

# **Metropolitan Council Title VI Limited English Proficiency Language Assistance Plan**

2023-2025



## About the Metropolitan Council

The Metropolitan Council is the regional policy-making body, metropolitan planning organization (MPO), and provider of essential services for the Twin Cities metropolitan region. The Council's mission is to foster efficient and economic growth for a prosperous region.

The 17-member Metropolitan Council is a policy board, which has guided and coordinated the strategic growth of the metro area and achieved regional goals for over 50 years. Elected officials and citizens share their expertise with the Council by serving on key advisory committees.

The Council also provides essential services and infrastructure – Metro Transit's bus and rail system, Metro Mobility, Transit Link, wastewater treatment services, regional parks, planning, affordable housing, and more – that support communities and businesses and ensure a high quality of life for residents.

## Metro Transit

Metro Transit is an operating division of the Metropolitan Council and offers an integrated network of buses, light rail transit, and commuter trains, as well as resources for those who carpool, vanpool, walk, or bike. The largest public transit operator in the region, Metro Transit provides approximately 85% of the transit trips taken annually in the Twin Cities. Metro Transit served nearly 33 million bus and rail passengers in 2021 with award-winning, energy-efficient fleets. As is the trend throughout the transit industry, this number has dropped significantly since the pandemic started in March 2020.

Metro Transit operates the METRO Green Line, METRO Blue Line, NorthStar commuter rail line and 125 bus routes, using a fleet of about 916 buses and 100 rail vehicles. In the last three years, Metro Transit opened the METRO Orange Line, a highway bus rapid transit (BRT) lines that compliments the METRO Red and A and C lines. Several more BRT lines are in development as Metro Transit seeks to expand the region's METRO network. Metro Transit continues to develop and refine local and enhanced service throughout the region.

## Other Transportation Services

The Metropolitan Council's Metropolitan Transportation Services (MTS) division oversees operations of Metro Mobility, Transit Link, and contracted fixed routes.

MTS contracted fixed routes are operated by private providers using Council-owned vehicles. However, these routes are branded as Metro Transit routes and are subject to the same policies as regular Metro Transit fixed routes. For the purposes of Title VI and language assistance, MTS routes are treated like any other Metro Transit fixed route, unless otherwise noted.

The Metropolitan Council also provides services that meet the needs of those not served by or not able to use Metro Transit.

Metro Mobility is a shared public transportation service for certified riders who are unable to use regular fixed route buses due to a disability or health condition. Eligibility is determined by the Federal Americans with Disabilities Act. Rides are provided for any purpose. Customers are eligible for Metro Mobility service if they are physically unable to get to the regular fixed route bus, they are unable to navigate regular fixed route bus systems once they are on board, or they are unable to board and exit the bus at some locations.

Transit Link is the Twin Cities dial-a-ride small bus service. It provides transportation to the public where regular route transit service is not available. Transit Link is for trips that cannot be accomplished on regular transit routes alone and may combine regular route and Transit Link service. Anyone may reserve a Transit Link ride for any purpose, subject to availability.

# Background

On October 1, 2012, the United States Department of Transportation (DOT) published revised guidance for its recipients on the Implementation of Executive Order 13166, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients." This document reiterates the requirement that FTA funded recipients take responsible steps to ensure meaningful access to benefits, services, and information for LEP persons and suggests that FTA recipients and sub-recipients. This requirement includes the following analysis:

- Identifying the number or proportion of LEP persons served or encountered in the recipient's service area;
- Determining the frequency with which Populations with limited English proficiency come into contact with the recipient's services;
- Determining the nature and importance of the services to LEP people; and
- Assessing the current resources available and the costs to provide Language Assistance Services.

Recipients and sub-recipients must then develop a language implementation plan consistent with the provisions of Section VII of the DOT LEP Guidance. The following information summarizes the Council, Metro Transit, Metro Mobility, and First Transit's LEP analysis and Language Assistance Plan.

## Purpose

The following document serves as the Title VI Limited English Proficiency Language Assistance Plan for the Council's Metro Transit, Metro Mobility, and Transit Link services. This document demonstrates the Council's commitment to provide meaningful access to all individuals accessing the Council's services. Internally this plan is intended for department managers and supervisors, and for staff who interact directly or indirectly with limited English proficiency (LEP) individuals.

LEP legal requirements also apply to sub-recipients, subcontractors and vendors who do business with the Council. LEP community members and advocates can refer to this plan to learn about the Council's commitment to equal access.

Dissemination of the Limited English Proficiency Plan is to occur via many routes. Any internal or external individual will be able to access the plan via the Internet. Populations with limited English proficiency can obtain copies/translations upon request.

Further questions regarding this plan may contact:

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## Authority

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., provides that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance. The Supreme Court, in *Lau v. Nichols*, 414 U.S. 563 (1974), interpreted Title VI regulations promulgated by the former Department of Health, Education, and

Welfare to hold that Title VI prohibits conduct that has a disproportionate effect on LEP persons because such conduct constitutes national origin discrimination.

Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency,” reprinted at 65 FR 50121, August 16, 2000 (Appendix A), directs each Federal agency to examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services. Federal agencies were instructed to publish guidance for their respective recipients in order to assist them with their obligations to LEP persons under Title VI. The Executive Order states that recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. President Bush affirmed his commitment to Executive Order 13166 through a memorandum issued on October 25, 2001, by Assistant Attorney General for Civil Rights, Ralph F. Boyd, Jr. Federal agencies were directed to provide guidance and technical assistance to recipients of Federal funds as to how they can provide meaningful access to Limited English Proficient users of Federal programs.

The U.S. DOT published revised guidance for its recipients on December 14, 2005 (Appendix B). This document states that Title VI and its implementing regulations require that DOT recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for Populations with limited English proficiency and that recipients should use the DOT LEP Guidance to determine how best to comply with statutory and regulatory obligations to provide meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are LEP.

The Federal Transit Administration (FTA) references the DOT LEP guidance in its Circular 4702.1B, “Title VI Requirements and Guidelines for Federal Transit Administration Recipients,” which was published on October 1, 2012. Chapter III part 9 of this Circular reiterates the requirement to take responsible steps to ensure meaningful access to benefits, services, and information for LEP persons and suggests that FTA recipients and sub-recipients develop a language implementation plan consistent with the provisions of Section VII of the DOT LEP Guidance.

The DOT LEP Guidance recommends that all recipients, especially those that serve large Populations with limited English proficiency, should develop an implementation plan to address the needs of the Populations with limited English proficiency they serve. The DOT LEP Guidance notes that effective implementation plans typically include the following five elements:

- 1) Identifying Populations with limited English proficiency who need language assistance:
- 2) Providing language assistance measures
- 3) Training staff
- 4) Providing notice to LEP persons
- 5) Monitoring and updating the plan

## Responsibilities

The Council Regional Administrator has designated the ADA & Title VI Administrator as the Council’s Language Assistance Liaison. The Language Assistance Liaison will be responsible for developing, executing, and coordinating language services to LEP persons, and will collaborate with any sub-recipients covered under Title VI to ensure that they satisfy their LEP requirements. OEO is designated the lead department for LEP initiatives to assist the Language Assistance Liaison in ensuring that the Council, Metro Transit, Metro Mobility, and Transit Link continue to serve Customers with limited English proficiency. The Liaison will also investigate and resolve language access complaints from the LEP community.

# Identification of Persons with Limited English Proficiency in the Service Area

**DOT Guidance:** “There should be an assessment of the number or proportion of Populations with limited English proficiency eligible to be served or encountered and the frequency of encounters pursuant to the first two factors in the four-factor analysis.”

Metro Transit has addressed the federal requirements for assessing needs and providing services to Populations with limited English proficiency. The LEP needs assessment was conducted based on the Four-Factor Analysis, as outlined in the FTA Circular 4702.1B. This analysis includes:

- Identifying the number or proportion of LEP persons served or encountered in Metro Transit’s service area.
- Determining the frequency with which Populations with limited English proficiency come into contact with Metro Transit’s services.
- Determining the nature and importance of the services to LEP people; and
- Assessing the current resources available and the costs to provide Language Assistance Services.

As a result of the Four-Factor Analysis, Metro Transit and the Metropolitan Council will translate all vital documents into Spanish, Somali, Hmong, Vietnamese, and Karen. Details about how these languages were identified are described in the following sections.

## Number & Proportion of Persons with Limited English Proficiency in the Service Area

The U.S. Census Bureau collects data through the American Community Survey (ACS) to assess language characteristics within a geographic area. These data identify a person’s ability to speak English “very well” or less than “very well” and the language predominately spoken at home for those populations age 5 and older. The **2016-2020 ACS** provided quantitative information regarding Populations with limited English proficiency for the seven-county region and Metro Transit’s service area. An analysis of these data identified Populations with limited English proficiency and their language characteristics within the Metro Transit service area.

ACS data indicate that the total population within Metro Transit’s service area is **2,168,074**. In addition, **17%** of the total population is age 5 and older and speaks a language other than English at home (**369,267**). Of these individuals, **40% (147,814)** speak English less than “very well” representing **7%** of the total population within Metro Transit’s service area.

The Safe Harbor Provision, which the Department of Transportation adopted from the Department of Justice, stipulates that, “if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance.”

Table 1 lists Populations with limited English proficiency within Metro Transit’s service area according to the twelve foreign language classifications contained in the **2016-2020 ACS** at the tract level. No languages have Populations with limited English proficiency that exceed 5% of the total population in the service area. Eleven of the twelve languages classifications have Populations with limited English proficiency over 1,000.

