer said they paid before getting on bus but no fare payment was shown. Operator explained they need to provide fare payment when they get on bus.
	7/31/2023	Customer says bus drove by her at stop on Yankee Doodle Road at 8 a.m. July 31. Incident reviewed by video and no passengers are observed at stop on date in question.	Closed	Customer informed of findings.
	10/14/2023	Title VI Complaint Form filled out by Dakota Woodlands representative seeking Go To card option for payment on MVTA Connect.	Closed	Customer informed that MVTA staff members were working with Dakota County on a payment assistance solution that would apply to Dakota Woodlands. Solution was enacted and broadly communicated to all riders.
	9/12/2023	Customer upset about operator making comments generalizing race.	Closed	Incident reviewed by video. Operator was corrected to keep conversations professional and to use good customer service.
	9/12/2023	Customer upset when he tried to get out side door at the same time another customer was exiting front door and contended that the actions were racially motivated.	Closed	Incident reviewed by video. Operator lets person out the front door and then opens back door when customers asks to get out. Customer called with findings.

	10/17/2023	Customer maintains operator is not collecting fare equitably.	Closed	Incident reviewed by video. Operations determined no racial profiling was involved but operator had to be corrected that fare enforcement needed to be more consistent. Customer advised of findings.
	11/29/2023	Customer claimed operator made concerning remarks that were racist and sexually inappropriate.	Closed	Incident was reviewed via video. The passenger stood up and walked to the front and asked why he was not let off. The operator asked why the passenger did not ring the bell and was let off at the next stop. No racists or sexist comments were noted on video. Customer did not respond to three follow-up calls.
	11/27/2023	Customer said he got on bus with Connect transfer ticket that he used and he said all the questions from the operator made him feel like he was being racially profiled.	Closed	Customer was advised that there may have been additional questions due to it being a Connect transfer ticket and to let us know if he has any future experiences that make him feel uncomfortable.
	6/6/2023	Passenger with a bike with fat tires with difficulty getting it to stay in bike rack. Operator pulls bus around to make sure it is fitting in properly. Customer claims operator mouthed “mexican” in the rear view mirror. After speaking with Customer Service about the incident, customer sent threatening and profane email to Customer Service saying “I will do justice myself …” Customer was trespassed from service.	Closed	After speaking with Customer Service about the incident, customer sent threatening and profane email to Customer Service saying “I will do justice myself …” Customer was trespassed from service.
	8/15/2024	Rider claims she was asking for a courtesy ride and was told that the ride is not free. She was allowed to get on bus and was upset that another customer did not have to pay full fare.	Closed	Operator was corrected on customer service and to inform only about the fare.
	10/28/2024	Rider upset that he missed connection because too freeloaders are getting on the bus.	Closed	Customer Service asked what trip he was on and customer didn’t respond with information.
	11/20/2024	Customer was upset that the operator asked to see his mobile ticket twice. The customer asked for the	Closed	The incident was reviewed via video and the operator received disciplinary action

		driver's badge number because he thought he was being targeted and the driver got out of seat.		for getting out of his seat to confront a passenger.
	12/10/2024	Customer upset that he had to show proof of payment. On trip operator got out of bus while customers were onboard.	Closed	Incident reviewed via video. Disciplinary action was taken against operator for leaving people on but and customer was informed that no further incidents would be expected with this operator.
	12/25/2024	Customer upset that he had to wait for someone to get off the bus and that other riders were allowed to get on bus without showing fare.	Closed	Incident reviewed by video. Other customers were boarding with digital fare payment. Customer notified.
	6/5/2025	Customer claiming driver was rude and discriminatory.	Closed	Reviewed incident via video. When customer boarded, she said the bus was cold can you turn the air down. That was all the communication during the trip.
	9/23/2025	Customer said it was disrespectful how the operator asked for fare payment.	Closed	Incident reviewed by video. Customer wasn't familiar with how to pay fare and operator informed them the fair is $2 and "the first thing you said was to get a free ride and not obey the law." Operator was corrected on proper fare communication and to demonstrate better customer service skills. Customer notified of findings.
	9/29/2025	Customer maintains the operator was discriminatory because a ramp wasn't put down.	Closed	Incident was reviewed by video. No evidence that the operator was using racist language. Rider won't be paired with driver in future. Rider was notified to ask for ramp or lift to be used in the future. Findings shared with customer.
	11/6/2025	Rider boards bus and provides confusing information about how she will pay her fare. The operator told her to sit down and both the passenger and customer started to argue. Operator says swear word that customer heard.	Closed	Incident reviewed by video. Customer informed that operator was being disciplined.

