

**Maple Grove Transit 2014 Title VI Plan**

**I. Introduction / Plan Statement**

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance" (42 U.S.C. Section 2000d).

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

Title VI Manager Contact information:

Michael Opatz  
Transit Administrator  
City of Maple Grove  
P.O. Box 1180  
12800 Arbor Lakes Parkway  
Maple Grove, MN 55311  
Phone: 763-494-6001

**II. Title VI Information Dissemination**

- Title VI information posters called "Commitment to Fairness" shall be prominently and publicly displayed in the Maple Grove Transit facilities, website, hand schedules and on their revenue vehicles. The name of the Title VI Manager is available on the website, at [www.maplegrovetransit.org](http://www.maplegrovetransit.org). (See **Appendix 1**).
- A complete copy of the approved Title VI plan will be posted on the City of Maple Grove's website. The original document will be filed in the Transit Administrator's office and available to public for review upon request. Complete copies will be provided to the public upon request. The document will be translated to other languages upon request.
- All City of Maple Grove employees with material and direct involvement with the Maple Grove Transit program shall be provided a copy of the Title VI Plan and are required to sign the Acknowledgement of Receipt (see **Appendix 2**). During New Employee

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Orientation, new employees with material and direct involvement with the Maple Grove Transit shall be informed of the provisions of Title VI, and the City of Maple Grove's expectations to perform their duties accordingly and be provided a copy of the Title VI Plan and are required to sign the Acknowledgement of Receipt (see **Appendix 2**).

- Title VI information shall be disseminated to the City of Maple Grove employees annually via the Employee bulletin board and city-wide e-mail. This process reminds employees of The City of Maple Grove's policy statement, and of their Title VI responsibilities in their daily work and duties.

### III. Subcontracts and Vendors

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

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

### IV. Record Keeping

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

### V. Title VI Complaint Procedures

The complainant may file a signed, written complaint up to one hundred and eighty (180) days from the date of the alleged discrimination. The complaint should include the following information:

- Contact information including: Name, mailing address, telephone number, cell phone number and email address
- Description of the incident including how, when, where and why you believe you were discriminated against. Names and contact information for all witnesses.
- Other relevant information

The Title VI complaints are to be submitted in writing to Micahel Opatz at the following address:

Michael Opatz

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Transit Administrator  
City of Maple Grove  
P.O. Box 1180  
12800 Arbor Lakes Parkway  
Maple Grove, MN 55311  
Phone: 763-494-6001

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

All complaints alleging discrimination based on race, color or national origin in a service or benefit provided by will be directly addressed by the City of Maple Grove and shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. Additionally, The City of Maple Grove shall make every effort to address all complaints in an expeditious and thorough manner.

A letter of acknowledging receipt of complaint will be mailed within seven days. Please note that in responding to any requests for additional information, a complainant's failure to provide the requested information may result in the administrative closure of the complaint.

All complaints will be thoroughly investigated. The investigation will be conducted in a full, fair and impartial manner by the Title VI Manager. Results of the investigation will be presented to the Maple Grove City Council for a determination. Every effort will be made to respond to Title VI complaints within 60 working days of receipt of such complaints. Complaints will be determined to be substantiated, not substantiated or inconclusive. Following the investigation, the City of Maple Grove will send a final written response letter to the complainant identifying the final determination. In the letter notifying complainant that the complaint is not substantiated the complainant will be advised of his or her right to:

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

As part of the appeal process, the City will notify the complainant in writing that they have the right to:

- be represented by an attorney or other representative of his/her own choosing.
- to bring witnesses and present testimony and evidence as part of the appeal process.

The City will maintain Title VI Complaint log to summarize and track all complaints. See **Appendix 3** for a copy of the log.

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

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

### VI. Limited English Proficiency (LEP) Plan

The City of Maple Grove has developed this Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to Maple Grove Transit services including Fixed Route and Dial-a-Ride transportation services as required by Executive Order 13166. A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

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

- 1) number or proportion of LEP persons eligible in the City of Maple Grove service area who maybe served or likely to encounter a City of Maple Grove program, activity, or service;
- 2) frequency with which LEP individuals come in contact with the City of Maple Grove services;
- 3) nature and importance of the program, activity or service provided by the City of Maple Grove to the LEP population; and
- 4) resources available to the City of Maple Grove and overall cost to provide LEP assistance. A brief description of these considerations is provided in the following section.

