



## **Language Assistance Plan**



**Ensuring Meaningful Access for Limited English Proficient Individuals**

**Effective: 11/23/2022**

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## Purpose

The purpose of this Language Assistance Plan (hereinafter "LAP") is to meet Federal Transit Administration's (FTA's) requirements to comply with Title VI of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color, or national origin.

*"No person shall, on 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 assistance." - Civil Rights Act of 1964*

As a subrecipient of FTA funds, VINE Faith in Action transit system resolves to take reasonable steps to provide meaningful access to its public transit services for persons who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English. The FTA refers to these persons as Limited English Proficient (LEP) persons. For LEP individuals, meaningful access denotes access that is not significantly restricted, delayed, or inferior as compared to programs or activities provided to English proficient individuals.

The completion of this LAP for persons with Limited English Proficiency conforms to the requirements of the FTA Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients.

The U.S. DOT's FTA Office of Civil Rights' publication "Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons – A Handbook for Public Transportation Providers," dated April 13, 2007, was used in the preparation of this plan.

The LAP provides guidance to VINE Faith in Action staff who may interact directly with LEP individuals or whose work involves providing information or services to the public. The plan provides protocols for identifying LEP individuals, language assistance measures, and staff responsibilities and training related to ensuring meaningful access for LEP individuals.

The DOT LEP Guidance recommends that all recipients, especially those that serve large LEP populations, should develop an implementation plan to address the needs of the LEP populations they serve. The DOT LEP Guidance provides that to provide for effective implementation plans would typically include the following five elements:

1. Identifying LEP individuals who need language assistance (Four Factor Analysis)
2. Providing language assistance measures
3. Training staff
4. Providing notice to LEP individuals
5. Monitoring, evaluating, and updating the plan

For further questions regarding this plan, please contact:

Transportation Manager  
VINE Faith in Action  
507-387-1666  
rond@vinevolunteers.org

## Definitions

**Disproportionate Burden:** Refers to a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations. A finding of disproportionate burden requires the recipient to evaluate alternatives and mitigate burdens where practicable.

**Four Factor Analysis:** The assessment provided by federal regulation to help the Transit system determine the level of language assistance required for a program or activity.

**Interpretation:** The act of listening to a communication in one language (source language) and orally converting it to another language (target language) while retaining the same meaning.

**Language Assistance Guide:** Provides an itemized list of non-English languages and can be used as a tool to help an LEP individual identify their preferred language to the Transit system staff.

**Language Assistance:** Oral and written language services needed to help LEP individuals communicate effectively with staff and ensure meaningful access to, and equal opportunity to fully participate in, the programs and activities provided by the Transit system.

**Limited English Proficient (LEP):** Individuals whose primary language is not English and who have a limited ability to read, speak, write, or understand English. Individuals may be proficient in English for certain types of communication (e.g., speaking or understanding), but still be LEP for other purposes (e.g., reading or writing).

**Meaningful Access:** Language assistance that results in accurate, timely, and effective communication at no cost to the LEP individual. For LEP individuals, meaningful access denotes access that is not significantly restricted, delayed, or inferior as compared to programs or activities provided to English proficient individuals.

**Public Engagement:** Any process that (1) involves the public in identifying and solving challenges and problems and uses public input to make sustainable decisions, (2) educates or informs the public about a topic or issue, or (3) seeks to build meaningful connections and trust with the public through communication and interaction.

**Timely:** Language assistance provided at a time and place that avoids the effective denial of the service, benefit, or right at issue or the imposition of undue burden on or delay in important rights, benefits, or services to LEP individuals.

**Translation:** The replacement of a word, phrase, or text in one language (source language) with an equivalent-meaning word, phrase, or text in another language (target language).

**Vital Documents:** Paper or electronic written material containing information that is (1)

critical for accessing programs, services, benefits, or activities, (2) directly and substantially related to public safety, or (3) required by law.

## Identification of LEP Individuals – the Four-Factor Analysis

Title VI and its regulations require subrecipients to take reasonable steps to ensure meaningful access to the transportation system’s information and services. What constitutes reasonable steps to ensure meaningful access is contingent on a four-factor analysis established by the U.S. Department of Justice.<sup>1</sup> The four-factor analysis is an individualized assessment that should be applied to all transportation system programs and activities to determine what reasonable steps must be taken to ensure meaningful access for LEP individuals.