Lawsuits				

Complaints				

Updated: March 2026

Exhibit E - Operator Survey on Limited English Proficiency Ridership

As part of MVTA's ongoing commitment to Title VI compliance and equitable service, we are conducting a survey of transit operators to better understand how we can more effectively serve riders with limited English proficiency (LEP). Operators are often the first point of contact for these riders, and your firsthand experience is critical. Please take a few minutes to answer the questions below; your responses will help MVTA identify gaps, improve communication, and better meet the needs of our diverse communities.

**This survey is anonymous, does not collect any rider identity or immigration information, and is used solely to improve tools and support for operators serving riders with limited English proficiency. If you have questions, please feel free to contact our team at (952) 882-7500 or mvta@mvta.com*

1. In the past 30 days, have you had contact with bus riders who appeared to have limited English proficiency (LEP)?
    a. Yes
    b. No

2. On average, how often do you encounter LEP riders while operating an MVTA bus?
    a. Less than once per week
    b. 1-2 times per week
    c. 3-5 times per week
    d. Daily or almost daily

3. When interacting with LEP riders what types of assistance do you most commonly provide? (check all that apply)
    a. Fare payment assistance
    b. Route or schedule information
    c. Stop location or destination guidance
    d. Transfer information
    e. Use of gestures or visual aids
    f. Other (please specify)

4. If known, what non-English languages have you encountered among LEP riders in the past 30 days? (check all that apply)
    a. Spanish
    b. Hmong
    c. Somali
    d. Russian
    e. Arabic
    f. French
    g. Vietnamese
    h. Chinese
    i. Other (please specify)
5. Do you feel you have adequate tools or resources to assist LEP riders effectively?
    a. Yes
    b. Somewhat

    c. No
6. Please share any suggestions or observations that could help MVTA improve service or communication for LEP riders
    a. Open-ended

Exhibit F - Log to Record Inquiries for Requests for Interpreters and Requests for Translated Minnesota Valley Transit Authority 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 G - Log of MVTA Board Action

Date	Subject	Action
3/23/2011	New Business: Adopt Title VI Plan	Approved (8-0)
12/7/2011	Consent Agenda: Title VI Plan Update	Approved (7-0)
1/30/2013	New Business: Title VI Update	Information Only
3/27/2013	Old Business: Adopt Updated Title VI Plan	Approved (7-0)
6/26/2013	Consent: Approve Title VI Service Equity Analysis – Red Line & Local Service Restructuring	Approved (7-0)
12/11/2013	Old Business: Adopt Updated Title VI Plan	Approved (6-0)
2/26/2014	New Business: Title VI Monitoring Report	Approved
1/28/2015	Staff Update: Title VI	Information Only
12/16/2015	Consent: Title VI Equity Analysis for S2S 494 Service	Approved
1/27/2016	Consent: Title VI Equity Analysis Northern Scott County Transit Study	Approved
8/31/2016	Consent: Title VI Service Equity Analysis for 495 Service	Approved
10/26/2016	Consent: 2016 Service Monitoring Report	Approved
10/26/2016	Consent: 2016 Title VI Plan	Approved
10/24/2018	Consent: Winter 2018 Service Equity Analysis	Approved
03/08/2019	Weekly E-Update on Title VI Process	Informational Only
01/29/2020	New Business: 2019 Title VI Plan	Approved
04/29/2020	Consent: 2019 Title VI Plan	Approved
04/29/2020	Consent: 2019 Service Monitoring Report	Approved
04/26/2023	Consent: Pandemic Service Equity Analysis	Approved
04/26/2023	Consent: 2023 Title VI Plan	Approved
04/26/2023	Consent: 2023 Service Monitoring Report	Approved
06/30/2025	New Business: Title VI Analysis for 420 and 436 changes	Approved
2/19/2026	New Business: Title VI Analysis for changes to routes 4FUN, 495, 497, and 499	Approved
4/29/2026	New Business: 2026 Title VI Plan	
4/29/2026	New Business: 2026 Service Monitoring Report	