Table 1: LEP Speakers in the Metro Transit Service Area

| Language                                    | Number of LEP Speakers | Pct. of Total LEP | Pct. of Total Population |
|---|------------------------|-------------------|--------------------------|
| Spanish                                     | 42,981                 | 29.1%             | 2.0%                     |
| Other Asian and Pacific Island languages    | 41,337                 | 28.0%             | 1.9%                     |
| Other or unspecified languages              | 31,069                 | 21.0%             | 1.4%                     |
| Vietnamese                                  | 6,592                  | 4.5%              | 0.3%                     |
| Other Indo-European languages               | 5,927                  | 4.0%              | 0.3%                     |
| Chinese (incl. Mandarin, Cantonese)         | 5,789                  | 3.9%              | 0.3%                     |
| Russian, Polish, and other Slavic languages | 5,139                  | 3.5%              | 0.2%                     |
| French, Haitian, and Cajun                  | 3,054                  | 2.1%              | 0.1%                     |
| Arabic                                      | 2,735                  | 1.9%              | 0.1%                     |
| Korean                                      | 1,360                  | 0.9%              | 0.1%                     |
| Tagalog (incl. Filipino)                    | 1,045                  | 0.7%              | 0.0%                     |
| German and other West Germanic languages    | 786                    | 0.5%              | 0.0%                     |

## The Frequency of Contact Between Populations with limited English proficiency and the Council’s Transportation Services

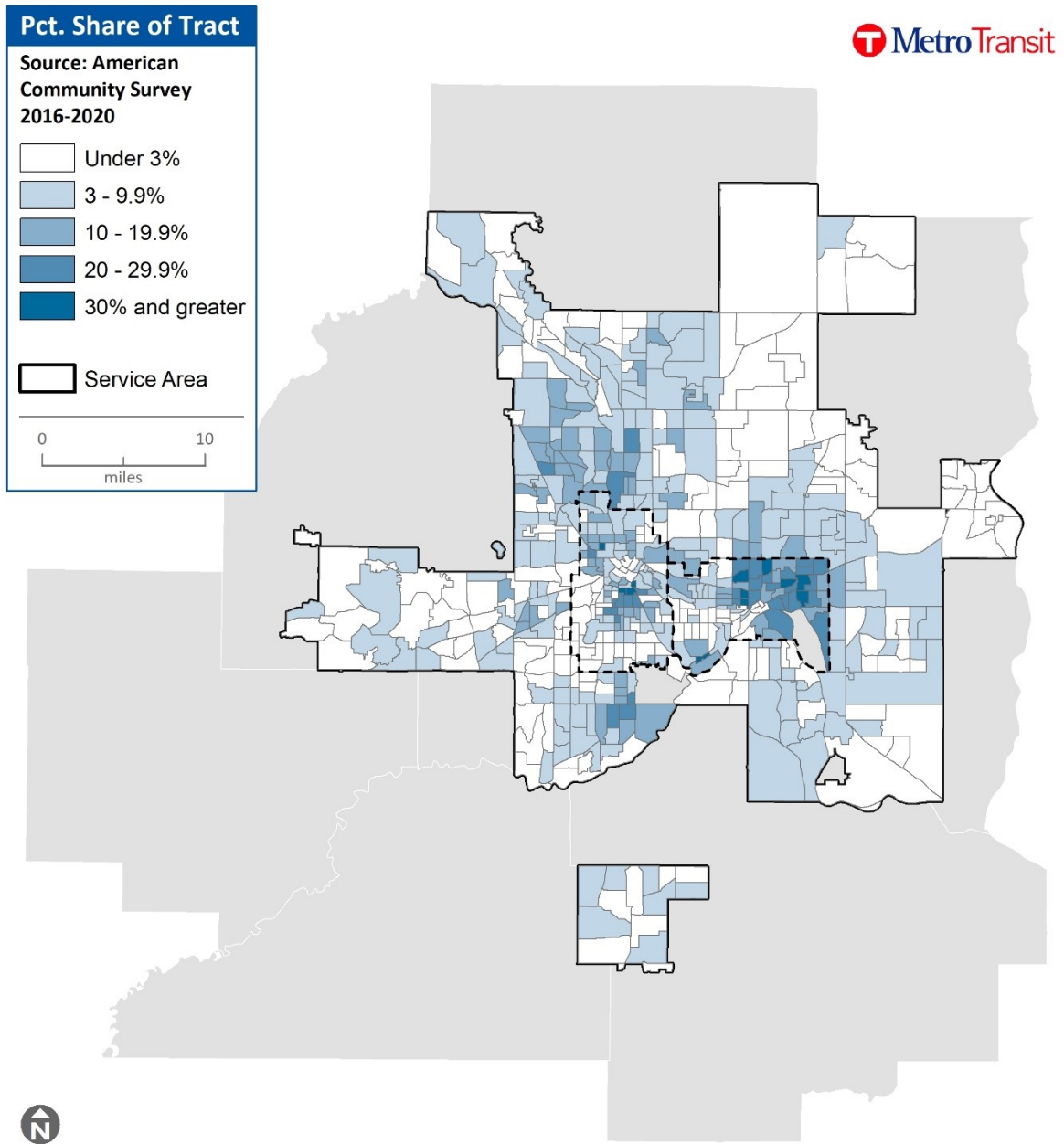
This section includes information describing how frequently our transportation services interact with LEP communities in the service area. This information is collected through reviewing LEP population distribution, data from the Minnesota Department of Education, Language Line usage and supplemental data.

### Interactions with Populations with limited English proficiency

#### LEP Population Distribution

Using the language categories contained in the **2016-2020 ACS**, Metro Transit mapped the concentrations of LEP communities within the service areas. Results of the geographic distribution indicate the greatest densities of LEP speakers are located within the limits of Metro Transit’s service area and along well-served transit corridors. Figure 1 demonstrates that LEP communities are concentrated in central and east Saint Paul, central and north Minneapolis, and cities to the northwest and south of Minneapolis.

**Figure 1 – Distribution of Limited English Proficiency, All Language Speakers**



***Distribution of Limited English Proficiency (LEP)\*  
All Language Speakers***

\* English spoken less than "very well," ages 5 and older

No languages have populations with limited English proficiency that exceed 5% of the total population in the service area. Eleven out of twelve languages and language groups included in the **2016-2020 ACS** have Populations with limited English proficiency over 1,000. The most frequently spoken language is Spanish, which is spoken by 29.2% of the LEP population in the service area. Vietnamese is also a prevalent language whose speakers comprise 4.5% of the LEP population.

For language classifications containing multiple languages, additional data beyond ACS is needed to determine how individual languages are represented among LEP populations that are likely to interact with Metro Transit service.

School district data provides insight into languages that are not individually available in the ACS. The Minnesota Department of Education reports student populations that are enrolled in English Learner (EL) programs. Twenty-nine school districts are within the Metro Transit service area, and EL students enrolled in these school districts represent LEP persons who are reasonably likely to interact with transit. Table 2 below shows the home languages of EL students enrolled in these school districts, where languages with over 100 student speakers are broken out separately.

Hmong and Karen are languages classified under “other Asian and Pacific Island languages”, and Somali is classified under “other and unspecified languages” in the **2016-2020 ACS**. Student enrollment data shows that Hmong, Karen, and Somali are languages with Populations with limited English proficiency above 1,000. While EL students who speak Hmong and Somali are enrolled widely across school districts, Karen-speaking EL students are primarily enrolled in school districts in and around Saint Paul.

**Table 2: English Learner (EL) students (K-12) enrolled at school districts within the transit service area**

| Language                                | Number of EL Students (K-12) |
|---|------------------------------|
| Spanish                                 | 12,450                       |
| Hmong                                   | 5,697                        |
| Somali                                  | 4,555                        |
| Karen                                   | 1,876                        |
| Oromo, Afan Oromo, Oromiffa             | 729                          |
| Arabic                                  | 529                          |
| Amharic                                 | 445                          |
| Vietnamese                              | 364                          |
| Nepali                                  | 251                          |
| Swahili, Kiswahili                      | 245                          |
| Chinese, Mandarin                       | 211                          |
| English, Creolized                      | 171                          |
| French                                  | 168                          |
| Tigrinya                                | 119                          |
| Russian                                 | 109                          |
| Other languages with fewer than 100 ELs | 1,095                        |

Spanish has an LEP community that accounts for over 5% of the total LEP population; similarly, Hmong, Karen, and Somali are within language classifications that each account for over 5% of the total LEP population. Given EL enrollment data, it is assumed that more than 1,000 persons speaking each of these languages interact with transit, so vital documents will be translated into these languages.

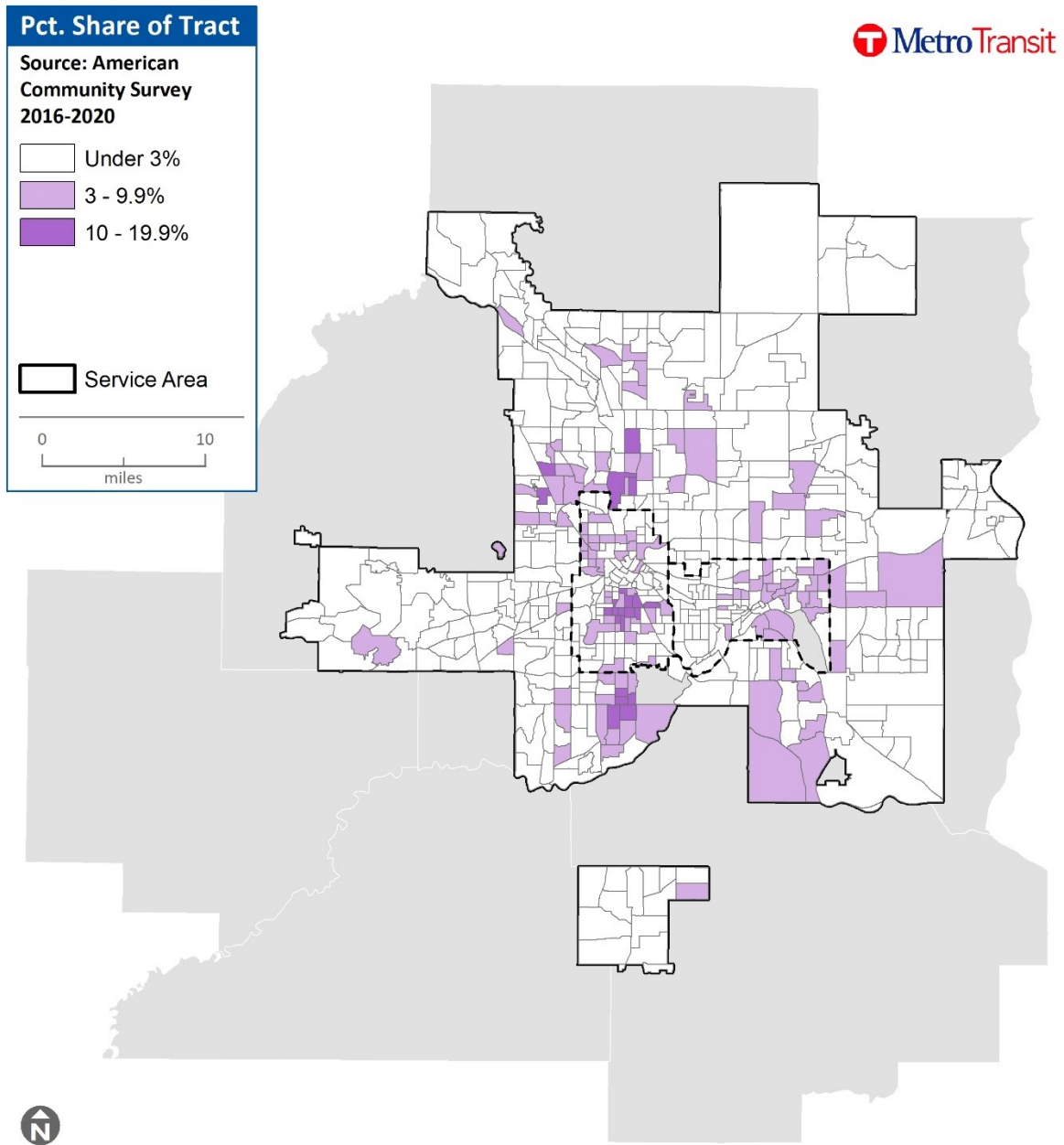


Among EL enrollment, no other languages besides Hmong and Karen are within “Other Asian and Pacific Islander languages” and represent the primary language of at least 100 students. Within “Other or unspecified languages,” the languages of Somali, Oromo, Amharic, Swahili, and Tigrinya each represent the primary language of at least 100 students. Somali is the only language with over 1,000 EL students. No further analysis of other “Other Asian and Pacific Islander languages” and “Other or unspecified languages” is necessary given the lack of specific ACS population data and lower EL enrollment of other languages besides Hmong, Karen, and Somali.