VINE Faith in Action has completed the four-factor analysis attached as **Appendix A**. The Analysis is intended to assist in ensuring compliance with federal limited English proficiency guidance and Title VI of the Civil Rights Act of 1964. This analysis does not cover every situation, and compliance determinations are made on a case-by-case basis.

### Safe Harbor for Written Translations

U.S. DOT LEP Guidance provides a “safe harbor” to help ensure greater clarity regarding whether a subrecipient is meeting its obligation to provide written translations. These provisions only apply to the translation of written documents and do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language assistance services are needed and reasonable.

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<sup>1</sup> Enforcement of Title VI of the Civil Rights Act of 1964 - National Origin Discrimination Against Persons with Limited English Proficiency, effective August 11, 2000. Available here: <https://www.justice.gov/sites/default/files/crt/legacy/2010/12/14/eolep.pdf>

## A. Language Assistance Measures

Various language assistance services or protocols are necessary to ensure meaningful access to LEP individuals. VINE Faith in Action has identified available language assistance services and operational measures where language assistance measures are needed based on the first two factors in the four-factor analysis.

Based on our analysis, VINE Faith in Action has determined the importance of language assistance to our program(s), activity(ies), or service(s) as:

- A.  Low level (little to no LEP population)
- B.  Mid-Level (some LEP population)
- C.  High Level (significant LEP population)

VINE Faith in Action has looked at differing considerations in communicating with LEP populations about transit services and information. One consideration is to provide a guide to

identify the foreign language spoken by non-English speakers, such as the “Language Identification” card as identified in **Appendix C**)

VINE Faith in Action has the responsibility to document all interpretation and translation services provided proactively or upon request. A written log documenting all language assistance services provided must be maintained. A template for the Language Service / Public Participation Log is attached as **Appendix E**.

VINE Faith in Action provides language assistance services that would fulfill requests for interpretation and translation services in a timely manner. The following outlines how each of these services would be provided for:

**Translation (written):** *Translation is the replacement of a word, phrase, or text in one language (source language) with an equivalent meaning word, phrase, or text in another language (target language).* VINE Faith in Action, through its Diversity Program employ’s multilingual staff who can help with written translation. VINE Faith in Action also works closely with the Blue Earth County Employment Services which is located in the same building, as well as the Department of Human Services in Blue Earth, Nicollet and LeSueur counties.

**Interpretation (oral):** *Interpretation is the act of listening to a communication in one Language (source language) and orally converting it to another language (target language) while retaining the same meaning.* VINE Faith in Action, through its Diversity Program employ’s multilingual staff who can help with oral translation as needed. VINE Faith in Action also works closely with the Blue Earth County Employment Services which is located in the same building, as well as the Department of Human Services in Blue Earth, Nicollet and LeSueur counties.

#### Public Engagement/Participation

VINE Faith in Action has incorporated Title VI and LEP considerations into an established public participation plan. The Public Participation Plan which outlines the steps our agency follows is attached as

**Appendix D.** The attached plan provides a clear process for engaging and involving the public, including minority and LEP populations. Consideration of LEP communities is documented by first using the results of the four-factor analysis that determines the level and type of language assistance necessary for a particular public engagement plan or activity.

The plan aims to seek out and consider the viewpoints of minority, low-income, and LEP populations in the course of conducting public outreach and involvement activities. VINE Faith in Action’s public participation strategy offers adequate notice of public participation activities, as well as early and continuous opportunities for public review and comments at key decision points to identify social, economic, and environmental impacts of proposed transportation decisions. The plan describes the proactive strategies, procedures, and projected outcomes that align with the public participation activities throughout the year(s). Every effort is made to involve minority and LEP populations in effective participation in our decision-making process. The following practices include, but are not limited to:

- Scheduling meeting at times and locations that are convenient and accessible for minority and LEP communities
- Employing different meeting sizes and formats
- Coordinating with community- and faith-based organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities
- Considering radio, television, newspaper, social media ads on stations, outlets, and in publications that serve LEP populations. Outreach to LEP populations could also include audio programming available on podcasts.
- Providing opportunities for public participation through means other than written communication, such as personal interviews or use of audio or video recording devices to capture oral comments.
- Preparing for public engagement activities by determining ways to provide language assistance when no interpreter is present or whether needed or not, providing written documents in other languages, if requested, including ethnic media, schools, and religious or community organizations to assist in providing information.

All language assistance services provided during public engagement or community outreach will be recorded on the Language Service / Public Participation Log is attached as **Appendix E**.