Updated: April 2026

Exhibit H - MVTA Demographic Profile and Maps

MVTA regularly monitors the demographic composition of both the service area and the rider population. This allows MVTA to readily monitor service for equity and direct service to populations that are more likely to be transit users.

Demographic Group	Service Area Population	MVTA Rider Population
Minority (Non-White)	30.3%	32.2%
Non-English Speaker	16.5% (Speak a Language other than English)	7.8% (Do not prefer English)
Under 18 or 65+	39.1%	6.7%
Non-male Gender Identity	50.7%	50.7%
Median HH Income	$83,953 (Burnsville) to $130,278 (Prior Lake)	$70,000 - $99,999
Accessibility Needs	9.8%	12.1%

**Sources: 2019-2023 ACS 5-Year Estimates, 2024 MVTA Customer Survey*

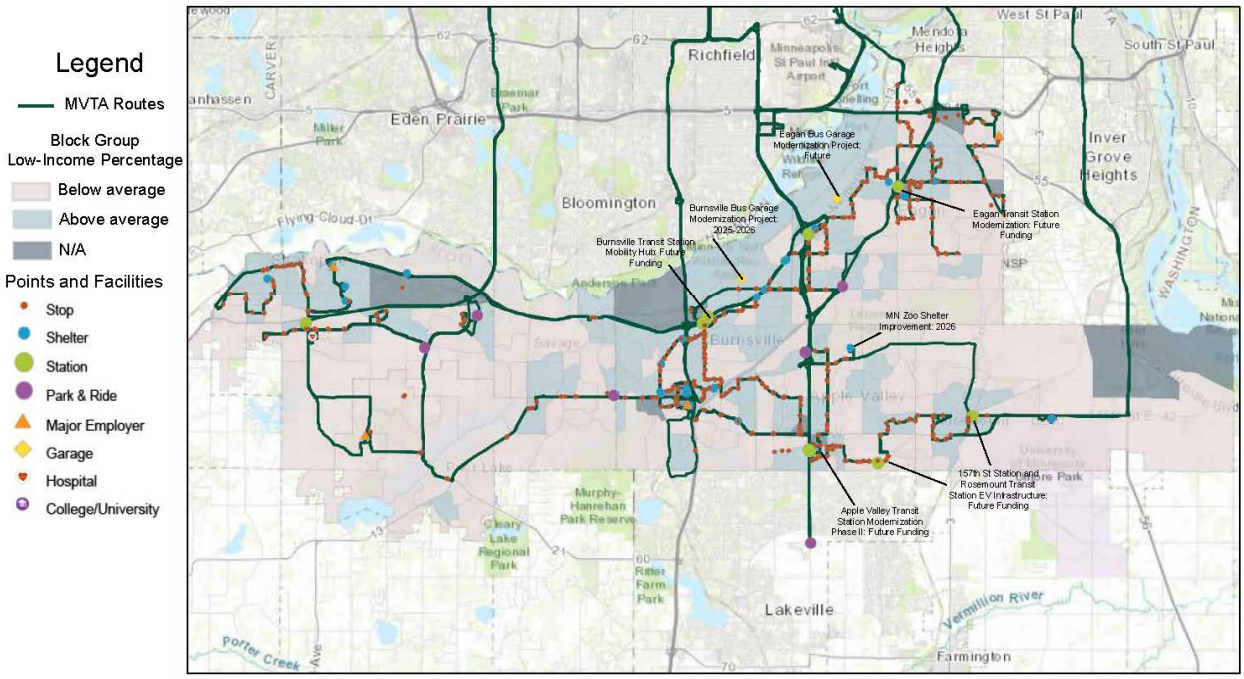
MVTA is also required to describe differences in travel patterns between minority and non-minority riders within Title VI Plan updates. Overall, minority riders are less likely to be riding to Downtown Minneapolis and less likely to ride for work purposes. Minority riders are also more likely to have a longer trip length, more likely to have a transfer in their trip, and more likely to walk to their starting location.