Figures 2-11 map the tract-level distribution of Populations with limited English proficiency in the service area by each of the twelve language classifications of the **2016-2020 ACS**. Maps are not shown for German because no tracts in the service area exceed a minimum threshold of 3% LEP speakers in the total tract population. The following maps indicate:

- LEP Spanish speakers are widely dispersed relative to other language groups and are in both urban and suburban communities (Figure 2).
- LEP speakers of “other Asian and Pacific Island languages” (i.e., Hmong and Karen) reside in North Minneapolis, in Saint Paul along University Avenue and on the East Side, and in suburbs in the north, northwest, and west metro (Figure 3).
- LEP speakers of “other and unspecified languages” (i.e., Somali) are dispersed throughout the metro, with communities concentrated in Central Minneapolis and along University Avenue in Saint Paul (Figure 4).
- LEP Vietnamese speakers are in north and northwest areas of the metro, but they also reside along University Avenue in Saint Paul (Figure 5).
- LEP speakers of other Indo-European languages are dispersed among communities in the north and west metro (Figure 6).
- LEP Chinese speakers live around the University of Minnesota, with other communities in the west and southwest metro suburbs (Figure 7).
- LEP speakers of Russian, Polish, and other Slavic languages reside in the west and northwest suburbs, but also in Highland Park in Saint Paul (Figure 8).
- LEP speakers of French, Cajun, and Haitian live in dispersed communities in the northwest, west, and south metro (Figure 9).
- LEP Arabic speakers reside in central Minneapolis as well as the north and south metro (Figure 10).
- LEP Korean speakers reside north of Saint Paul (Figure 11).
- LEP Tagalog speakers live east of downtown Saint Paul (Figure 12).

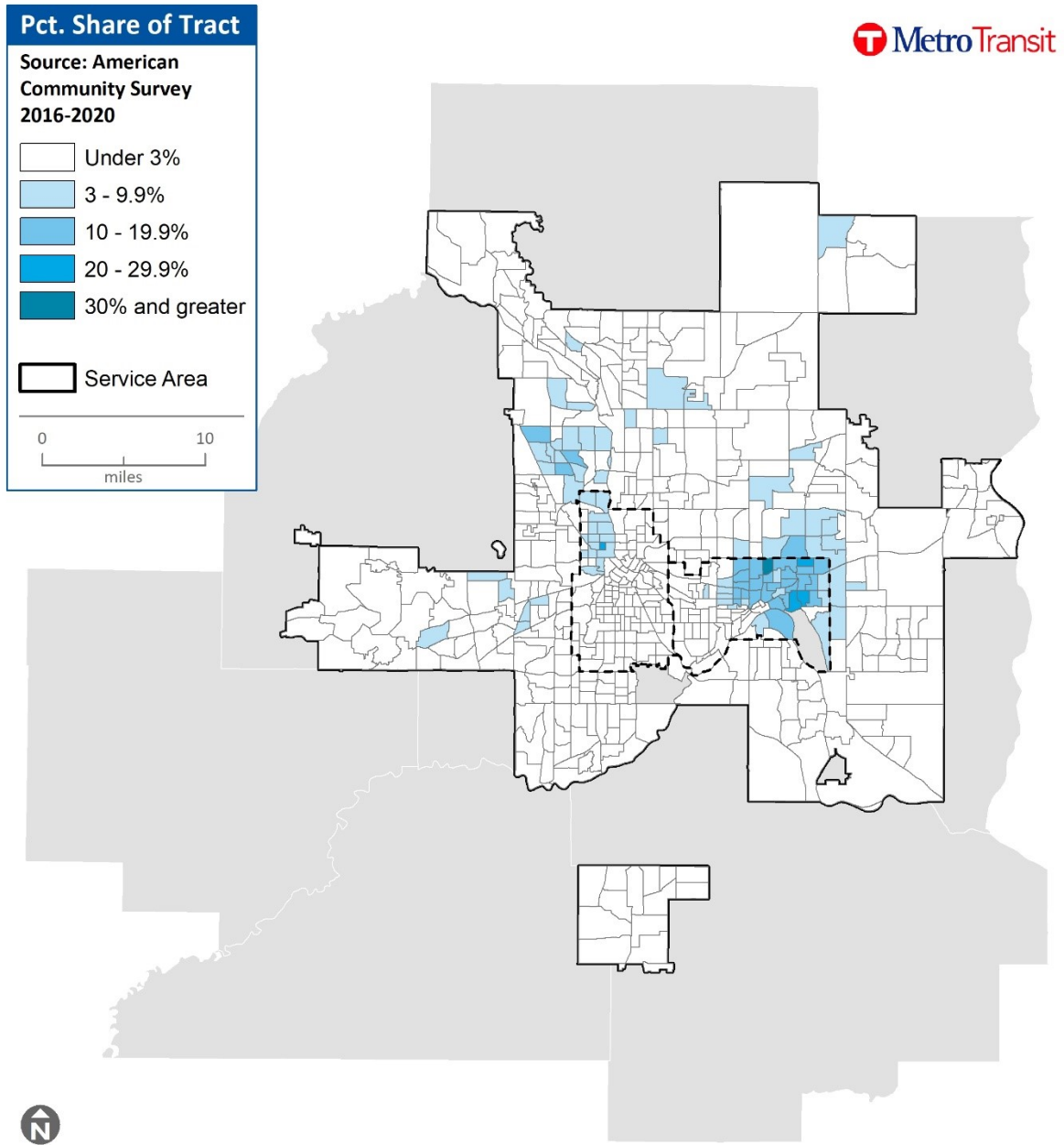
**Figure 2 – Distribution of Limited English Proficiency - Spanish Speakers**



***Distribution of Limited English Proficiency (LEP)\*  
Spanish Speakers***

\* English spoken less than "very well," ages 5 and older

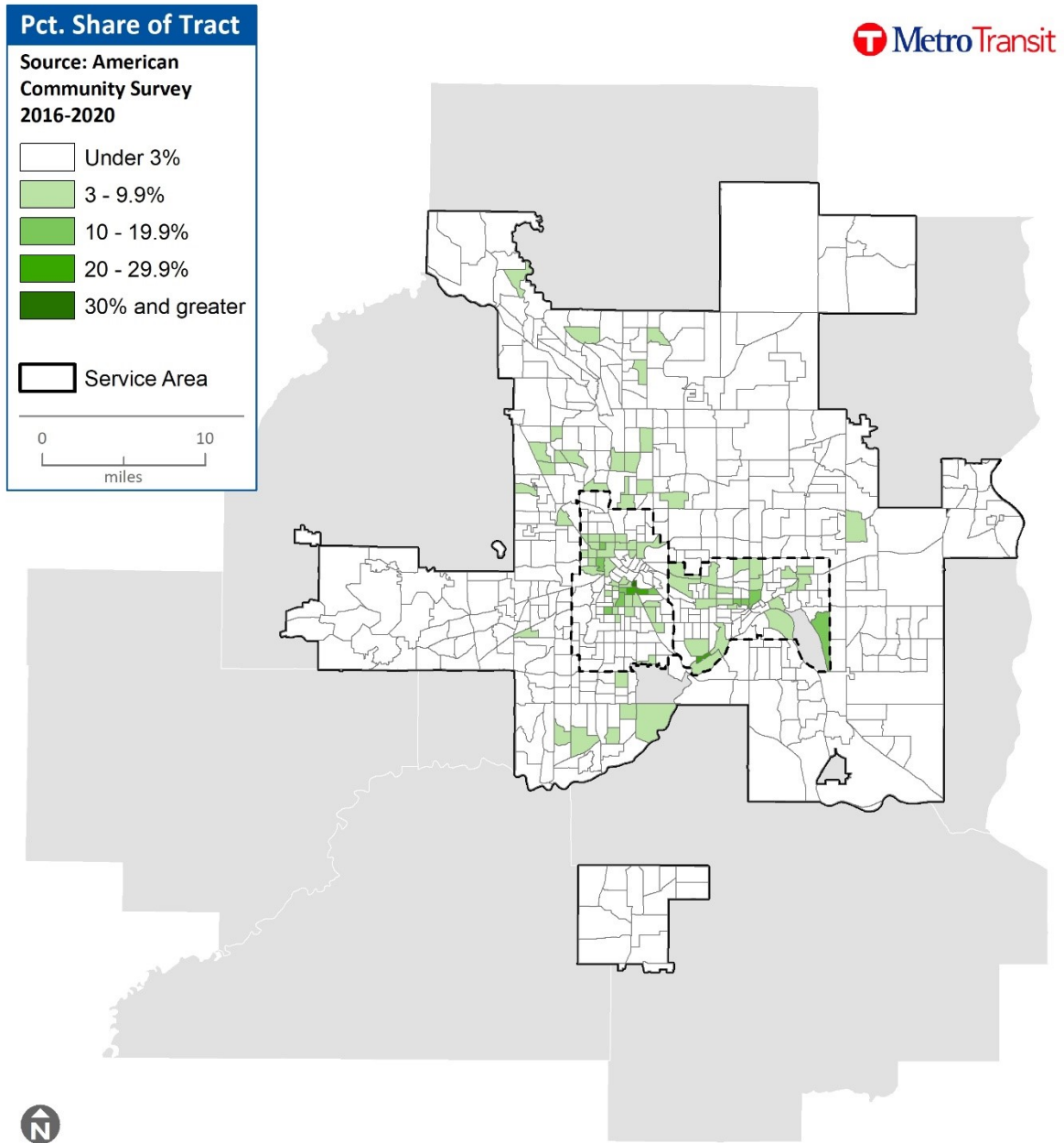
**Figure 3 – Distribution of Limited English Proficiency – Other (API)**



***Distribution of Limited English Proficiency (LEP)\*  
Other Asian and Pacific Island Language Speakers (includes Hmong and Karen)***