See **Appendix 4** for a copy of the LEP Plan.

### VII. Community Outreach

The City of Maple Grove has undertaken the following community outreach efforts to engage the public in planning and decision-making processes, as well as its marketing and outreach activities:

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- Utilizes an eight-member Transit Commission “advisory committee” to provide user input into the operation and planning of the system. The group is made up of daily riders who are Maple Grove residents.
- **Appendix 5** includes a table depicting the racial breakdown of the membership of the Maple Grove Transit Commission. It also includes a sample application and process used to recruit members when vacancies occur on the Commission.
- Has established a website at [www.maplegrovetransit.org](http://www.maplegrovetransit.org) to post information, policies, maps, schedules, news, rider alerts, meeting notices. This website clearly states contact information for Maple Grove and list the “Commitment to Fairness” policy.
- Has a system called “eSubscribe” to send out broadcast e-mails to bus riders and other interested individuals about information, policies, maps, schedules, news, rider alerts, meeting notices.
- Rider Alert flyers are directly distributed to bus riders on bus by the drivers and posted at the five park-and-ride lots.
- Bus Schedules and map are distributed in public places like the Maple Grove Transit Station, Cub Foods (grocery store), Maple Grove Community Center, Maple Grove Governments Center and Maple Grove Library. This brochure clearly states contact information for Maple Grove and list the “Commitment to Fairness” policy.
- About every five years, a comprehensive user survey is undertaken and other subject specific surveys are used as needed.
- Maple Grove City Council meeting notices and agenda are posted per the State of Minnesota open meeting statutes. Transit business items for the City Council meeting are included in the agenda. Agendas are available online and meetings are broadcasted on cable TV and streamed to the City website.

The public will be invited to participate in the planning and decision process whether through public meetings or surveys whenever major service changes are contemplated. The public is invited to attend all City Council and Transit Commission meetings.

Citizens and passengers may call or e-mail the City of Maple Grove to lodge a complaint or comment. All complaints/comments are distributed to a designated the City of Maple Grove employee to research the complaint and responds to the complainant. Complaints are archived.

### **VIII. . System Wide Standards and Policies**

Title VI requires providers with 50 vehicles or less to adopt system wide standards and policies.

### Service Standards

- Vehicle Loads: Trip ridership on Maple Grove Transit express trips are reviewed monthly to look for patterns of standing loads. When an individual trip experiences ten or more standees at least three times a week for three straight weeks, the trip is examined for possible solutions to reduce the number of standees in the context of available financial and vehicle resources.
- Vehicle Headways: For peak period express routes serving downtown Minneapolis, Maple Grove Transit has a goal of at least 45-minute headways with a minimum of four trips per route.
- On-Time Performance: The goal is that 90 percent of the trips are on time for all regular route service. Due to the nature of express bus service an “on-time trip” is defined as a trip that is not more than one minute early and not more than five minutes late. However, note for those timepoints classified as “drop-off” timepoints in the schedule buses can be early due to the nature of the express bus service. An analysis will be done annually using AVL data from the month of October to determine compliance with this policy.
- Service Availability: Maple Grove Transit is primarily a commuter express service and as result the service has evolved with the philosophy that there is one main express route (781) located in the general center of the city that will have the most trips and the largest station/park-and-ride facility. That main route is also supplemented with five satellite express routes with fewer trips and smaller park-and-ride facilities. If you divide the City into four equal quadrants there are at least one express and park-and-ride route be located in each quadrant with no city residence further than four miles from a park-and-ride lot. Due to the weight and noise of commuter express buses, it is a goal that 90 percent of the route miles of the local portion of the route are operated within the City on streets that are not classified as “local” streets per the street classification system included in the City of Maple Grove’s Transportation Plan. Collector and arterial streets are the preferred streets to locate and operate the local portion of express bus routes.