## **B. Staff Training**

To ensure transit staff, and/or appropriate overall agency staff, understand the obligations to provide meaningful access to information and services for LEP individuals, all employees in public contact positions will be properly trained. This plan outlines the training provided on an annual, on-going and/or on-demand basis to implement the following:

- Staff have been trained and understand meaningful LEP policies and procedures
- New staff will have appropriate training as part of the orientation for new employees
- Staff who have contact with the public is trained to work effectively with in-person and telephone interpreters
- Management staff, even if they do not interact regularly with LEP individuals, will be fully aware of and understand the plan to reinforce the importance of the program and ensure it is implemented accordingly by/to staff

VINE Faith in Action has developed standard presentations, resource connections and other language assistance trainings that provide for cost-effective and flexible opportunities for staff and management to understand the LAP Plan, the Public Participation Plan and responsibilities. Existing employees, especially managers and those who work with the public will be offered re-training or new training sessions to keep up to date on their responsibilities to LEP individuals. The following outlines the information incorporated within the training provided annually, on-going or on-demand:

- Standard presentation provided to new, existing and management on the staff responsibility to LEP populations. Template is used at multiple agency trainings and is updated on a regular and as-needed basis

- Consistent information will be included on transit agency's responsibilities to LEP populations
- Summary of Language Assistance Plan
- Demographic data about local LEP population
- Frequency of contacts between LEP populations and the transit system's services, programs, and activities
- The importance of community outreach and inclusion of activities for LEP populations
- Description of the type of language assistance currently providing and instructions on how staff can access these products and services
- Description of VINE Faith in Action and/or overall agency's cultural sensitivity policies and practices
- Printed LEP resources: understanding the information, how to use information and method in presenting information to LEP populations
- Resources and methods in response to verbal requests for transit service in a foreign language
- Responsibility to notify transit manager about any LEP persons' unmet needs
- New employees are invited to attend VINE Faith in Action volunteer orientation which includes diversity training

#### Staff Training Program and Training Log

An outline of the training program, which includes the training title, type of resource (video, presentation, written documents, etc.) and training log (identifies training and training schedule (annually, orientation, on-going, and/or on-demand)) is attached as Staff Training Program and Training Log in **Appendix F**.

- "Breaking Down the Language Barrier: Translating Limited English Proficiency into Practice." This video, which is available as a streaming video link on [www.lep.gov](http://www.lep.gov), explains the language access requirements of Title VI and Executive Order 13166 through vignettes that expose the problems resulting from the absence of language assistance. The video goes on to show how these same situations could have been handled more appropriately if the service provider took reasonable steps to provide meaningful access
- "How to Engage Low-Literacy and Limited English Proficient Populations in Transportation Decision making," available at [https://www.fhwa.dot.gov/planning/publications/low\\_limited/index.cfm](https://www.fhwa.dot.gov/planning/publications/low_limited/index.cfm) This report documents "best practices" in identifying and engaging low-literacy and LEP populations in transportation decision making. These "best practices" were collected during telephone interviews with individuals in 30 States.
- "Guidelines for Developing Traffic Safety Educational Materials for Spanish-Speaking Audiences," a manual developed by the Education in Traffic Safety project, Education Development Center, Inc., with funding from the National Highway Traffic Safety Administration. The manual is organized into three sections: research and planning, creating materials, and dissemination and evaluation. Available at [http://www.casaferoutestoschool.org/wp-content/uploads/2011/05/TSEM\\_Guidelines.pdf](http://www.casaferoutestoschool.org/wp-content/uploads/2011/05/TSEM_Guidelines.pdf)
- Community Partner presentations at VINE Faith in Action



## C. Notice to LEP individuals

Based on the four-factor analysis, VINE Faith in Action has determined that language services will be provided for the LEP populations identified as having a need. For those languages that meet the translation need for written documents threshold based on Safe Harbor guidance, notices will be in the language the LEP individual would understand. For languages that do not meet the written document requirement, based on the Safe Harbor guidance, VINE Faith in Action will provide meaningful access to LEP individuals through competent oral interpreters where oral language assistance services are needed and reasonable. All notifications will provide that identified services are available free of charge to LEP individuals.