\* English spoken less than "very well," ages 5 and older

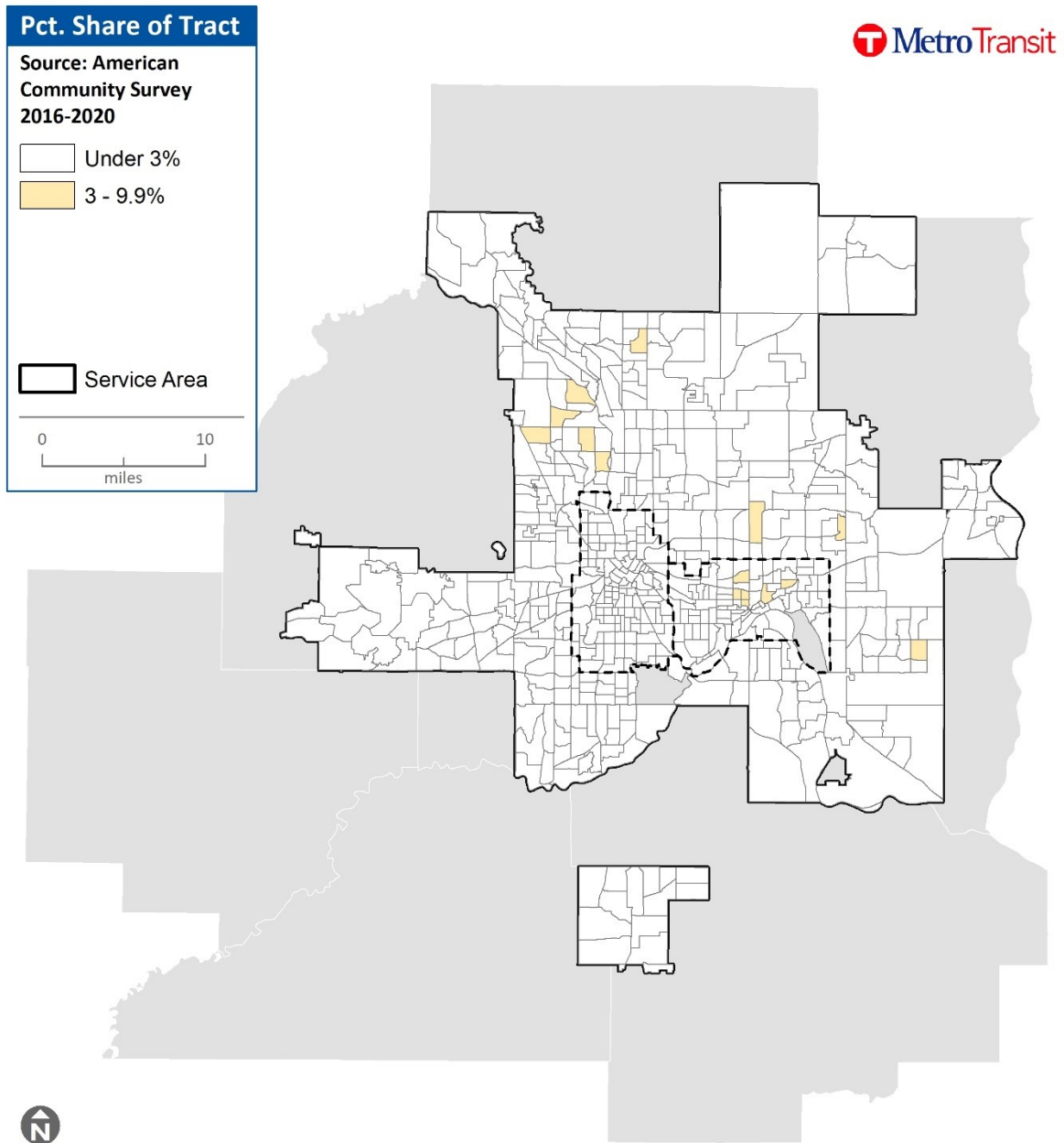
**Figure 4 - Distribution of Limited English Proficiency - Other and Unspecified**



***Distribution of Limited English Proficiency (LEP)\*  
Other and Unspecified Language Speakers (includes Somali)***

\* English spoken less than "very well," ages 5 and older

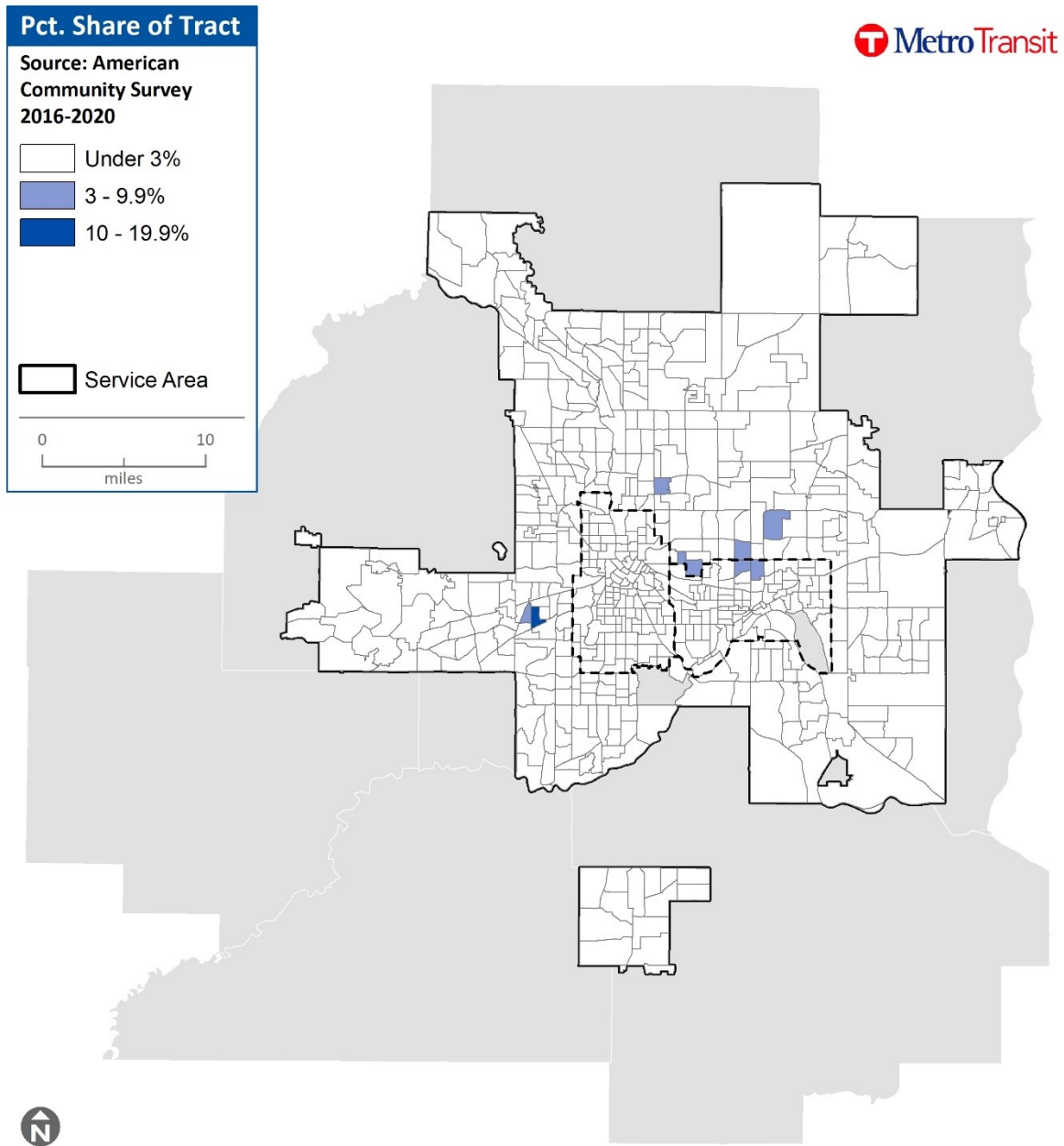
**Figure 5 - Distribution of Limited English Proficiency - Vietnamese**



***Distribution of Limited English Proficiency (LEP)\*  
Vietnamese Speakers***

\* English spoken less than "very well," ages 5 and older

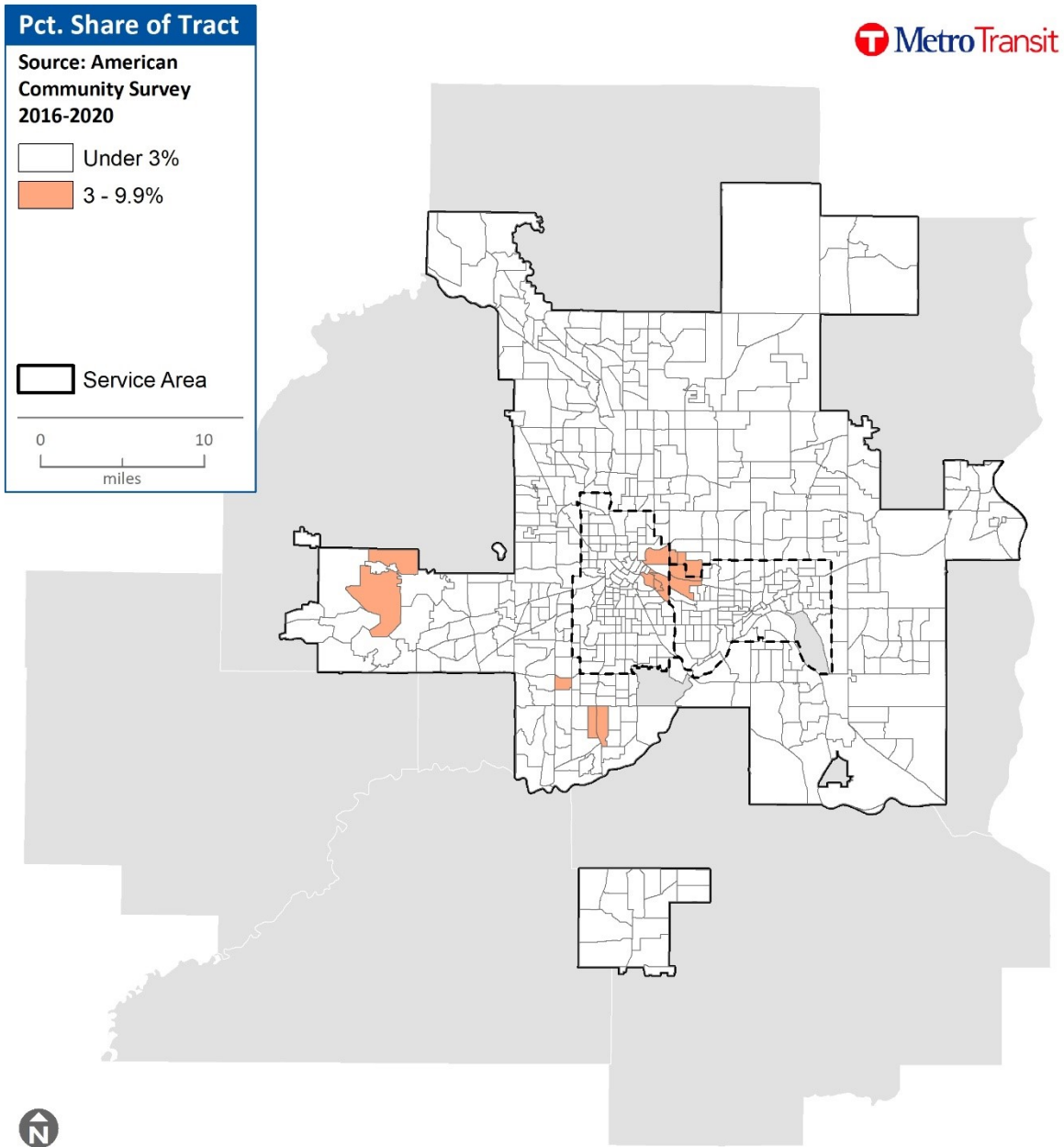
**Figure 6 - Distribution of Limited English Proficiency – Indo-European**