Travel Pattern	Minority Riders	Non-Minority Riders
Top Destinations	Downtown Minneapolis (97) Burnsville (67) Eagan (63)	Downtown Minneapolis (189) Burnsville (89) Apple Valley (88)
Trip Purpose	Work (54.3%) School (20.9%)	Work (61.5%)
Average Trip Length	30 – 45 Minutes (37.4%)	15 – 30 Minutes (40.6%)
Number of Transfers	Zero (41.9%)	Zero (70.9%)
Time of Day	Weekday Rush Hour (68.2%)	Weekday Rush Hour (70.9%)
Preferred Fare Payment	Go-To Card (40.1%) Cash – 9.1%	Go-To Card (40.8%) Cash – 7.5%
Mode of Travel to Starting Location	Walk (51.5%)	Drive (61.5%)

**Source: 2024 MVTA Customer Survey*

The images below show MVTA routes and facility locations as of March 2026 compared to areas with higher concentrations of minority and low-income populations. These images also show the locations of recent and planned improvements to facilities anticipated in upcoming years.

MVTA Routes and Facilities with Block Group Low-Income Percentage Overlay



MVTA Routes and Facilities with Block Group Minority Percentage Overlay

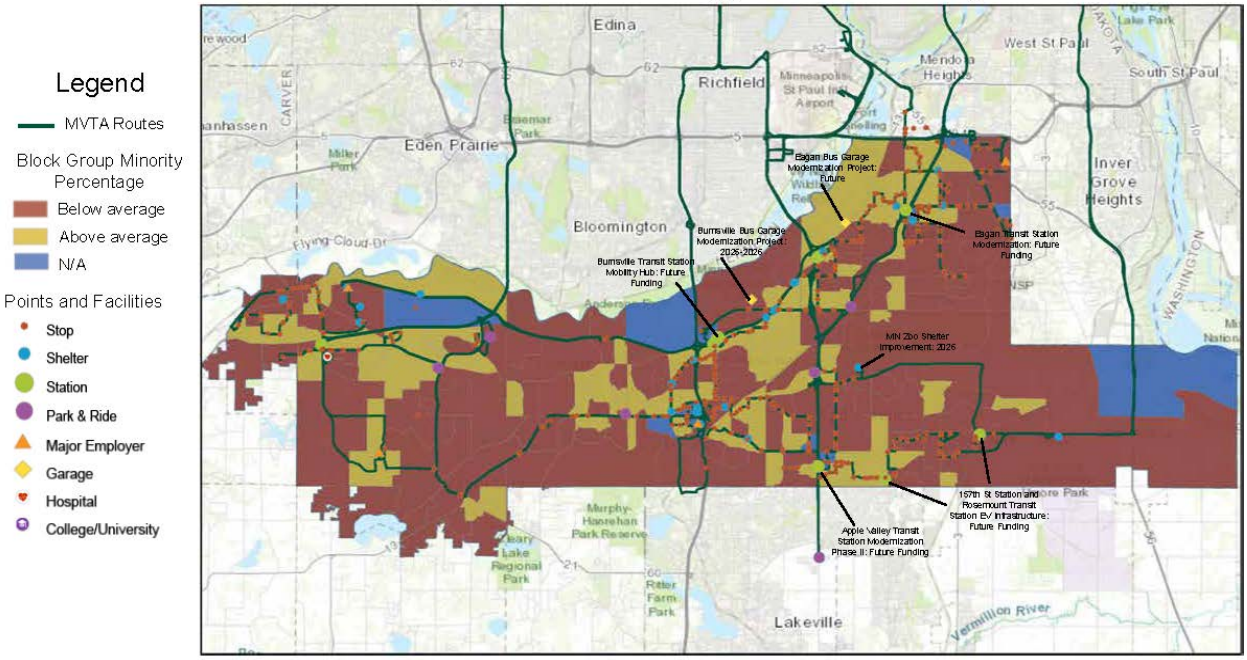


Exhibit I - Non-Elected Groups and Committees Convened by MVTA

South Metro Transit Coalition:

The South Metro Transit Coalition is a non-elected, advisory body initiated and facilitated by MVTA. Membership is selected by MVTA through an open recruitment process and is composed of representatives from businesses, employers, and community organizations within MVTA's service area. The Coalition provides input and feedback on transit services, employer engagement, and regional mobility but does not exercise decision-making authority. This Coalition encourages dialogue and information sharing to encourage effective transit options for workforce in the south metro region.

Membership – Coalition membership includes employers representing a broad range of industries within the South Metro area. Participating businesses employ individuals across diverse racial and ethnic backgrounds and include workforces with varied shift schedules, including nontraditional and off-peak hours.

Encouragement of Minority Participation – As minority populations may be disproportionately reliant on transit, MVTA works intentionally with a broad and diverse group of employers across multiple industries, including those whose workforce includes significant minority populations and employees working varied shifts. Recruitment efforts are distributed widely through employer networks, community partnerships, and public communications to encourage participation reflective of the diversity of the service area.

Transit Champion Program:

The Transit Champion Program is a non-elected, cohort-based advisory and outreach program administered by MVTA. Participants are selected through an open application process managed by MVTA staff. Transit Champions serve as community ambassadors, providing feedback and assisting with outreach efforts but do not hold decision-making authority.

Membership – The Transit Champion Program consists of individual riders and community members selected for a defined cohort period. Demographic information, including race and ethnicity, is collected voluntarily through the application process. Cohort composition varies by program year, but MVTA strives to achieve a balanced group of individuals representative of geography, demographics, and type of service use in the region.

Encouragement of Minority Participation – MVTA actively and explicitly encourages participation from minority and multilingual populations in the Transit Champion Program. Recruitment materials are broadly distributed and designed to be accessible, and outreach includes engagement through community networks serving diverse racial, ethnic, and language communities. The program emphasizes lived experience, community connection, and interest in transit rather than professional credentials, helping to reduce barriers to participation and promote representation reflective of the communities served.

Exhibit J - Results and Board Meeting Minutes of Equity Analyses for Major Service Changes

Spring 2026 Service Change

Two Title VI analyses for a major service change occurred for the March 2026 service change, and the Title VI report was reviewed and approved by the MVTA Board during the February 2026 Board Meeting. The changes found no disparate impact on minority populations, but did find a disproportionate burden on low-income populations. This disproportionate burden was addressed through additional microtransit service, low existing ridership in concentrated low-income areas, and improved transit training.

RESOLUTION NO. 26 - 003

APPROVAL OF TITLE VI REPORT FOR SPRING SERVICE CHANGE

WHEREAS, MVTA plans service changes on March 16, 2026, as part of its regular service change schedule.

WHEREAS, MVTA staff proposed and plans to implement two service changes that meet MVTA's major service change threshold under MVTA's Title VI Plan: 497/499 and 4FUN/495.

WHEREAS, MVTA staff identified a disproportionate burden on low-income communities that will be mitigated by providing additional MVTA Connect service and training.

NOW, THEREFORE, BE IT RESOLVED that the Board of Commissioners of Minnesota Valley Transit Authority hereby approve the Title VI Report for the Spring Service Change.

ADOPTED BY the Minnesota Valley Transit Authority on February 19, 2026.