Examples of notification considered include:

- Transit intake areas, transfer stations, transit shelters, transit stops, or similar areas  
It is important that LEP individuals can identify how to access language services available to them at initial points of contact
- Signs on buses
- Brochures or Pamphlets
- Posters
- Targeted Community Outreach events or meetings
- Information provided to local organizations that work with LEP individuals
- Telephone messages
- Local ads (print, radio, TV, social media, billboards)
- Website notices
- Information tables/booths at local events, community businesses, schools, and churches
- Employee Outreach and Recruitment
- Other: Describe:

All facility(ies) where VINE Faith in Action interacts with the public in-person will have a Public Notice of Rights Under Title VI posted clearly and conspicuously, including non-English versions of the notice, if deemed necessary after conducting a four-factor analysis. Notices in English and Spanish are attached as **Appendix G**. Staff will use, when necessary, a language guide tool or a process similar to interact with LEP individuals. All interactions with LEP individuals will be recorded on the Language Service / Public Participation Log as **Appendix E**.

This Language Assistance Plan and the Notice are available on our website at [www.truestransit.org](http://www.truestransit.org)

## D. Monitoring, Evaluating and Updating Plan

VINE Faith in Action has developed a process for determining whether new documents, programs, services, and activities need to be made accessible for LEP individuals and will provide notice of any changes in services to the LEP public and to staff. The process includes an annual review to consider changes in demographics, types of services, or other needs that may require an annual reevaluation. VINE Faith in Action will also seek feedback from LEP

populations and community outreach programs with follow-up meetings, focus groups and/or with surveys.

The Language Assistance Plan considers the following five elements:

1. Identifying LEP individuals who need language assistance (Four Factor Analysis)
2. Providing language assistance measures
3. Training staff
4. Providing notice to LEP individuals
5. Monitoring, evaluating, and updating the plan

In addition to the five elements, the plan sets clear goals, management accountability, and opportunities for staff and community input and planning throughout the process.

Areas of consideration when monitoring, evaluating and updating include:

- Current LEP populations in the service area or population affected or encountered.
- Frequency of encounters with LEP language groups.
- Nature and importance of activities to LEP persons.
- Availability of resources, including technological advances and sources of additional resources, and the costs imposed.
- Whether existing assistance is meeting the needs of LEP persons.
- Whether staff knows and understands the LEP plan and how to implement it.
- Whether identified sources for assistance are still available and viable.
- Whether staff training is sufficient.
- Review any complaints from LEP individuals received during the past year.

The VINE Faith in Action is committed to ensuring that no person is excluded from participation in, denied the benefits of, or otherwise subjected to discrimination on the basis of race, color, or national origin by VINE Faith in Action providing programs and services in the following counties of Blue Earth, Nicollet, and LeSueur. Person who alleges that a violation to the Title VI requirements has been made may file a Title VI complaint by completing and submitting the Title VI Complaint Form to VINE Faith in Action and/or to MnDOT Office of Transit and Active Transportation Attn: Compliance Coordinator. VINE Faith in Action and/or MnDOT, will investigate complaints received no more than 180 days after the alleged incident. All complaints that are complete will be processed and responded to based on the Title VI Complaint Procedures attached as **Appendix H**.

VINE Faith in Action has created and made available a Title VI Complaint Form for use by customers who wish to file a Title VI complaint. The complaint form is available on VINE Faith in Action's website at <https://truetransit.org/passenger-info/>. The Title VI Complaint Form specifies the three classes protected by Title VI—race, color, and national origin—and allows the complainant to select one or more of those protected classes as the basis/bases for discrimination. The Title VI Complaint Form is a vital document. If a Limited English Proficient (LEP) populations in the VINE Faith in Action area meets the Safe Harbor threshold, then the procedure is provided in English and in any other language(s) spoken by LEP populations that meet the Safe Harbor Threshold. Attached as **Appendix I** is the Title VI Complaint Form.

## **E. Contact Information**

Based on the feedback received from agency staff, community members, LEP populations, and other key stakeholders; incremental changes may be needed for the type of written and oral language assistance provided, along with any staff training and community outreach efforts.

This Language Assistance Plan will be reviewed by our transit system every other year, with any revisions being approved by the Board of Directors or Policy Board and dated. The next review will occur in October 2024.

Questions or comments about this plan may be submitted to:

Transportation Manager  
VINE Faith in Action  
507-387-1666  
rond@vinevolunteers.org

*All elements of this Plan are in compliance with FTA Circular 4702.1B Title Vi, FTA "A Handbook for Public Transportation Providers, and Minnesota State DOT - Office of Transit and Active Transportation Title VI Program: FTA*



## Limited English Proficiency Four-Factor Analysis

**Date:** 11 / 23 / 2022

**Completed by/title:** Ron Decker Transportation Manager

**Briefly describe the program or activity subject to analysis:**

Title VI and its regulations require subrecipients to take reasonable steps to ensure meaningful Access to the transportation system's information and services. The four-factor analysis is an Individualized assessment that should be applied to all transportation system programs and activities to determine what reasonable steps must be taken to ensure meaningful access for LEP individuals. This population will be program-specific and includes people who are in the Transit system's geographic area.