***Distribution of Limited English Proficiency (LEP)\*  
Other Indo-European Language Speakers***

\* English spoken less than "very well," ages 5 and older

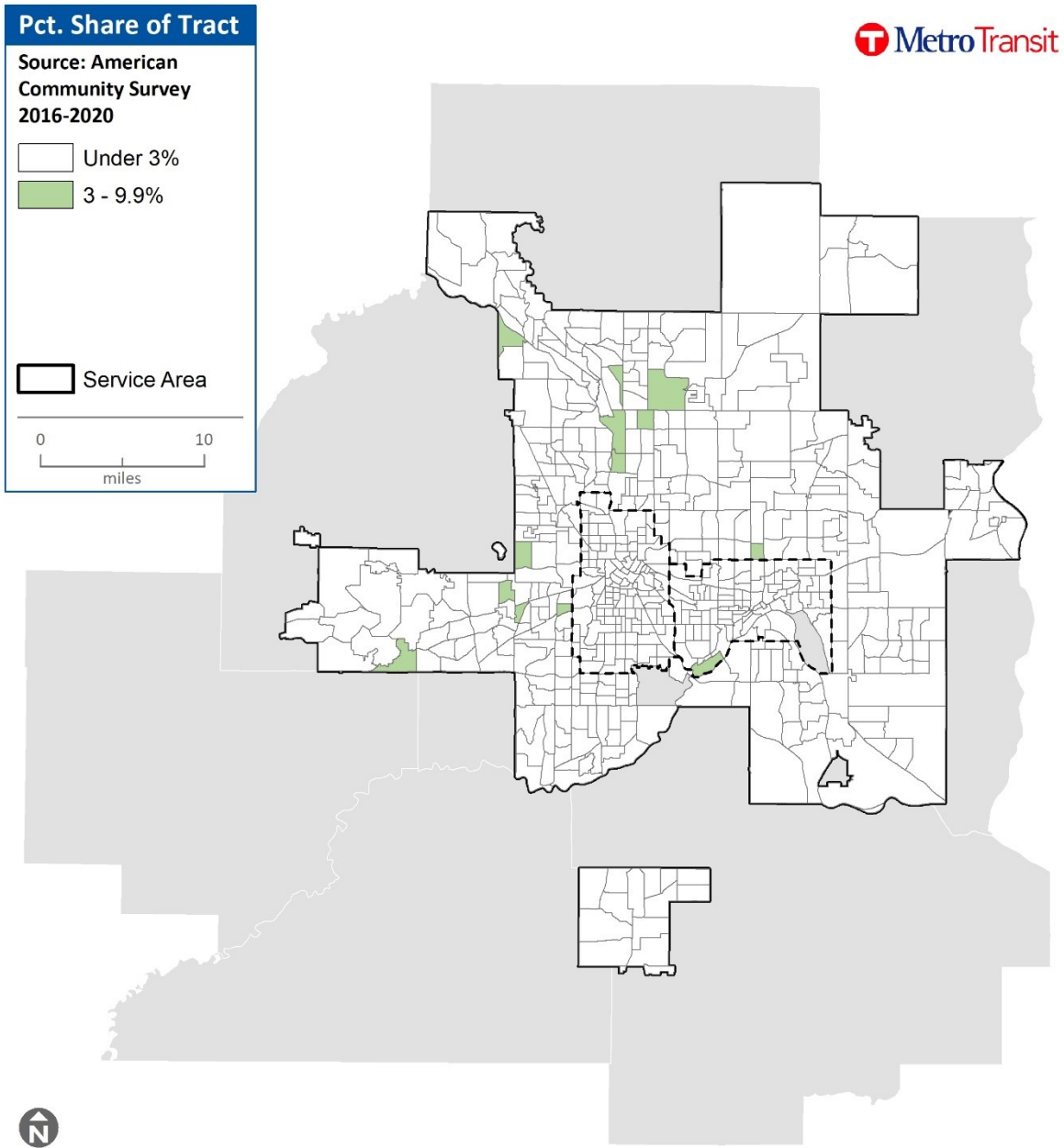
**Figure 7 - Distribution of Limited English Proficiency – Chinese**



***Distribution of Limited English Proficiency (LEP)\*  
Chinese Speakers (includes Mandarin and Cantonese)***

\* English spoken less than "very well," ages 5 and older

**Figure 8 - Distribution of Limited English Proficiency – Russian, Polish and Other Slavic**

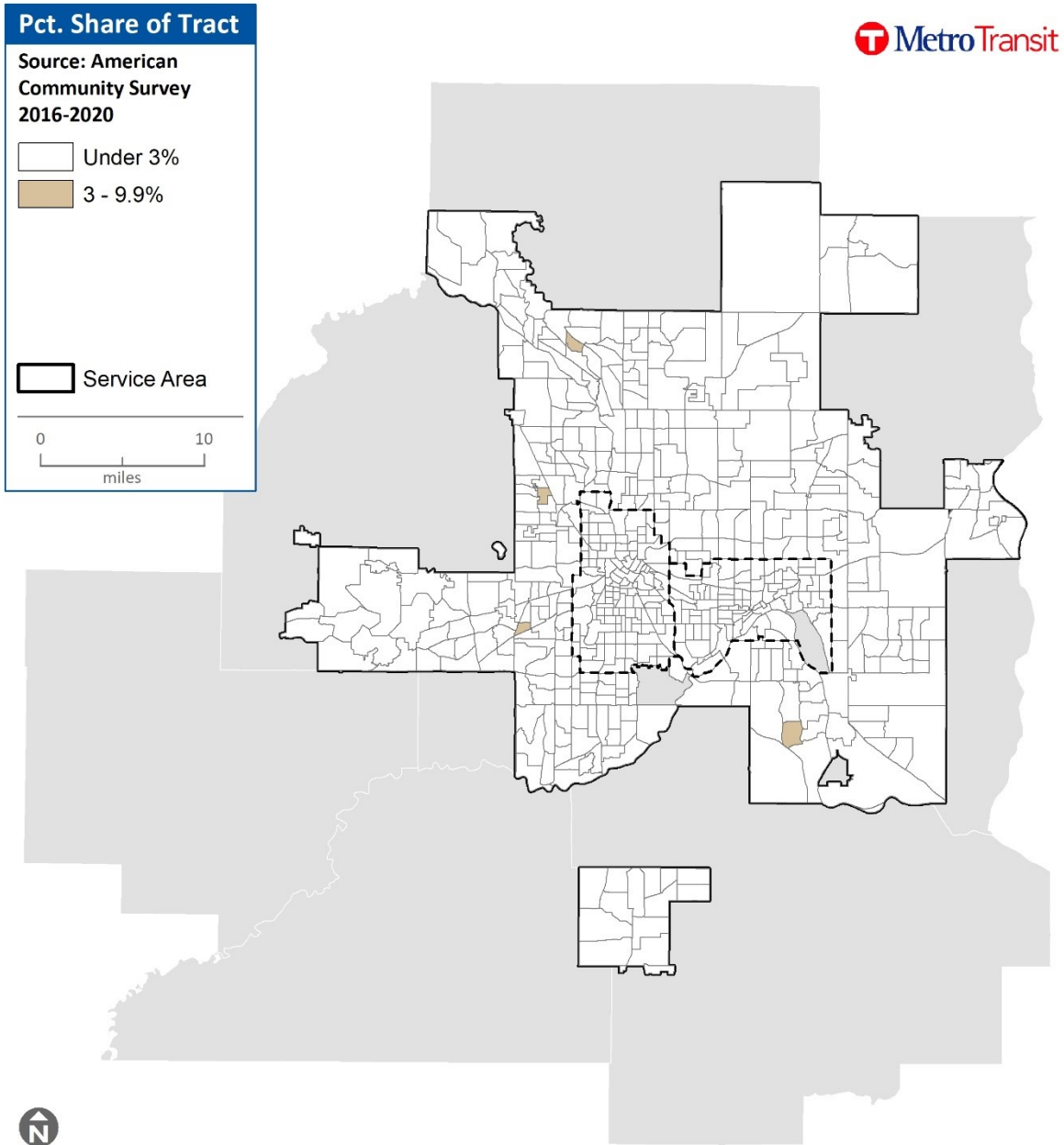


***Distribution of Limited English Proficiency (LEP)\*  
Russian, Polish, and Other Slavic Language Speakers***

\* English spoken less than "very well," ages 5 and older



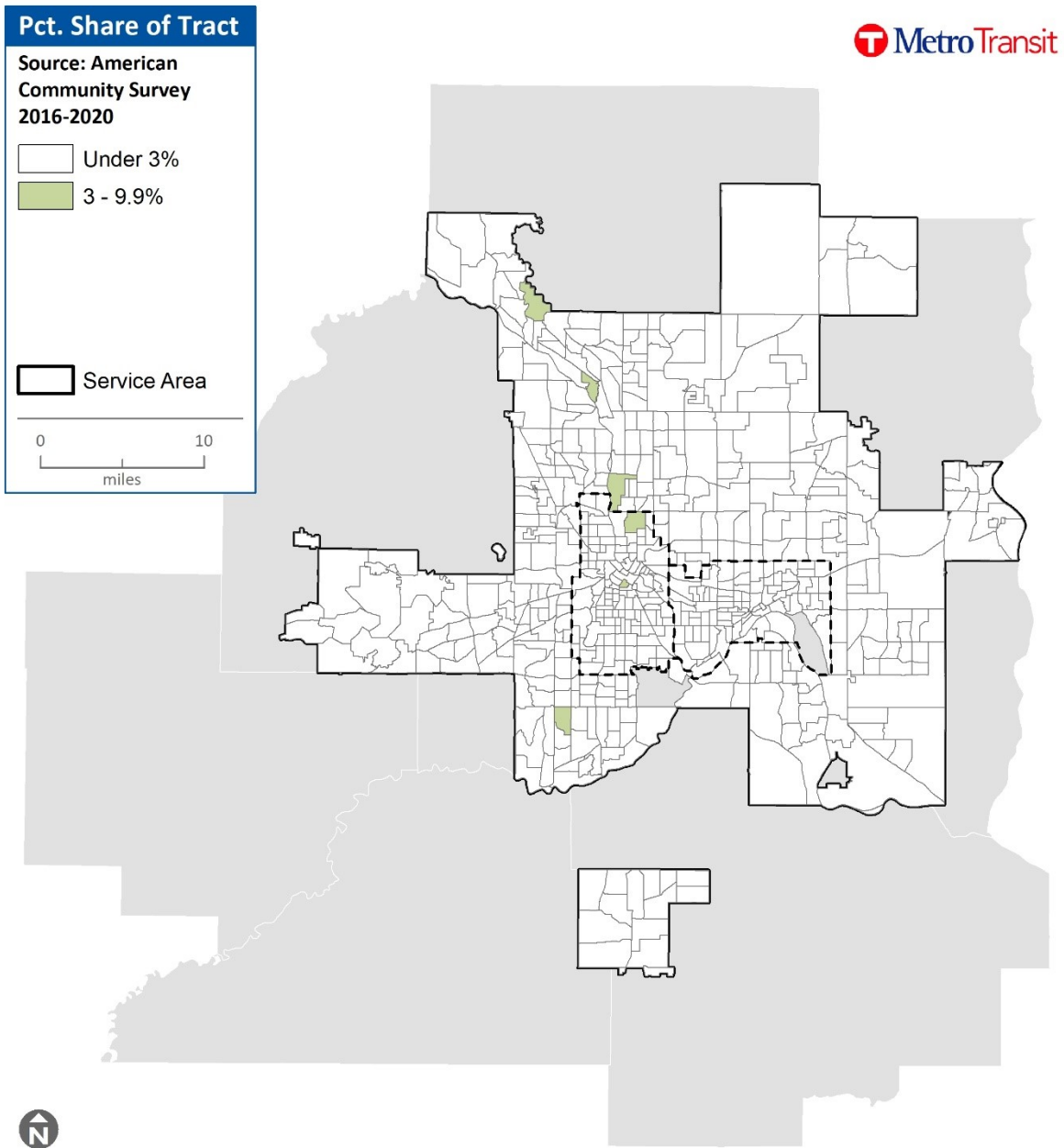
**Figure 9 - Distribution of Limited English Proficiency – French, Cajun, and Haitian**