### Service Policies

Maple Grove Transit is primarily a commuter express service and as result the service has evolved with the philosophy that there is one main express route (781) located in the general center of the city that will have the most trips and the largest station/park-and-ride facility. That main route is also supplemented with five satellite express routes with fewer trips and smaller park-and-ride facilities. The local portion of Maple Grove Transit express routes operate as a “flag” service meaning we stop any where that is safe to stop along the route if a customer flags down the driver. As a result, shelters and stations are not placed along the route with the exception of park-and-ride lots. The goal of each express route is to place the park-and-ride at or near the end of the local portion of the route. Buses are assigned to trips based on historical ridership figures and current trends to best match vehicles sizes to ridership demand. Due to the weight and noise of commuter express buses, it is a goal that 90 percent of the route miles of the

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local portion of the route are operated within the City on streets that are not classified as “local” streets per the street classification system included in the City of Maple Grove’s Transportation Plan. Collector and arterial streets are the preferred streets to locate and operate the local portion of express bus routes. This Title VI plan adopts the following “Service Policies”:

- Distribution of Transit Amenities: The local portion of Maple Grove Transit express routes operate as a “flag” service meaning we stop any where that is safe to stop along the route if a customer flags down the driver. As a result, shelters and stations are not placed along the route with the exception at park-and-ride lot. The goal of each express route is to place the park-and-ride lot at or near the end of the local portion of the route. All park-and-ride lots shall have at least 35 parking stalls. A shelter is defined as a rider waiting facility that is not fully heated and cooled and does not include restrooms. All park-and-ride lots will have a rider shelter that is at least 5 feet by 12 feet. A station is defined as a more substantial rider waiting facility with a full HVAC system, restrooms, and security cameras. A route must have at least eight inbound express trips to be considered for a station. All stations will dependent on available funding. All stations and shelters will include bus service information, lighting, and trash cans.
- Vehicle Assignment by Mode – Maple Grove Transit express service has three types of vehicles: articulated low floor, coach, and 40-foot low flow. Each buses style has a different passenger capacity. Buses are assigned to specific trips based on the ridership levels to help prevent standing loads. The assignments are analyzed each service pick change (4 times a year). The five Dial-A-Ride buses are typically identical models that are only two to three years differences in age over a five-year life span. For peak period times, there is no spare, so all buses are assigned equally to the service.

Additional Service Policies are incorporated within the Maple Grove Transit Policy Manual, which was adopted to set policies that provide a general framework how the City of Maple Grove will govern its transit operations.

More specifically, the adoption of the Policy Manual is directed toward ensuring compliance with all applicable federal regulations as condition to receiving federal funds for vehicles and facilities. The Policy Manual provides the mechanism to satisfactorily demonstrate that its contracted bus service providers are also in compliance with applicable federal regulations and that the City is adequately monitoring that compliance. The Policy Manual sets the procedures to satisfactorily demonstrate that the City of Maple Grove is providing adequate monitoring, oversight and control over its federally funded facilities and vehicles.

The end result of implementing the Policy Manual is an environment to help ensure that Maple Grove Transit services and facilities are operated in safe, reliable, and cost-effective manner and made available to the general public regardless of race, color, national origin or disability.

The Policy Manual includes the following chapters:

- Chapter 1 - Americans With Disabilities Act (ADA)
- Chapter 2 - Drug and Alcohol

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- Chapter 3 - Title VI of Civil Rights
- Chapter 4 - Maintenance
- Chapter 5 - Lobbying
- Chapter 6 - Suspension and Debarment
- Chapter 7 - Buy American
- Chapter 8 - Procurement
- Chapter 9 - Safety and Security
- Chapter 10 - Satisfactory Continuing Control
- Chapter 11 - Grant Management
- Chapter 12 - Charter Service

### **IX. Plan Updates.**

This plan will be updated every three years and the 2014 Plan was approved by the Maple Grove City Council on January 6, 2014.

- This version last edited on 12/19/13.

**Appendix 1**

**City of Maple Grove  
Commitment to Fairness**

The City of Maple Grove pledges that you will have access to all our programs, services and benefits without regard race, color, creed, religion, age, national origin, sex, sexual orientation, marital status, public assistance status, disability, handicap or political affiliation. . The City of Maple Grove will not tolerate discrimination by its employees or entities it contracts with for products and services. The City of Maple Grove prohibits all discriminatory practices that may result in an individual:

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

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

- No person in the United State shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. (42 U.S.C. Sec200d)

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

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

If you believe that you have been discriminated against in relationship to the City of Maple Grove because of your race, color, national origin, sex, age, disability or socioeconomic status, you may file a written complaint with the City of Maple Grove at this address:

- Transit Administrator, City of Maple Grove, **P.O. Box 1180**, 12800 Arbor Lakes Parkway, Maple Grove, MN 55311

**Appendix 2**

**Acknowledgement of Receipt of Title VI Plan**

All City of Maple Grove employees with material and direct involvement with the Maple Grove Transit program are expected to consider, respect, and observe this Plan in their daily work and duties. If a citizen approaches you with a question or a complaint, direct him or her to the City Administrator who is the Title VI Manager.