VINE Faith in Action considers transit to be an important and essential service for many people living in our service area. Many LEP persons use our transit service to travel to work, medical appointments, and educational opportunities. VINE Faith in Action also provides transportation to Adult Basic Education and English Language Learner Classes.

**Factor #1:** The number or proportion of LEP persons eligible to be served or likely to be encountered through the program or activity?

The greater the number or proportion of LEP individuals from a particular language group served or encountered in the eligible service population, the more likely language assistance services are necessary. Ordinarily, "individuals eligible to be served or likely to be encountered" by a program or activity are those who are in fact, served or encountered in the eligible service population. This population will be program-specific and includes people who are in the Transit system's geographic area.

VINE Faith in Action first examined prior experiences with LEP individuals and determined the number and proportion of LEP persons served or encountered within the service area. Included in our examination, a transit system user survey was completed on 2.09.2022 and included questions to address experiences with LEP individuals and their language

assistance service needs. VINE Faith in Action also included LEP populations that are eligible to be served or likely to be affected or encountered.

To support the efforts of conducting the four-factor analyses, VINE Faith in Action referred to the data compiled from the [MnDOT's LEP Data Tool](#) for our system's jurisdiction of services at the city and county-level attached as **Appendix B**.

#### Primary Languages for Transit System County Programs or Information

The data provided in **Appendix B** identified Spanish, Arabic, and Vietnamese. languages as the top three LEP groups in the jurisdiction providing service.

1. Counties (City) served: Blue Earth, Nicollet and Le Sueur
2. Total county/counties population: 129,970
3. The total number of LEP individuals in our service area is: 2643
4. The total eligible population in our service area is: 129970
5. The proportion (percentage) of LEP population to the total eligible service population is: 7%

#### Reliable External Data Sources for Identifying LEP Groups

VINE Faith in Action used reliable external data sources to determine the number or proportion of individuals eligible to be served or likely to be affected or encountered based on the expected geographic area served (ie. city, county, regional area, etc.) Reliable external data sources included:

- [MnDOT's LEP Data Tool](#): Allows subrecipients to identify LEP language groups by county city, and school district. Webpage includes further details about how to use the tool.
- [American Community Survey](#): An annual survey conducted by the U.S. Census Bureau providing vital demographic information and is widely considered the most reliable source of detailed information about the United States population.
- [Minnesota Compass](#): A Wilder Research project providing Minnesotans with credible, user-friendly data about their communities.
- [EJSCREEN](#): A mapping tool created by the U.S. Environmental Protection Agency based on nationally consistent data and an approach that combines environmental and demographic indicators in maps and reports. The functions include automated demographic reporting for a geographic area around an identified project area.
- [MN State Demographic Center](#): Provides data and reporting on various topics, including language and immigration.

In addition to identifying and examining prior experiences with LEP individuals and the external data sources outlined above, VINE Faith in Action looked at local data resources to determine the number or proportion of LEP individuals who may be eligible to be served. These include:

- Locally Coordinated Human Services/Transit Plan
- Other Human Services data
- Area/Metropolitan Planning Organizations/Regional Development Commission data
- Information from local organizations (religious, legal, social service, etc.) about LEP Persons in our service area
- Reports from drivers, dispatchers, and others about contact with LEP persons

#### Safe Harbor for Written Translations

U.S. DOT LEP Guidance provides a “safe harbor” to help ensure greater clarity regarding whether VINE Faith in Action is meeting its obligation to provide written translations. These provisions only apply to the translation of written documents and do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language assistance services are needed and reasonable.

The following actions by VINE Faith in Action are considered as meeting the compliance with the written-translation obligations:

- (a) Providing written translations of vital documents for each eligible LEP language group that constitutes 5% or 1,000 people, whichever is less, of the population of individuals eligible to be served or likely to be affected or encountered. Translation of non-vital documents, if needed, can be provided orally; or
- (b) If there are fewer than 50 individuals in a language group that reaches the 5% trigger in (a), the vital written materials are not translated, but written notice of the right to receive free, competent oral interpretation of those vital written materials in the primary language of the LEP language group of is provided.