***Distribution of Limited English Proficiency (LEP)\*  
French, Cajun, and Haitian Speakers***

\* English spoken less than "very well," ages 5 and older

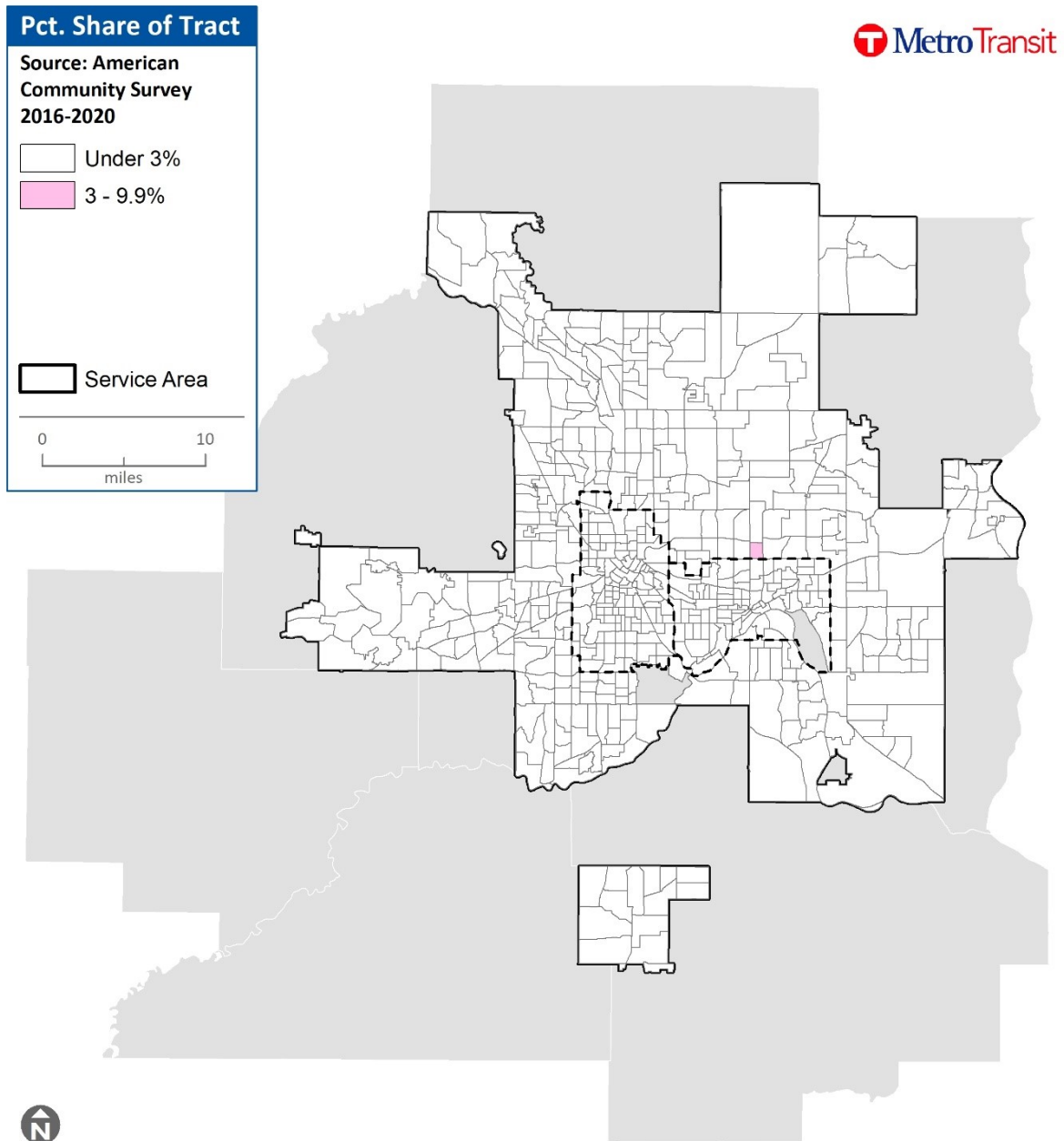
**Figure 10 - Distribution of Limited English Proficiency – Arabic**



***Distribution of Limited English Proficiency (LEP)\*  
Arabic Speakers***

\* English spoken less than "very well," ages 5 and older

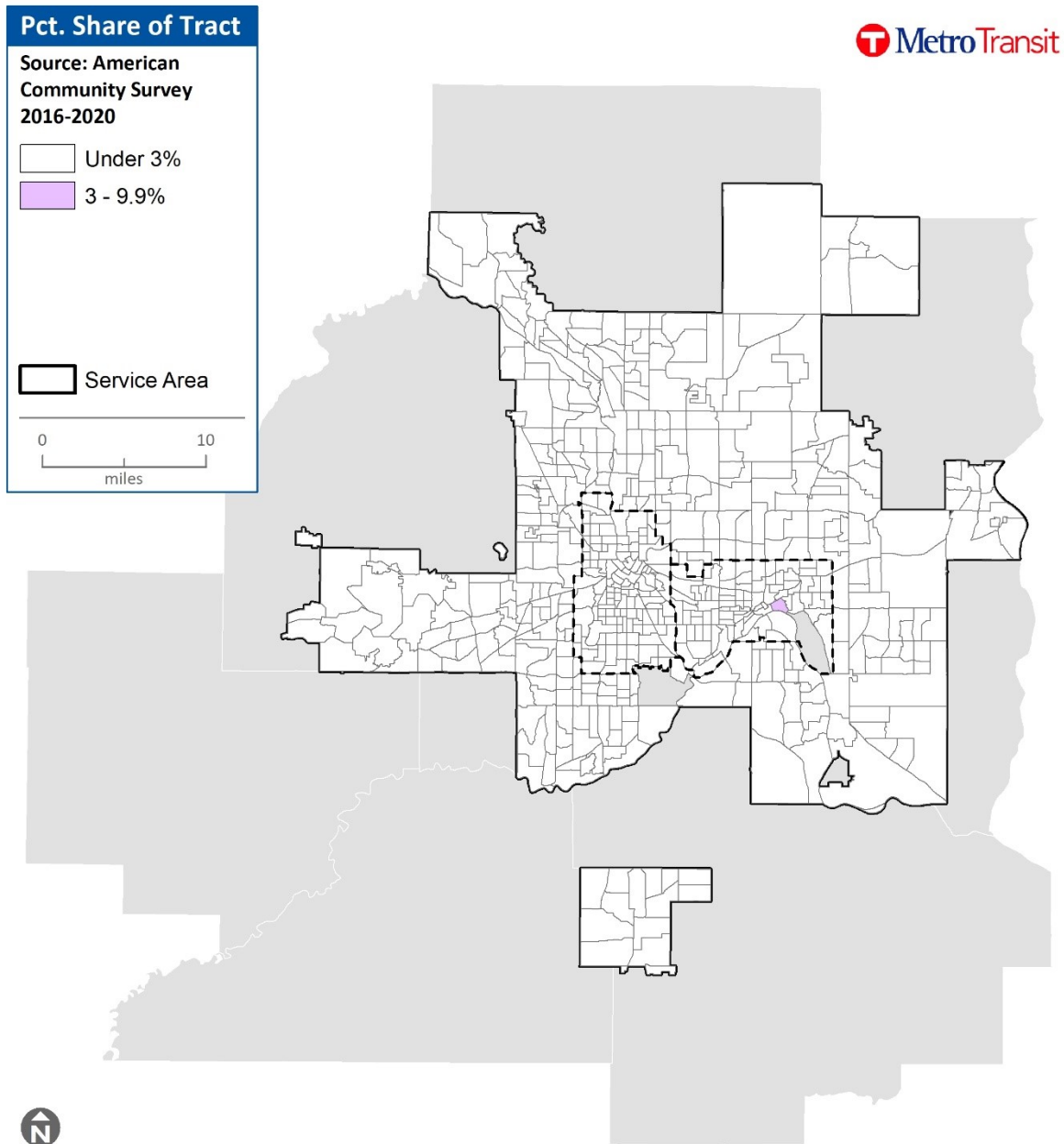
Figure 11 - Distribution of Limited English Proficiency – Korean



***Distribution of Limited English Proficiency (LEP)\*  
Korean Speakers***

\* English spoken less than "very well," ages 5 and older

**Figure 12 - Distribution of Limited English Proficiency – Tagalog**



***Distribution of Limited English Proficiency (LEP)\*  
Tagalog Speakers (includes Filipino)***

\* English spoken less than "very well," ages 5 and older

Additional mapping identifies likely locations where transit service is accessed by LEP speakers of languages *other than* Spanish, “Other Asian and Pacific Island languages,” and “Other or unspecified languages.” For each of the remaining languages or language groups in the ACS with over 1,000 LEP persons (refer to Table 1), residency near transit provides a reasonable expectation of transit interaction among LEP populations. Quarter-mile buffers and half-mile buffers were applied to active bus stops and transitway stations, respectively. Where buffers overlapped with tracts containing populations of at least 3% LEP persons, the LEP population of that tract was considered likely to interact with transit service. Since this analysis is focused on tracts with at least 3% LEP populations, rather than counting all LEP individuals in every tract, evidence of contact with transit service can be attributed to established or emerging community patterns.

To account for significant changes in transit service over the past three years, where bus stops throughout the region became inactive due to service suspensions, this mapping exercise analyzes LEP populations in relation to active stops and stations in March 2020 (pre-pandemic) and March 2022.

To demonstrate the methodology, Figures 13 and 14 show the relationship between LEP population distribution and proximity to transit for Vietnamese speakers. All except one tract with at least 3% LEP persons are near transit, accounting for more than 1,000 Vietnamese LEP speakers living in communities near Metro Transit service, based on both pre-pandemic and current service levels.

