



Language Assistance Plan



Ensuring Meaningful Access for Limited English Proficient Individuals

Effective:
January 1, 2023

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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 sub recipient of FTA funds, Rolling Hills 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 Rolling Hills Transit 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:

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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 a 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 sub recipients 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.¹ 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.

Rolling Hills Transit 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 sub recipient 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.

¹ 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

- B. Various language assistance services or protocols are necessary to ensure meaningful access to LEP individuals. Rolling Hills Transit 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.
- C. Based on our analysis, Rolling Hills Transit 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)

Rolling Hills Transit has looked at differing considerations in communicating with LEP populations about transit services and information. Considerations are:

- Translation of key documents in the Spanish language
- Language identification card
- Arranging for availability of oral translators
- Communication with LEP persons' groups about transit services
- Posting notices in appropriate languages informing LEP persons of available services
Rolling Hills Transit has translated informational brochures into Spanish.
- The transit system already has interpreters available via the Language Line.
- Rolling Hills Transit will continue to use their website, which can be translated into 52 languages, to promote transportation services.
- Transportation staff will also identify key locations to post notices in appropriate languages informing LEP persons on the services available.

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**.

Recording Use of Language Assistance Services

Rolling Hills Transit 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**.

Rolling Hills Transit 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). Translation of key documents into Spanish language. No fee will be charged.

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. Arrangement of oral translator. No fee will be charged.

Public Engagement/Participation

Rolling Hills Transit 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. Rolling Hills Transit'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

Rolling Hills Transit 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 Rolling Hills Transit and/or overall agency's cultural sensitivity policies and practices
 - MN RTAP Training Site
- 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

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**.

- a) "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, 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
- b) "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 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.
- c) "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

C. Notice to LEP individuals

Based on the four-factor analysis, Rolling Hills Transit 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, Rolling Hills Transit 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 Rolling Hills Transit 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 rhtbus.com

D. Monitoring, Evaluating and Updating Plan

Rolling Hills Transit 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. Rolling Hills Transit 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.

Rolling Hills Transit 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 Rolling Hills Transit, providing programs and services in the following counties; Dodge, Olmsted, Fillmore, Winona and Houston. Persons who allege 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 Rolling Hills Transit and/or to MnDOT Office of Transit and Active Transportation Attn: Compliance Coordinator. Rolling Hills Transit 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**.

Rolling Hills Transit 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 Rolling Hills Transit's website at rhtbus.com. 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 Rolling Hills Transit 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:

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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: 10/18/22 **Completed by/title:** Melinda Fields, Public Transportation Director

Briefly describe the program or activity subject to analysis:

Title VI and its regulations require sub recipients 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.

Rolling Hills Transit is a public transportation program that operates in five counties in southeastern Minnesota – Dodge, rural Olmsted, Fillmore, rural Winona and Houston counties. Public transportation service includes Demand Response.

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.

Rolling Hills Transit 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 Semcac Community Needs Assessment was completed in September 2021 and included questions to address experiences with LEP individuals and their language assistance service needs. Semcac 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, Rolling Hills Transit 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, Other Asian/Pacific Islander, and Vietnamese, languages as the top three LEP groups in the jurisdiction providing service.

Rolling Hills Transit assessed the following information about LEP persons to determine the number or proportion of LEP persons who might use or want to use our transit services:

Counties (City) served: 18 cities (5 counties w/ limited service areas due to rural locations)

1. Total city/counties population: 76,539
2. The total number of LEP individuals in our service area is: 3,596
3. The total eligible population in our service area is: 76,539
4. The proportion (percentage) of LEP population to the total eligible service population is: 11.7 %

Reliable External Data Sources for Identifying LEP Groups

Rolling Hills Transit 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 sub recipients 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, Rolling Hills Transit looked at local data resources to determine the number or proportion of LEP individuals who may be eligible to be served. These include:

Survey results:

Describe: Survey results from the agency's most recent Community Needs Assessment. This assessment is completed every three years. Semcac is currently in the process of conducting a new survey of the southeastern region and it will be published in 2025.