Failure to meet the actions provided does not mean there is noncompliance, but rather provide a resource to obtain greater certainty of compliance with a fact-intensive, four-factor analysis. Generally, it would not be necessary to translate vital documents when it would be so burdensome as to defeat the legitimate objectives of a program. Other ways of providing meaningful access, such as effective oral interpretation of certain vital documents, might be acceptable under such circumstances.

The findings from the graphs within Appendix B indicate the following LEP language group(s) meet(s) the safe harbor threshold: Spanish. VINE Faith in Action will prioritize written document translation of vital information into the identified language(s).

#### **Factor #2: The expected frequency with which LEP individuals will interact with the program, activity, or service?**

VINE Faith in Action conducts an assessment process, as accurately as possible, to obtain updated information on the frequency with which the Transit system would have or should have contact with LEP individuals from different language groups seeking assistance. The assessment is completed on an annual basis, by survey and/or outreach efforts. In determining the needs, emphasis is placed on populations that will have frequent contacts for services, while less frequent or unpredictable service contact needs will require less intensified solutions.

Less intensified solutions could be as simple as being prepared to use telephone interpretation services for immediate interpreter services or the use of staff person who can translate for the parties. At all times, VINE Faith in Action will look for opportunities to increase their outreach efforts to all LEP language groups.

Many LEP persons use our transit service to travel to work, medical appointments, and educational opportunities. VINE Faith in Action also provides transportation to Adult Basic Education and English Language Learner Classes.

LEP persons may interact in several ways other than for public transit trip opportunities, with VINE Faith in Action, including but not limited to:

- Public meetings
- Community events
- Project-specific meetings, events, and discussions
- Online engagement
- Walk-in requests for information
- Phone communications
- Customer service interactions
- Surveys for information

The conclusions drawn from examining this information about LEP persons seeking transit services are: VINE Faith in Action partners with both the Blue Earth County Employment Services and the Adult Basic Education program. With these partnerships, we provide transportation to LEP persons for education purposes daily during the school year and for employment and daycare needs. VINE also has contracts with local county human services to provide transportation for MA eligible LEP passengers. Other destinations frequently identified include the Blue County Government Center, Adult Basic Education Classes, and local medical clinics.

In conducting our most recent review VINE Faith in Action has had interactions with the following LEP language groups in the past three years: Schedulers, Dispatch and Drivers interact with LEP language groups on a daily basis. Spanish and Somali tend to be the most frequent group encountered during the past three years.

The frequency of those interactions has been high. During the school year the interactions are high as we coordinate with the Blue Earth County Employment Services to transport LEP individuals to ESL classes and adult education classes. We also coordinate with VINE Faith in Action's Diversity program to transport LEP individuals to classes at VINE.

**Factor #3: The nature and importance of the program, activity, or service provided by the program to the people's lives?**

The obligations to communicate rights to LEP individuals who need access to services or information is a priority in meaningful transportation. VINE Faith in Action has identified programs or activities that would have serious consequences to individuals if language barriers

would prevent a person from benefiting from the service. All posted materials in the buses reference language assistance availability. Our transit system considers transit to be an important and essential service for many people living in our service area. VINE Faith in Action works with the community organizations, such as Blue Earth County Employment Services, Blue Earth, Nicollet, and Le Sueur Counties Human Services, and Adult Basic Education Services to provide opportunities for access and information to public transit services. In our efforts we regularly provide transportation for LEP persons to travel to work medical appointments, educational opportunities, as well as rides to Adult Basic Education and English language Learner Classes.

VINE Faith in Action provides over 12,000 rides annually with key destinations being medical, employment, education and grocery stores.

Within our analysis, VINE Faith in Action will identify necessary language assistance measures, including the translation of vital documents into an identified LEP population that seeks services or information on a regular basis and is likely to be affected. Vital documents are paper or electronic written material that contains information that is 1) critical in accessing programs, services, benefits, or activities, 2) directly related to public safety, or 3) required by law. Determining whether a document or the information is “vital” may depend on the importance of the information or service involved and the consequences to the LEP individual if the information is neither accurate nor timely.

Examples of vital documents in the U.S. DOT LEP Guidance include:

- Emergency transportation information
- Notices advising LEP individuals of free language assistance
- Instructions on how to participate in a program or activity or receive service

As noted under Factor #1, the following languages meets the safe harbor threshold for translating vital written materials: Spanish.