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

\_\_\_\_\_  
Your signature

\_\_\_\_\_  
Print your name

\_\_\_\_\_  
Date

**Appendix 3**

**Title VI Complaint Log**

<u>Case #</u>	<u>Complainant</u>	<u>Address</u>	<u>Date Filed</u>	<u>Status</u>	<u>Disposition</u>

**Appendix 4**



**Limited English Proficiency Plan**

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

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

The City of Maple Grove has developed this Limited English Proficiency Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency [LEP] who wish to access services provided by the transit authority. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English.

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

In order to prepare this plan, The City of Maple Grove undertook the U.S. DOT four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter a City of Maple Grove program, activity or service.
2. The frequency with which LEP persons come in contact with the City of Maple Grove programs, activities or services.
3. The nature and importance of programs, activities or services provided by the City of Maple Grove to the LEP population.

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4. The resources available to the City of Maple Grove and overall cost to provide LEP assistance.

**1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter a City of Maple Grove program, activity or service.**

The City of Maple Grove staff reviewed the 2007-2011 U.S. Census American Community Survey Report and determined that 60,241 persons live in the City of Maple Grove. A total of 6,581 or 11.7% of the persons indicated they speak a language other than English at home, see chart below. There are a total of 3 non-English languages spoken in the City of Maple Grove that constitute at least one percent of the population.

**Age 5+ by Language Spoken at Home  
Based on 2007-2011 American Community Survey 5-year Estimate of 56,117**

Classification	Population Totals	Percentage of Total
Only English	49,536	88.3%
Asian/Pacific Islander	1,733	3.1%
IndoEuropean	2,574	4.6%
Spanish	1,606	2.9%
Other	673	1.2%

*Source: B16001. LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER – Universe: POPULATION 5 YEARS AND OVER Data Set: 2007-2011 American Community Survey 5-Year Estimates Survey: American Community Survey)*

**Age 5+ by Language Spoken at Home  
Based on 2013 Estimate of 60,013**

Classification	Population Totals	Percentage of Total
Only English	53,194	88.64%
Asian/Pacific Islander	1,773	2.95%
IndoEuropean	2,686	4.48%
Spanish	1,696	2.83%
Other	664	1.11%

*Source: City of Maple Grove Demographics, Estimated for Year 2013, produced by Nielsen Claritas.*

In further examination of current demographic data, City staff found that in the City of Maple Grove, 470 persons or 0.84% of the population figures of 56,117 have limited English proficiency; that is, they speak English less than “very well”. See details below.

56,117	Total Population
49,536	Speak only English
1,601	Speak Spanish:
1,165	Speak English "very well"
436	Speak English less than "very well"
40	Speak other Indo-European languages:
40	Speak English "very well"
0	Speak English less than "very well"

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188	Speak Asian and Pacific Island languages:
169	Speak English "very well"
19	Speak English less than "very well"
15	Speak other languages:
0	Speak English "very well"
15	Speak English less than "very well"

*(Source: B16001. LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER – Universe: POPULATION 5 YEARS AND OVER Data Set: 2007-2011 American Community Survey 5-Year Estimates Survey: American Community Survey)*

A 2011 Maple Grove Transit rider survey asked the following Question:

What is the primary language spoken in your household?

- English
- Spanish
- Chinese
- Japanese
- Other (specify) \_\_\_\_\_

English was reported by 95% of riders to be the primary language spoken at home. All “other” responses appear verbatim below:

- English/Swedish
- Turkish
- Tamil
- Tamil
- German
- French

**2. The frequency with which LEP persons come in contact with the City of Maple Grove programs, activities or services.**

The City of Maple Grove assessed the frequency with which staff and drivers have or could have contact with LEP persons. This includes documenting phone inquiries and surveying vehicle operators. To date, the City of Maple Grove has had zero requests for interpreters and zero requests for translated Maple Grove Transit documents. **Exhibit A** is the driver and staff survey. **Exhibit B** is the log to record inquiries for requests for interpreters and requests for translated Maple Grove Transit documents.