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

Other information:

Describe: Semcac Transportation provides public transit services in Houston County, Fillmore County, Dodge County, rural Olmsted County and rural Winona County. In coordination with local organizations and through Semcac's other programs in these counties (such as food shelves, Head Start Centers, and Semcac Contact Centers where people come for crisis assistance or information and referrals to other community programs and resources), Semcac is mindful of LEP persons populations growing in all service areas.

Safe Harbor for Written Translations

U.S. DOT LEP Guidance provides a "safe harbor" to help ensure greater clarity regarding whether Rolling Hills Transit 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 Rolling Hills Transit 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. Rolling Hills Transit 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?

Rolling Hills Transit 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, Rolling Hills Transit will look for opportunities to increase their outreach efforts to all LEP language groups.

Rolling Hills Transit drivers and dispatchers have reported very little interaction with or requests for service from LEP persons. The system currently provides rides for people of diverse races, ethnicities and national origins. The employees relay that there have been few language barriers. At this time, Rolling Hills Transit is not aware of LEP persons in our service area that need our transportation services but have been unable to access our system due to their need for language assistance. Rolling Hills Transit (Semcac) has had a Limited English Proficiency Plan in place since 2006 and has procedures in place for LEP persons to access our programs and services.

LEP persons may interact in several ways other than for public transit trip opportunities, with Rolling Hills Transit, 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
- Transit App
- Semcac or Rolling Hills websites at semcac.org & rhtbus.com

The conclusions drawn from examining this information about LEP persons seeking transit services are: Rolling Hills transit has LEP persons who utilize transportation services.

In conducting our most recent Semcac wide Community Assessment in 2021, Rolling Hills Transit has had interactions with the following LEP language groups in the past three years: Spanish, Asian or Pacific Islander.

The frequency of those interactions has been low/moderate, with most interactions surrounding school and/or work trips.

Rolling Hills transit will document over the next three year period, the frequency in which LEP individuals from different language groups come into contact with our program, activities or services.

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. Rolling Hills Transit has identified programs or activities that would have serious consequences to individuals if language barriers would prevent a person from benefiting from the service. These could include emergency evacuations and/or other safety and security risks.

Rolling Hills Transit considers transit to be an important and essential service for many people living in our service area. Rolling Hills Transit bus work with key community organizations to provide opportunities for access and information public transit services. These include childcare, preschool, places of business, medical facilities and senior congregate dining sites. The number of rides for children to get to and from their preschools and their childcare providers has especially increased in recent years. The preschool/childcare rides have included rides for children of diverse races, ethnicities and national origins. These rides are coordinated through the preschools in our service area counties; therefore, the preschools are completing most of the communication with the families that sign-up for this service. Rolling Hills Transit provided 50,831 rides in calendar year 2022

Within our analysis, Rolling Hills Transit 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**

- Title VI Complaint Procedure
- Title VI Complaint Form
- Language assistance notice on public engagement invitations
- Language assistance notice on large public-facing documents
- RHT registration forms
- RHT policies
- RHT Rider's Guide/brochure

Efforts used in the translation of the eligible vital documents, included:

- Project Fine
- Semcac Staff

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

Rolling Hills Transit 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. Rolling Hills transit will determine on a case-by-case basis whether language assistance costs outweigh the benefits.

Our current budget for marketing to or communicating with LEP persons in their language about transit services that are available to them is about \$22,500 (2023; \$25,000, 2024; \$27,000, 2025; \$28,900) each year for the next three years. 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 likely increase over the next three years.

Rolling Hills Transit 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, Rolling Hills Transit 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 LEP 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.

In addition to Rolling Hills Transit's LEP resources, each community has resources located within local school districts, Head Start Programs and/or County Agencies. Our agency (Semcac) also has several bilingual employees, is a member of the Language Line, and any employee can establish a three way call to immediately get an interpreter on the phone. Additionally, Rolling Hills Transit's website includes a feature powered by Google Translate, which allows the website to be instantly translated into 52 languages at the click of a button; this also, has been at no cost to the system.

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, 289-11.7%

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

Yes.

If so, what documents would need to be translated?

Brochures/Rider's Guides, policies, signage, transportation request forms, Title VI documents & LEP Plan.

Will you need to provide interpreters for any public outreach or similar event(s)?

Will be provided upon request.