Chair

Attest:

Name

Fall 2025 Service Change

Two Title VI analyses for a major service change occurred for the September 2025 service change, and the Title VI report was reviewed and approved by the MVTA Board during the August 2025 Board Meeting. The changes found no disparate impact on minority populations and no disproportionate burden on low-income populations.

RESOLUTION NO. 25 - 013

ACCEPTANCE OF TITLE VI ANALYSIS OF FALL 2025 SERVICE CHANGES

WHEREAS, per Title VI of the Civil Rights Act of 1964, MVTA analyzes all proposed major service changes to ensure that vulnerable populations are not singled out for any adverse effects and

WHEREAS, MVTA has analyzed the two major service changes for September 2 and found no major adverse impacts as a result of the changes;

NOW, THEREFORE, BE IT RESOLVED that the MVTA Board accepts the Title VI Analysis of Fall 2025 service changes.

ADOPTED BY the Minnesota Valley Transit Authority on July 30, 2025.

Dan Kealey (Aug 7, 2025 08:46:24 CDT)
Chair

Attest:

Name

Exhibit K - History of MVTA Title VI Plan Revisions

Updates to 12/7/2011 Plan:

- Addition of Table of Contents
- Section V – Title VI Complaint Procedures were significantly revised and expanded
- Addition of Exhibit D: Title VI Complaint Form

Updates to 3/27/2013 Plan:

- Addition of Section VIII - Policy Development Section
- Addition of Appendices 2 & 3 – Major Service Change & Disparate Impact/Disproportionate Burden Policies
- Addition of Exhibit A – List of Title VI Notice Locations
- Addition of Exhibit D – Log of Title VI Complaints
- Addition of Exhibit G – Log of MVTA Board Action
- Addition of Exhibit H – Moved History of Title VI Revisions from Table of Contents page
- Addition of Exhibit I – Annual Quick Facts Report
- Revised order of Exhibits to incorporate additions

Updates to 12/11/2013 Plan:

- Addition of Section IX: Systemwide Standards
- Update to Appendix 1: LEP Plan demographics
- Exhibit A: List of Locations with Title VI Notice
- 2013 Quick Facts Report finalized

Updates to 12/2016 Plan:

- General administrative updates to reflect current practices, demographics, and staffing
- Updated Section VII: Community Outreach
- Updated Section IX: Systemwide Standards
- Updated Appendix 1: Four Factor Analysis
- Updated Exhibit A: List of Locations with Title VI Notice
- Exhibit E: LEP Driver Survey
- Updated Exhibit G: Log of MVTA Board Action
- Updated Exhibit I: Quick Facts Report

Updates to 2019 Plan:

- General administrative updates to reflect current practices, demographics, and staffing
- Updated Appendix 1: Four Factor Analysis
- Updated Exhibit G: Log of MVTA Board Action
- Updated Exhibit I: Quick Facts Report

Updates to 2023 Plan:

- General administrative updates to reflect current practices, demographics, and staffing
- Updated Section V – Title VI Complaint Procedures
- Updated Section VII: Public Participation Plan
- Updated Section VII: Policy Development
- Updated Section IX: Systemwide Standards
- Updated Appendix 1: Four Factor Analysis
- Updated Exhibit A: List of Locations with Title VI Notice
- Updated Exhibit A: Title VI Notice
- Updated Exhibit D: Log of MVTA Title VI Complaints
- Updated Exhibit G: Log of MVTA Board Action

Updates to 2026 Plan:

- Updated Table of Contents
- Updated Section VII: Public Participation Plan
- Updated Section IX: Systemwide Standards
- Updated Appendix 1: Language Assistance Plan
- Updated Exhibit A: List of Locations with Title VI Notice
- Updated Exhibit D: Log of MVTA Title VI Complaints
- Updated Exhibit E: Language Assistance Plan Surveys
- Updated Exhibit G: Log of MVTA Board Action
- Exhibit H Added: MVTA Demographic Profile
- Exhibit I Added: Non-Elected Groups and Committees Convened by MVTA
- Exhibit J Added: Results and Board Meeting Minutes of Equity Analyses for Major Service Changes