In October 2013, Maple Grove Transit surveyed the ten drivers and three Customer Service Representatives (CSR) from the dial-a-ride program. Six of the ten drivers recalled in the past 30 days coming in contact with an LEP customer. The seven drivers stated that they had between one to three LEP contacts on a weekly basis with a 1.83 average. Only one driver of the seven drivers stated that they provided assistance to an LEP customer, and that drivers stated it

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happens between one to three times a week. All three of the CSRs surveyed stated that they do not recall in the past 30 days coming in contact with an LEP customer.

The dial-a-ride driver surveys failed to identify one or two languages as being the dominant language among those LEP customers who were provided assistance. . The driver listed the following survey responses as to the non-English languages spoken: Various African and Eastern Europe, Spanish, El Salvador, Russian, Africa, Liberia, Somali,

The express route drivers were also surveyed in October 2013 with 65 of the 71 drivers completing the survey. Six drivers were either on medical leave or just transferred out of the garage. Only 7 of the surveyed drivers stated that they had a LEP contact within the past 30 days. With those seven drivers the frequency of contact ranged from one to five times a week with an average of 2.4 times per week. Only three of the seven driver stated that they provided assistance to an LEP person, which ranged from one to five times per week with an average of 1.4 times per week. Only three of the seven drivers thought they knew the language that the LEP person spoke. The drivers listed: Hmong, Swahili, and Spanish.

In October 2012, Maple Grove Transit surveyed the six City staff persons in the Administration Department that have contact with the general public regarding transit matters via the phone, walk-ins, or e-mail. All six staffers reported that they had zero LEP contacts in the past 30 days.

The above section documents the frequency of contact with LEP versus providing assistance to LEP. Maple Grove Transit feels it's an important distinction in assisting in the development of LEP program. For example, drivers may have general contact with an LEP, but are finding that the LEP person is not requiring special assistance to successful use the system. If the survey shows that a certain area is requiring a greater level of LEP assistance, we can focus our LEP efforts more effectively and efficiently to target situations.

### **3. The nature and importance of programs, activities or services provided by the City of Maple Grove to the LEP population.**

There is no large geographic concentration of any type LEP individuals in the City of Maple Grove service area. The overwhelming majority of the population, in the City of Maple Grove speak only English. As a result, there are few social services, professional and leadership organizations within the City of Maple Grove service area that focus on outreach to LEP individuals. The City of Maple Grove provides two transportation services that serve the general public, which include the commuter express and the demand response [dial-a-ride] system. These services on a rare occasion may encounter LEP individuals which serves the general public.

### **4. The resources available to the City of Maple Grove and overall cost to provide LEP assistance.**

The City of Maple Grove assessed its available resources that could be used for providing LEP assistance, and has determined that it could afford a professional interpreter and translation service on an as-needed basis. Furthermore, has determined that its pocket schedule and dial-a-ride brochure would be the two most important documents to be translated if the need should

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arise. Finally, the City of Maple Grove could partner with for outreach and translation efforts with outside organizations given such services do not exist within the organization. The amount of staff and driver training that might be needed was also considered. Based on the four-factor analysis, the City of Maple Grove developed its LEP Plan as outlined in the following section.

### **Limited English Proficiency [LEP] Plan Outline**

The City of Maple Grove has narrowed down the options to assist LEP individuals to utilize Fixed Route and Dial-a-Ride transportation services. Professional interpreter and document translation services will be provided as needed given the overall low percentage of LEP persons within the City of Maple Grove.

### **Language Assistance Measures**

Although there is a very low percentage in the City of Maple Grove of LEP individuals, that is, persons who speak English “not well” or “not at all”, the City of Maple Grove will ensure that the following measures are in place:

- The City of Maple Grove Title VI Policy and Limited English Proficiency Plan will be posted on the agency website: at [www.maple-grove.mn.us](http://www.maple-grove.mn.us) .
- When an interpreter is needed, in person or on the telephone, staff will attempt to determine what language is required and then access language assistance service.