Limited English Proficiency (LEP) Data

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

- County
- City/Town

Byron City, Minnesota

GET DATA

Byron City, Minnesota

People Who Speak a Language Other Than English at Home

2.7 percent

Source: Latest ACS 5-Year Estimates Data Profiles/Social Characteristics

People Who Speak English Less Than Very Well

0.6 percent

Source: Latest ACS 5-Year Estimates Data Profiles/Social Characteristics

People Who Speak Spanish at Home

0.2 percent

Source: Latest ACS 5-Year Estimates Data Profiles/Social Characteristics

- County
- City/Town

Chatfield City, Minnesota

GET DATA

Chatfield City, Minnesota

People Who Speak a Language Other Than English at Home

3.8 percent

Source: Latest ACS 5-Year Estimates Data Profiles/Social Characteristics

People Who Speak English Less Than Very Well

0.6 percent

Source: Latest ACS 5-Year Estimates Data Profiles/Social Characteristics

People Who Speak Spanish at Home

1.3 percent

Source: Latest ACS 5-Year Estimates Data Profiles/Social Characteristics

- County
- City/Town

Eyota City, Minnesota

GET DATA

Eyota City, Minnesota

People Who Speak a Language Other Than English at Home

1.3 percent

Source: Latest ACS 5-Year Estimates Data Profiles/Social Characteristics

People Who Speak English Less Than Very Well

0.6 percent

Source: Latest ACS 5-Year Estimates Data Profiles/Social Characteristics

People Who Speak Spanish at Home

1.2 percent

Source: Latest ACS 5-Year Estimates Data Profiles/Social Characteristics

- County
- City/Town

Lewiston City, Minnesota

GET DATA

Lewiston City, Minnesota

People Who Speak a Language Other Than English at Home

3.2 percent

Source: Latest ACS 5-Year Estimates Data Profiles/Social Characteristics

People Who Speak English Less Than Very Well

2.6 percent

Source: Latest ACS 5-Year Estimates Data Profiles/Social Characteristics

People Who Speak Spanish at Home

2.6 percent

Source: Latest ACS 5-Year Estimates Data Profiles/Social Characteristics

- County
- City/Town

Stewartville City, Minnesota

GET DATA

Stewartville City, Minnesota

People Who Speak a Language Other Than English at Home

4.8 percent

Source: Latest ACS 5-Year Estimates Data Profiles/Social Characteristics

People Who Speak English Less Than Very Well

0.7 percent

Source: Latest ACS 5-Year Estimates Data Profiles/Social Characteristics

People Who Speak Spanish at Home

3.8 percent

Source: Latest ACS 5-Year Estimates Data Profiles/Social Characteristics

- County