The following document types have been identified as vital and subject to translation in accordance with this analysis and federal guidance:

- Public Notice of Rights Under Title VI
- Language assistance notice on public engagement invitations
- Language assistance notice on large public-facing documents

Efforts used in the translation of the eligible vital documents, included: VINE Faith in Action Staff

**Factor #4:** The resources available to the public for LEP outreach, as well as the costs associated with providing meaningful language access.

VINE Faith in Action has weighed the demand for language assistance against the agency’s current and projected financial and personnel resources. In our analysis we have determined if the language services, or lack of language services, currently provided is cost effective and to plan for future investments that will provide the most needed assistance to the greatest number of LEP individuals within our service jurisdiction. VINE Faith in Action will determine on a case-by-case basis whether language assistance costs outweigh the benefits.



Our current annual budget for marketing to or communicating with LEP individuals or populations in their language about transit services that are available to them is \$500 per year. This may include funding for staff training, translation services, brochures, flyers, posters, newspaper ads, radio ads, website, etc. The amount and efforts our agency have provided over the years has remained the same and include written records of efforts and resources provided for the past three years. Records indicate that our agency has remained the same in the number of staff and percentage of staff time that is associated with providing language assistance. This number and percentage will remain the same over the next three years.

VINE Faith in Action has taken into consideration that “reasonable steps” may cease to be reasonable when the costs imposed substantially exceeds the benefits, and we have carefully explored the most cost-effective means of delivering competent and accurate language services before limiting services due to the resource concerns. Our efforts to be resourceful have considered the impact in utilizing technology advances, such as telephone and video conferencing interpretation services and translating vital documents posted on our website, reasonable business practices, and sharing of language assistance materials and services among and between other transit agencies, bilingual staff that provide language assistance on an ad hoc or regular basis, and advocacy groups and the affected populations. The range in services may be from using telephone-based interpretation services to provide in-person interpretation at a public event. In all cases, however, VINE Faith in Action will proactively identify how to provide language assistance services efficiently and cost-effectively while ensuring meaningful access to LEP individuals.

Based on our analysis of demographic data and contact with community organizations and LEP individuals, we have determined that we have consistently addressed the needs of the EP populations and our efforts in determining information that needs to be translated into additional languages or additional oral or written language service are being met, and that additional language assistance needs are being addressed or more widespread.

VINE Faith in Action, through its Diversity Program employ’s multilingual staff who can help with oral translation as needed. VINE Faith in Action also works closely with the Blue Earth County Employment Services which is located in the same building, as well as the Department of Human Services in Blue Earth, Nicollet and LeSueur counties.

## **Findings: What language assistance measures will you need to employ to ensure meaningful access to LEP individuals:**

Based on the analysis above, how important will language assistance be to this program or activity?

- Not Important (little to no LEP population)
- Important (some LEP population)
- Very Important (significant LEP population)

What non-English languages are most prevalent in your service area? What are the numbers and percentages for each, based on total populations?

Spanish 3.56%

Based on the findings of most prevalent non-English languages, will you need to translate documents for any or all of the identified populations? Spanish

If so, what documents would need to be translated? Title 6 notice including where to find language assistance and the complaint form and instructions.

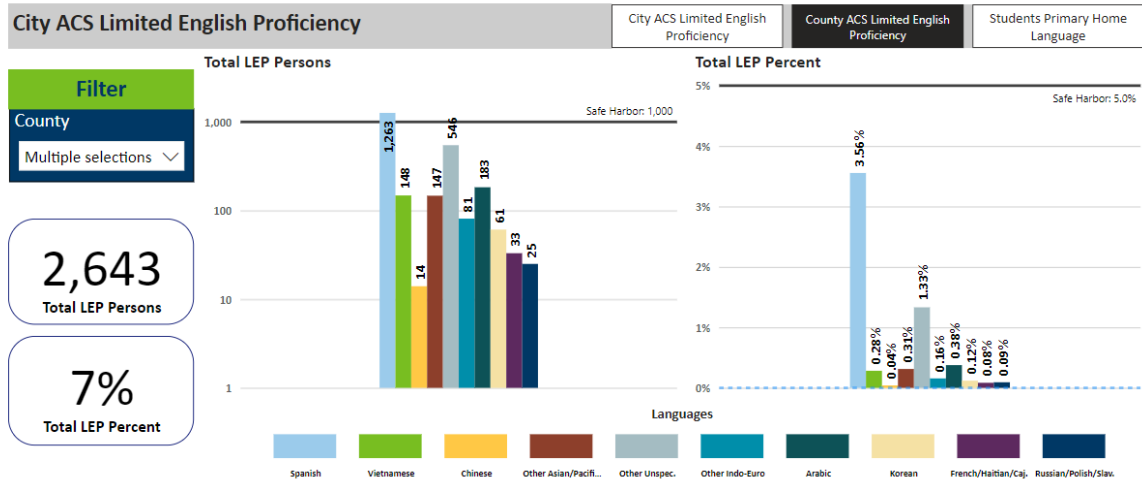
Will you need to provide interpreters for any public outreach or similar event(s)? Only in rare occasions would translators be needed.