### **Staff Training**

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

- Information on the City of Maple Grove’s Title VI Policy and LEP responsibilities.
- Description of language assistance services offered to the public.
- Documentation of language assistance and document translation requests via **Exhibit B**.
- How to handle a potential Title VI/LEP complaint.

### **Outreach Techniques**

Due to the small local LEP population, City of Maple Grove initiated outreach activities are expected to be minimal, but the following procedure will be utilized as the need arises:

- When staff prepares a document, or schedules a meeting, for which the target audience is expected to consist of primarily LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.
- Bus schedules, maps, and other transit publications will be made available online in an alternative language when and if a specific and concentrated LEP population is identified.

### **Monitoring and Updating the LEP Plan**

The City of Maple Grove will update the LEP every three years as required by the U.S. DOT. In addition the plan will be reviewed and updated when it is clear that higher concentrations of LEP individuals are present in the City of Maple Grove service area.

### Dissemination of the City of Maple Grove LEP Plan

A link to the City of Maple Grove LEP Plan and the Title VI Plan will be included on the Maple Grove Transit website, [www.maplegrovetransit.org](http://www.maplegrovetransit.org)

Any person or agency with internet access will be able to access and download the plan from The City of Maple Grove website. Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail, or in person, and shall be provided a copy of the plan at no cost. LEP individuals may request copies of the plan in translation which the City of Maple Grove will provide, if feasible. Questions or comments regarding the LEP Plan may be submitted to the City of Maple Grove as follows:

Michael Opatz  
Transit Administrator  
City of Maple Grove  
P.O. Box 1180  
12800 Arbor Lakes Parkway  
Maple Grove, MN 55311  
Phone: 763-494-6001

**Maple Grove Transit Policy Manual - Chapter 3: Title VI**

**Exhibit A**

**Maple Grove Transit  
Limited English Proficiency Plan  
2013 Driver Survey**

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Executive Order 13166, titled Improving Access to Services for Persons with Limited English Proficiency, indicates that differing treatment based upon a person’s inability to speak, read, write or understand English is a type of national origin discrimination.

As a result, to ensure compliance with the above federal regulations, Maple Grove Transit has developed a Limited English Proficiency Plan to help identify reasonable steps for providing language assistance to persons with **limited English proficiency [LEP]** who wish to access services provided by Maple Grove Transit. An LEP person is defined as person who does not speak English as their primary language and have limited ability to read, speak, write or understand English.

One component of Maple Grove Transit’s Limited English Proficiency Plan includes a driver survey to help assess the number and frequency that LEP persons use Maple Grove Transit. Please complete the survey by **November 1, 2013** and return to the MJR Garage Dispatch Office. Your Driver Badge ID and completion date must be filled in below. Your assistance is greatly appreciated. Thank you.

1. In the past 30 days, do recall coming into contact with LEP bus riders while driving a Maple Grove Transit bus?
  - a.  Yes    b.  No *(Check one response – If yes, continue to question 2, if no, your survey is complete).*
  
2. If yes to question 1, on average, how many times a week do you come into **contact** with LEP bus riders while driving a Maple Grove bus? \_\_\_\_\_
  
3. If yes to question 1, on average, how many times a week do you **provide assistance** to LEP bus riders while driving a Maple Grove bus? \_\_\_\_\_
  
4. If yes to question 1, if known, please list the non-English languages spoken by the LEP bus riders you encountered on the Maple Grove buses: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

**Driver Name and Badge ID #** \_\_\_\_\_  
**Date Completed** \_\_\_\_\_

**Maple Grove Transit Policy Manual - Chapter 3: Title VI**

**Maple Grove Transit  
2013 Limited English Proficiency Plan  
Dial-A-Ride Survey of Drivers and Customer Service Reps**

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Executive Order 13166, titled Improving Access to Services for Persons with Limited English Proficiency (LEP), indicates that differing treatment based upon a person’s inability to speak, read, write or understand English is a type of national origin discrimination.

As a result, to ensure compliance with the above federal regulations, Maple Grove Transit has developed a Limited English Proficiency Plan to help identify reasonable steps for providing language assistance to persons with **Limited English Proficiency [LEP]** who wish to access services provided by Maple Grove Transit. An LEP person is defined as person who does not speak English as their primary language and have limited ability to read, speak, write or understand English.