- City/Town

Dodge County, Minnesota

GET DATA

Dodge County, Minnesota

People Who Speak a Language Other Than English at Home

6.0 percent

Source: Latest ACS 5-Year Estimates Data Profiles/Social Characteristics

People Who Speak English Less Than Very Well

1.2 percent

Source: Latest ACS 5-Year Estimates Data Profiles/Social Characteristics

People Who Speak Spanish at Home

4.9 percent

Source: Latest ACS 5-Year Estimates Data Profiles/Social Characteristics

- County
- City/Town

Fillmore County, Minnesota

GET DATA

Fillmore County, Minnesota

People Who Speak a Language Other Than English at Home

5.6 percent

Source: Latest ACS 5-Year Estimates Data Profiles/Social Characteristics

People Who Speak English Less Than Very Well

3.0 percent

Source: Latest ACS 5-Year Estimates Data Profiles/Social Characteristics

People Who Speak Spanish at Home

1.2 percent

Source: Latest ACS 5-Year Estimates Data Profiles/Social Characteristics

- County
- City/Town

Houston County, Minnesota

GET DATA

Houston County, Minnesota

People Who Speak a Language Other Than English at Home

3.1 percent

Source: Latest ACS 5-Year Estimates Data Profiles/Social Characteristics

People Who Speak English Less Than Very Well

0.9 percent

Source: Latest ACS 5-Year Estimates Data Profiles/Social Characteristics

People Who Speak Spanish at Home

1.5 percent

Source: Latest ACS 5-Year Estimates Data Profiles/Social Characteristics

<https://www.census.gov/acs/www/about/why-we-ask-each-question/language/>

Minnesota Department of Education: Primary Home Language for Students

Limited English Proficiency Data Tool

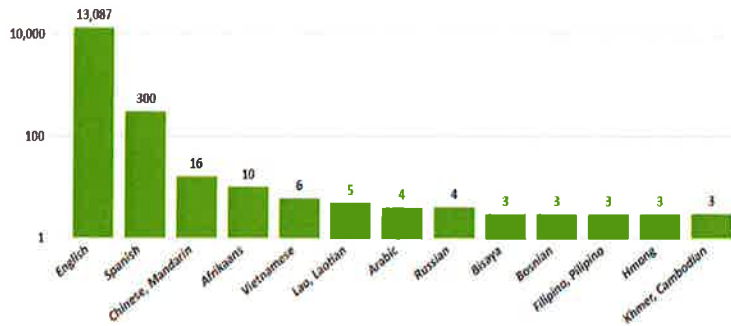
Students Primary Home Language City ACS Limited English Proficiency County ACS Limited English Proficiency Students Primary Home Language

Filter

County
All

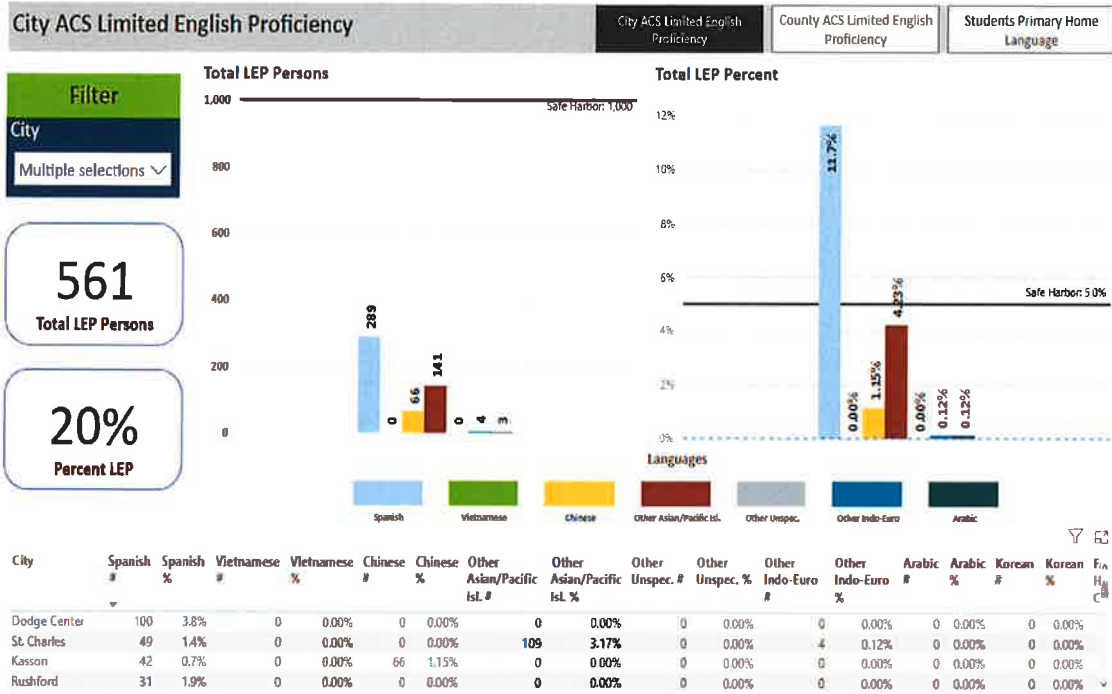
School District
Multiple selections

Top 10 - Enrollments by Language



MnDOT LEP Data Tool Data

Limited English Proficiency Data Tool



<https://www.dot.state.mn.us/civilrights/lep-data-tool.html>

Language Identification

One way to determine the language of communication is to use language identification cards (or "I speak cards"), which invite LEP persons to identify their language needs to staff. Such cards, for instance, might say, "I speak Spanish" in both Spanish and English, or "I speak Vietnamese" in both English and Vietnamese

Language Identification Cards

Side 1 of 2

Instructions: Place a check by the language spoken.