## Appendix B

# Limited English Proficiency (LEP) Data

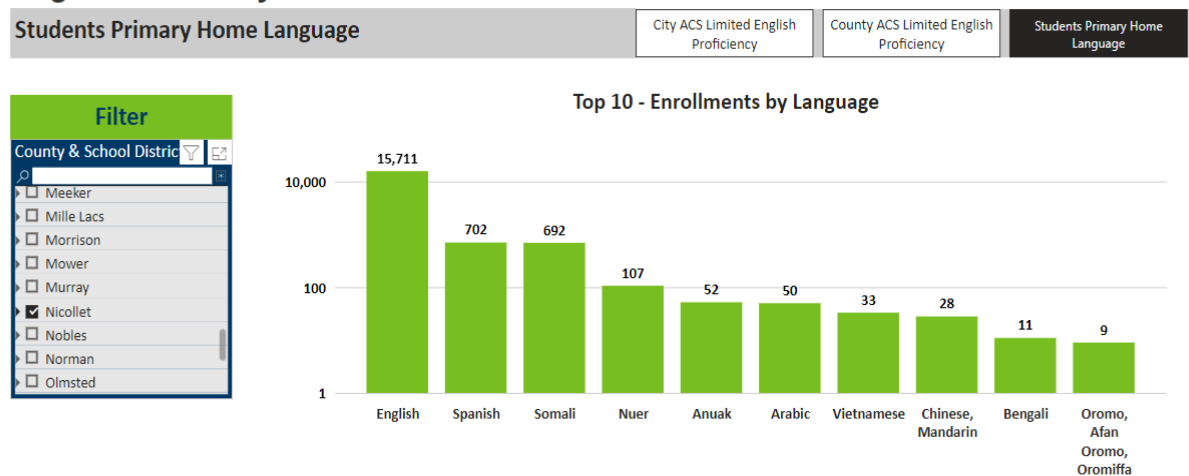
American Community Survey (5-Year Estimate 2015-2019, Table ID C16001)

### Limited English Proficiency Data Tool



## Minnesota Department of Education: Primary Home Language for Students

### Limited English Proficiency Data Tool



# Minnesota Compass

Blue Earth County

## Race & Ethnicity (2016-2020)

White	58,852	±56	87.4%	0.1%
Of Color	6,872	±215	10.2%	0.3%
Black or African American alone	2,794	±263	4.1%	0.4%
American Indian and Alaskan Native alone	139	±47	0.2%	0.1%
Asian or Pacific Islander alone	1,516	±133	2.3%	0.2%
Other alone	suppressed			
Two or more races alone	1,460	±319	2.2%	0.5%
Hispanic or Latino (of any race)	2,579	±0	3.8%	0.0%



[Minnesota Compass](#)

Nicollet County

## Race & Ethnicity (2016-2020)

White	30,080	±89	88.0%	0.3%
Of Color	3,147	±182	9.2%	0.5%
Black or African American alone	836	±195	2.4%	0.6%
American Indian and Alaskan Native alone	suppressed			
Asian or Pacific Islander alone	507	±74	1.5%	0.2%
Other alone	suppressed			
Two or more races alone	1,138	±228	3.3%	0.7%
Hispanic or Latino (of any race)	1,595	±0	4.7%	0.0%

[Minnesota  
Compass](#)

LeSueur County

<b>Race &amp; Ethnicity (2016-2020)</b>				
White	25,815	±34	90.8%	0.1%
Of Color	1,317	±228	4.6%	0.8%
Black or African American alone	198	±51	0.7%	0.2%
American Indian and Alaskan Native alone	80	±45	0.3%	0.2%
Asian or Pacific Islander alone	91	±35	0.3%	0.1%
Other alone	suppressed			
Two or more races alone	415	±82	1.5%	0.3%
Hispanic or Latino (of any race)	1,796	±0	6.3%	0.0%

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