One component of Maple Grove Transit’s Limited English Proficiency Plan includes a survey to help assess the number and frequency that LEP persons use Maple Grove Transit. Please complete the survey by **November 1, 2013** and return to the Bill Patten. Your name or Driver Badge ID and completion date must be filled in below. Your assistance is greatly appreciated. Thank you.

1. In the past 30 days, do recall coming into contact with LEP customers while driving a Maple Grove Dial-A-Ride bus or on the phone as Customer Service Rep?
  - a.  Yes    b.  No *(Check one response – If yes, continue to question 2, if no, your survey is complete).*
  
2. If yes to question 1, on average, how many times a week do you come into **contact** with LEP customer? \_\_\_\_\_
  
3. If yes to question 1, on average, how many times a week do you **provide assistance** to a LEP customer? \_\_\_\_\_
  
4. If yes to question 1, if known, please list the non-English languages spoken by the LEP customer you encountered: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

**Name or Badge ID #** \_\_\_\_\_  
**Driver or Customer Service Reps (Circle One)**  
**Date Completed** \_\_\_\_\_

**Exhibit B**

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

Date of Inquiry or Request: \_\_\_\_\_

Request for Interpreter: \_\_\_\_\_ yes \_\_\_\_\_ no

- Language \_\_\_\_\_

Request for Translated Document: \_\_\_\_\_ yes \_\_\_\_\_ no

- Language \_\_\_\_\_
- Name of Document \_\_\_\_\_

Contact Info for Person Making the Request \_\_\_\_\_

Summary of Action and Conclusion \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Appendix 5**

**Appendix 5** includes a table depicting the racial breakdown of the membership of the Maple Grove Transit Commission. It also includes a sample application and process used to recruit members when vacancies occur on the Commission.

<b>Transit Commission Member Name</b>	<b>Reported Race</b>
Route 781 Representative	white
Route 780 Representative	white
Route 789 Representative	white
Route 785 Representative	white
Route 783 Representative	white

## Maple Grove Transit Policy Manual - Chapter 3: Title VI

### Maple Grove Transit Transit Commission Application Process

Transit Commission members must be a resident of the City of Maple Grove and ride the services at least three times a week on a regular basis. Historically, applicants have been primarily solicited by placing the application on the buses as a Rider Alert flyer. Federal regulations under the Civil Rights Title VI program require transit programs receiving federal funding to follow the clause below:

- *Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar bodies, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees or councils.*

While the City is challenged to find relevant organizations within Maple Grove to send applications to boost recruitment efforts for minorities, the applications will be sent to:

- Places of Worship in Maple Grove
- Northwest Hennepin Human Services Council
- Maple Grove Library
- City of Maple Grove website
- Maple Grove Patch
- Osseo-Maple Grove Press and News
- Maple Grove Community Center
- Osseo Area Schools District 279
- CROSS Food Shelf
- Housing for All
- Maple Grove Transit buses

The following language was also added to the *attached* application:

All individuals encouraged to apply. The City of Maple Grove is committed to a policy of nondiscrimination in relation to *race, color, creed, religion, age, national origin, sex, sexual orientation, marital status, public assistance status, disability, handicap or political affiliation.* .  
Maple Grove is an Equal Opportunity/Affirmative

## Maple Grove Transit Policy Manual - Chapter 3: Title VI

September 26, 2013

Greetings;

**Subject: Maple Grove Transit Commission Application**

You are receiving this letter because Maple Grove Transit is seeking your assistance in helping us solicit applicants to fill a vacancy on the Maple Grove Transit Commission. To be eligible, applicants must be a resident of the City of Maple Grove and ride the transit services at least three times a week on a regular basis.

Historically, applicants have been primarily solicited by placing the application on the buses. Federal regulations under the Civil Rights Title VI program require transit programs receiving federal funding to increase efforts to encourage the participation of minorities on advisory commissions. As a result, Maple Grove Transit is sending applications to the following:

- Places of Worship in Maple Grove
- Northwest Hennepin Human Services Council
- Maple Grove Library
- City of Maple Grove website
- Maple Grove Patch
- Osseo-Maple Grove Press and News
- Maple Grove Community Center
- Osseo Area Schools District 279
- CROSS Food Shelf
- Housing for All
- Maple Grove Transit buses

Your consideration to post or publish the attached application is greatly appreciated. Applications are due by October 21, 2013. Thank you.