<input type="checkbox"/> Mark this box if you read or speak English.	<i>English</i>
<input type="checkbox"/> ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية.	<i>Arabic</i>
<input type="checkbox"/> Մարդու՞մ ենք նշում կատարե՞ք այս քանակուսում, եթե խոսում կամ կարդում եք հայերեն:	<i>Armenian</i>
<input type="checkbox"/> যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন।	<i>Bengali</i>
<input type="checkbox"/> ឈ្មួញក្នុងប្រអប់នេះ បើអ្នកមាន ឬនិយាយភាសា ខ្មែរ ។	<i>Cambodian</i>
<input type="checkbox"/> Motka i kahhon ya yangin ûntûngnu' manaitai pat ûntûngnu' kumentos Chamorro.	<i>Chamorro</i>
<input type="checkbox"/> 如果你能读中文或讲中文，请选择此框。	<i>Simplified Chinese</i>
<input type="checkbox"/> 如果你能讀中文或講中文，請選擇此框。	<i>Traditional Chinese</i>
<input type="checkbox"/> Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik.	<i>Croatian</i>
<input type="checkbox"/> Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky.	<i>Czech</i>
<input type="checkbox"/> Kruis dit vakje aan als u Nederlands kunt lezen of spreken.	<i>Dutch</i>
<input type="checkbox"/> اگر خواندن و نوشتن فارسی بلد هستید، این مربع را علامت بزنید.	<i>Farsi</i>

Language Service / Public Participation Log

Staff Instructions

Rolling Hills Transit staff should make an effort to track all language services requested or proactively provided throughout the year. Rolling Hills Transit has designated the following staff position to be primarily responsible for ensuring the log is consistently utilized: Dispatchers

Date of Service: This is the date the translation or interpretation service was available to the public. For instance, the date of service for a translated service brochure would be the date of its first distribution to the public. If the same brochure is used multiple times, that can be noted in the Additional Comments column.

Request or Proactive: Select "Proactive" if Rolling Hills Transit proactively determined the language services was necessary. Select "Request" if a member of the public requested the language service be provided.

Translation or Interpretation: Translation refers to converting written materials from one language to another and interpretation refers to converting spoken word from one language to another.

Description of Service Provided: The description should include an associated public engagement reference or product title and brief details explaining the service provided (i.e. what was translated, what event/meeting, particular audience, etc.)

Vital Document: A "vital document" is a paper or electronic written material that contains information that is critical for accessing programs, services, benefits, or activities; directly and substantially related to public safety; or required by law. It is at the designated staff discretion to determine whether a document is deemed a vital document.

Service Provider: The name of the qualified language services provider that completed the request through service provider or in-house.

Type of Service Provider: Note whether you used specified staff person, a collaborative partner, or an outreach consultant to complete the language services request. Use the "other" option was used or for unique situations (i.e. bilingual staff providing assistance) and make a note explaining further in the Additional Comments column.

Rolling Hills Transit

Language Service/Public Participation Log

Date of Service	Request or Proactive	Translation, Interpretation or other	Description of Service Provided	Vital Document	Language	Service Provider	Type of Service Provider	Additional Comments
Ongoing	Proactive	Translation	Language options/drop down	Web page	Spanish, Hmong, Cambodian, Chinese, Mandarin, Oromo	Google Translate	Online	Up to 133 languages are available for translation
Ongoing	Proactive	Translation	English to Spanish Translation	Ride's Guide	Spanish	Project Fine	in person/online/email	Printed and distributed
Ongoing	Proactive	Translation	English to Spanish Translation	Rider's Policy & request form	Spanish	Staff	in person/online/email	Webpage
Ongoing	Proactive	Translation	English to Spanish Translation	Title VI Documentation	Spanish	Staff	in person/online/email	Webpage
Ongoing	Proactive	Translation	English to Spanish Translation	Language assistance Plan	Spanish	Staff	in person/online/email	Webpage
As needed	Proactive/request	Translation	Spanish to English vice versa	call	Spanish	Staff	in person/online/email	During a call, bilingual Dispatcher
As needed	Proactive/request	Interpret/Translate	Spanish to English vice versa	email	Spanish	Google Translate	Online	Email, Google Translate