Figures 15-20 replicate this methodology for “Other Indo-European languages,” Chinese, and “Russian, Polish, and other Slavic languages.

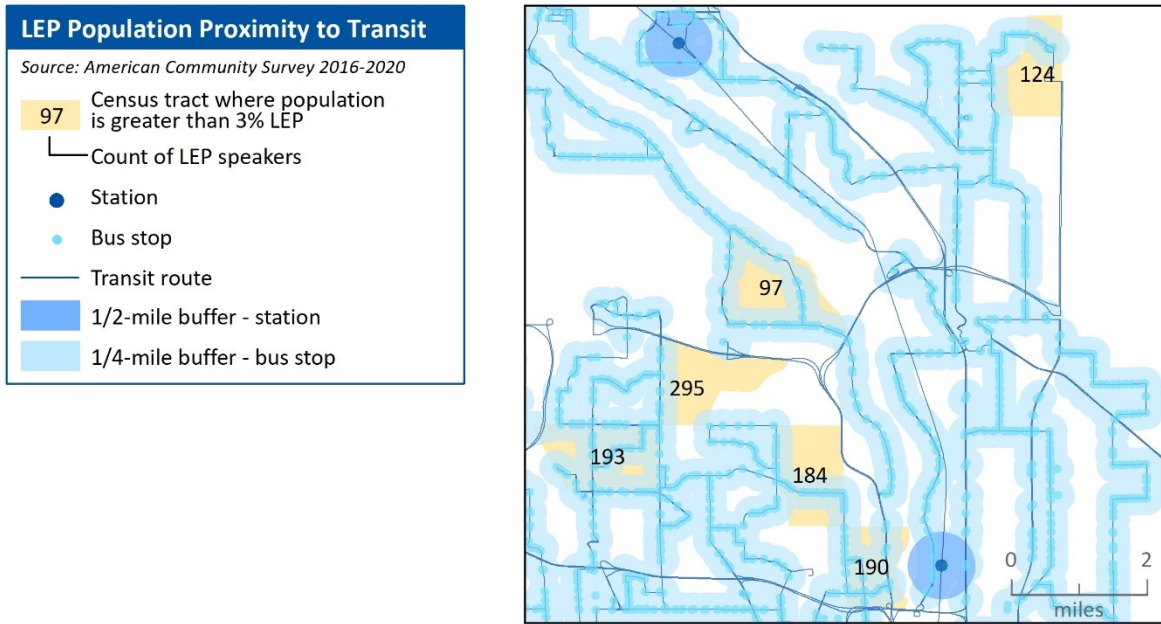
French, Arabic, Korean, and Tagalog each have fewer than 1,000 LEP speakers living in LEP communities near transit service. German is excluded from this analysis because no tracts in the service area exceed a minimum threshold of 3% LEP speakers in the total tract population.

Table 3 lists the number of LEP speakers residing in tracts near transit where those LEP speakers make up over 3% of the tract population:

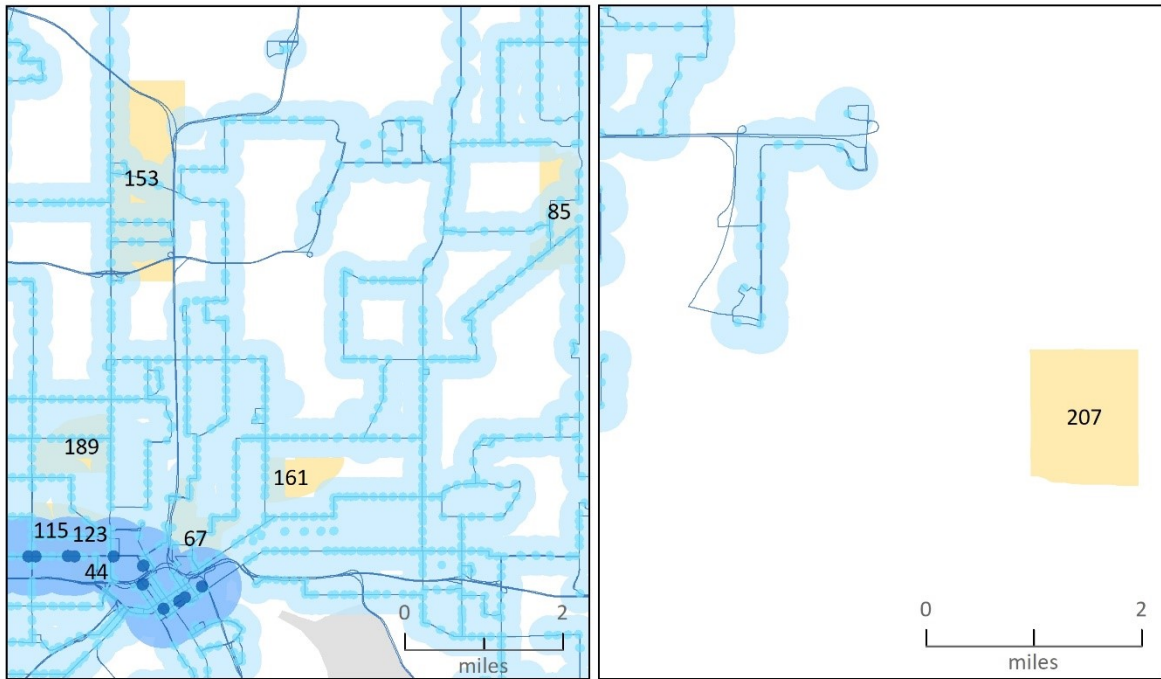
**Table 3: LEP languages and population residing near transit**

| Language                                    | LEP Speakers Residing in Tracts with at least 3% LEP population near Transit |            |
|---|--|------------|
|   | March 2020   | March 2022 |
| Vietnamese                                  | 2,020  | 2,020      |
| Other Indo-European languages               | 1,707  | 1,707      |
| Chinese (incl. Mandarin, Cantonese)         | 2,001  | 2,001      |
| Russian, Polish, and other Slavic languages | 1,725  | 1,605      |
| French (incl. Haitian, Cajun)               | 583  | 583        |
| Arabic                                      | 748  | 748        |
| Korean                                      | 49   | 49         |
| Tagalog (incl. Filipino)                    | 61   | 61         |

**Figure 13 - Distribution of Limited English Proficiency – Vietnamese March 2020**



**Area A: North and northwest metro**



**Area B: Saint Paul and northeast metro**

**Area C: East metro**

**Distribution of Limited English Proficiency (LEP)\*  
 Vietnamese Speakers  
 March 2020 Service**

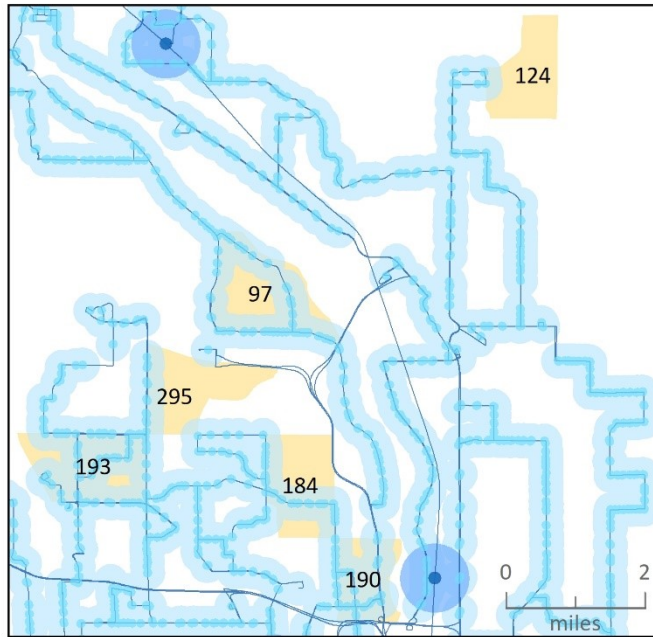


\* English spoken less than "very well," ages 5 and older

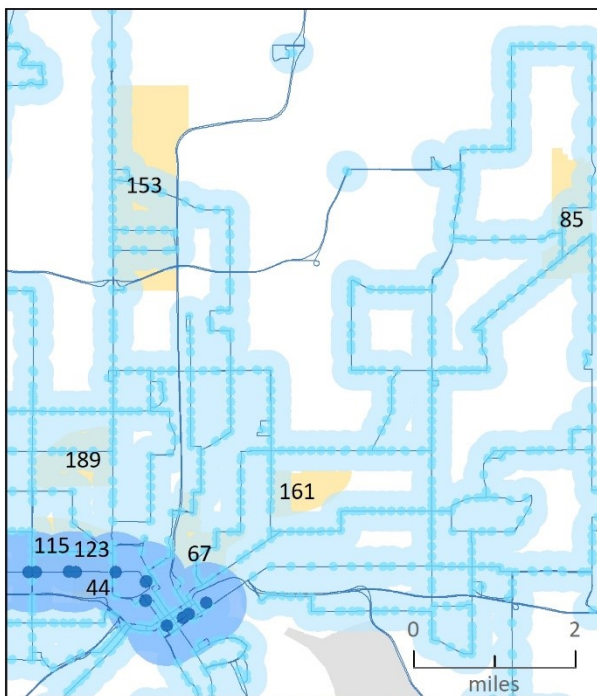
**Figure 14 - Distribution of Limited English Proficiency – Vietnamese March 2022**

**LEP Population Proximity to Transit**  
 Source: American Community Survey 2016-2020

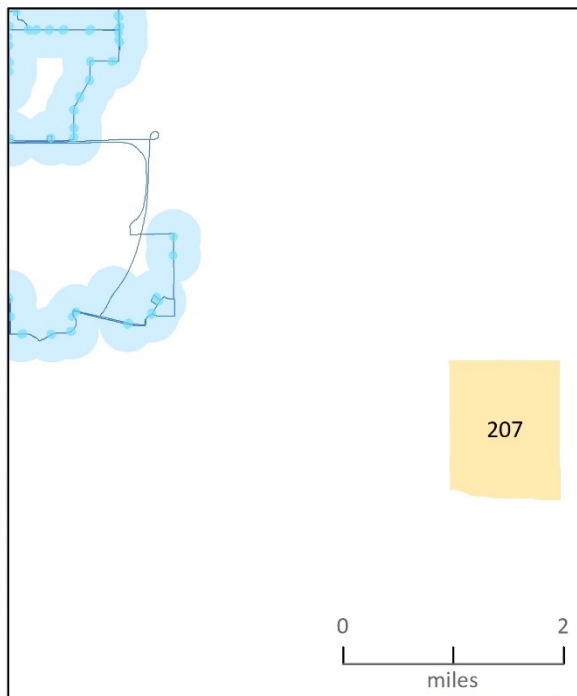
- 97 Census tract where population is greater than 3% LEP
- Count of LEP speakers
- Station
- Bus stop
- Transit route
- 1/2-mile buffer - station
- 1/4-mile buffer - bus stop