Sincerely,

Michael Opatz  
Transit Administrator  
763-494-6005

*Example of Solicitation Flyer*

## **Vacancy on Maple Grove Transit Commission Route 782 Representative**

The City of Maple Grove is accepting applications for a vacancy on the Maple Grove Transit Commission representing Route 782.

The commission exists in order to provide user input into the operations and assess future transit needs. The commission typically meets the last Tuesday of January, March, May, July, September and November at 6:30 p.m. Members serve two-year terms. Commission members must be a Maple Grove resident and use the service on average three days a week.

For an application, contact the Transit Administrator at [transit@maplegrovern.gov](mailto:transit@maplegrovern.gov) or 763-494-6005. Applications are also available at [www.maplegrovetransit.org](http://www.maplegrovetransit.org) under Rider Alerts. ***Applications are due by October 21, 2013.***

*All individuals are encouraged to apply. The City of Maple Grove is committed to a policy of nondiscrimination in relation to race, color, creed, religion, age, national origin, sex, sexual orientation, marital status, public assistance status, disability, handicap or political affiliation. Maple Grove is an Equal Opportunity/Affirmative Action employer.*

**Maple Grove Transit Policy Manual - Chapter 3: Title VI**

*Sample Application*

**Application for Maple Grove Transit Commission – Route 782**

The City of Maple Grove is accepting applications for a vacancy on the Maple Grove Transit Commission representing Route 782. The commission exists in order to provide user input into the operations and assess future transit needs. The commission typically meets the last Tuesday of January, March, May, July, September and November at 6:30 p.m. Members serve two-year terms. Commission members must be a Maple Grove resident and use the service on average three days a week. Send completed Application to Mike Opatz, Transit Administrator, City of Maple Grove, P.O. Box 1180, Maple Grove, MN 55311-6180. You may fax or e-mail your application to 763-494-6421 or [transit@maplegrovern.gov](mailto:transit@maplegrovern.gov). If you have questions, please call 763-494-6005. ***Please submit application by October 21, 2013.***

Name \_\_\_\_\_

Address \_\_\_\_\_

Resident of Maple Grove (years) \_\_\_\_\_ Phone (home) \_\_\_\_\_

Current Bus Route/Trip# \_\_\_\_\_ How often do you ride \_\_\_\_\_ How long have you been riding \_\_\_\_\_

Name of Employer \_\_\_\_\_ Occupation \_\_\_\_\_ Phone (work) \_\_\_\_\_

Education (Please indicate highest grade completed or highest degree and major course of study)  
\_\_\_\_\_

Please list past and present civic activities and organizational memberships, particularly those which may be relevant to the appointment you are seeking. Use additional pages as necessary.

\_\_\_\_\_  
\_\_\_\_\_

Briefly describe other qualifications, experience, and other information which you would like the City to consider or which you believe are particularly relevant to the appointment you are seeking. Use additional pages as necessary.

\_\_\_\_\_  
\_\_\_\_\_

Briefly describe your primary motivation for appointment to the Transit Commission. Use additional pages as necessary.

\_\_\_\_\_  
\_\_\_\_\_

This application will be retained for one year from date of receipt.

Date Received: \_\_\_\_\_ Date Appointed \_\_\_\_\_

**Data Privacy Information** - The information provided by you on this application will be used to determine your suitability for appointment to a board or commission with the City of Maple Grove and to provide you with information pertaining to your application for this committee or board. If you are selected, a list containing your name, address and telephone number(s) will be distributed to appropriate staff. Participation as a board/commission member is strictly voluntary, and you are not required by law to furnish any of the information requested on this application. If you do not furnish this information, however, we may have trouble determining your suitability for appointment, contacting you with information regarding your application and, if selected, with your duties on the board or commission. Under Minnesota State statutes, the following information about you is public: name, address and city/state/zip code, job history, education and training and work availability. Any other information collected on this application form is private data and will be accessible only to you, pertinent City of Maple Grove staff, or as provided for by Minnesota statutes.

*All individuals are encouraged to apply. The City of Maple Grove is committed to a policy of nondiscrimination in relation to race, color, creed, religion, age, national origin, sex, sexual orientation, marital status, public assistance status, disability, handicap or political affiliation. Maple Grove is an Equal Opportunity/Affirmative Action employer.*