**Area A: North and northwest metro**



**Area B: Saint Paul and northeast metro**



**Area C: East metro**

**Distribution of Limited English Proficiency (LEP)\*  
 Vietnamese Speakers  
 March 2022 Service**

\* English spoken less than "very well," ages 5 and older

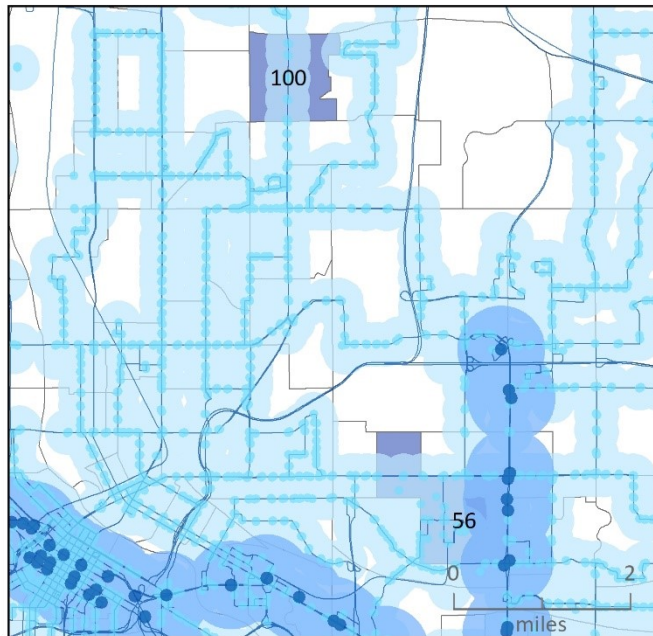


**Figure 15 - Distribution of Limited English Proficiency – Other Indo-European March 2020**

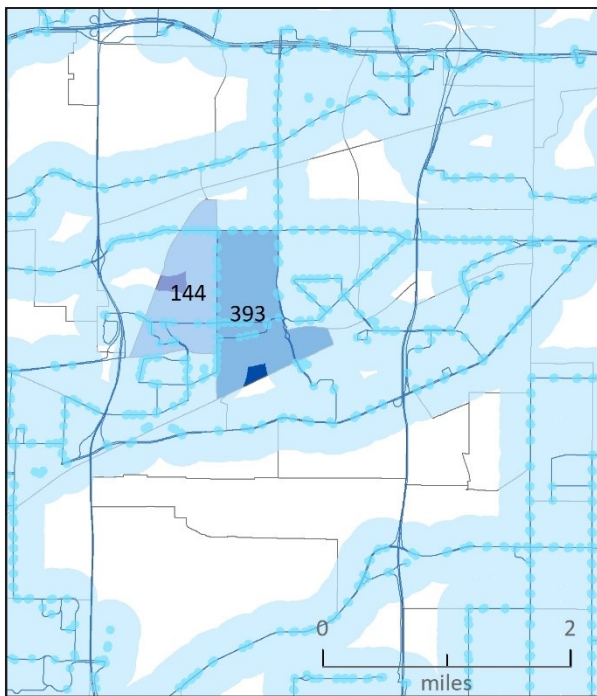
**LEP Population Proximity to Transit**

Source: American Community Survey 2016-2020

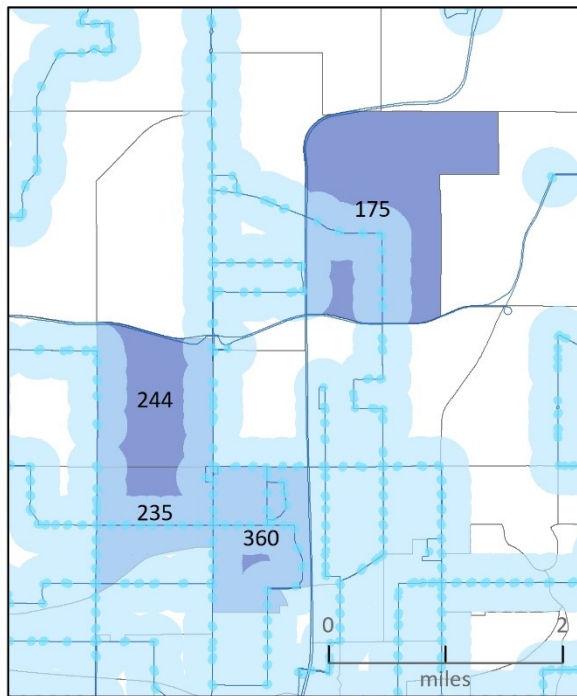
- 97 Census tract where population is greater than 3% LEP
- Count of LEP speakers
- Station
- Bus stop
- Transit route
- 1/2-mile buffer - station
- 1/4-mile buffer - bus stop



**Area A: Minneapolis-Saint Paul and inner suburbs**



**Area B: West metro**



**Area C: Saint Paul and inner suburbs**

**Distribution of Limited English Proficiency (LEP)\*  
Other Indo-European Language Speakers  
March 2020 Service**



\* English spoken less than "very well," ages 5 and older

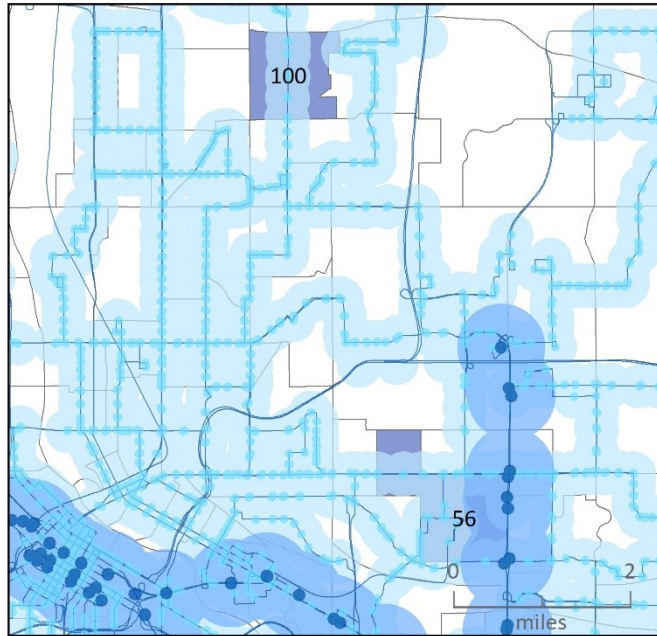


**Figure 16 - Distribution of Limited English Proficiency – Other Indo-European March 2022**

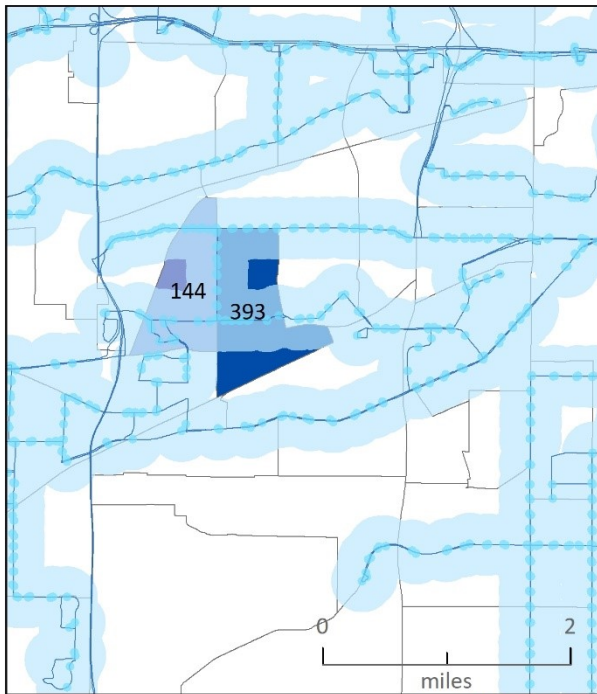
**LEP Population Proximity to Transit**

Source: American Community Survey 2016-2020

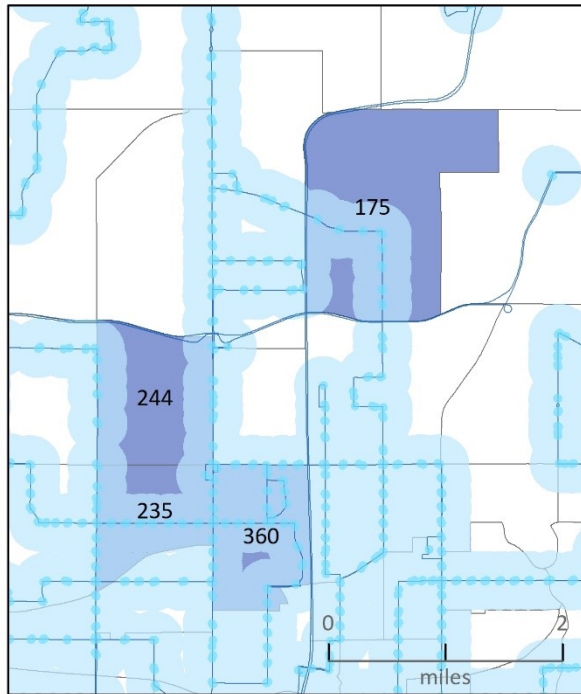
- 97 Census tract where population is greater than 3% LEP
- Count of LEP speakers
- Station
- Bus stop
- Transit route
- 1/2-mile buffer - station
- 1/4-mile buffer - bus stop



**Area A: Minneapolis-Saint Paul and inner suburbs**



**Area B: West metro**



**Area C: Saint Paul and inner suburbs**

**Distribution of Limited English Proficiency (LEP)\*  
Other Indo-European Language Speakers  
March 2022 Service**



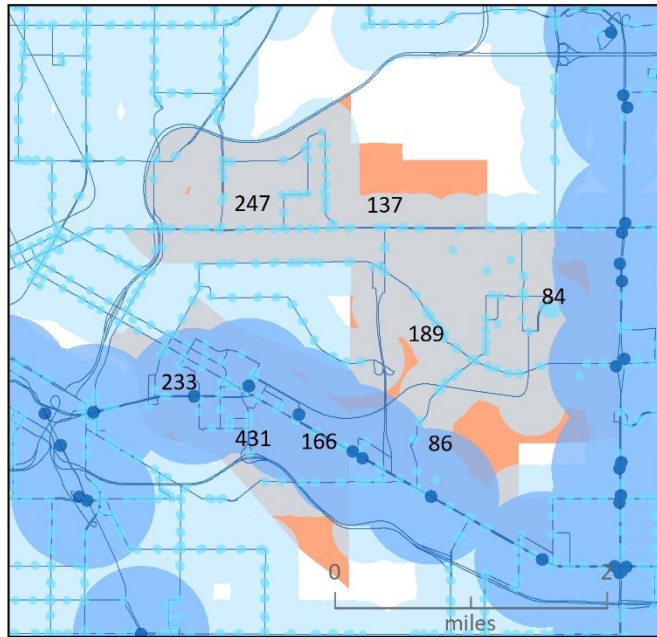
\* English spoken less than "very well," ages 5 and older

**Figure 17 - Distribution of Limited English Proficiency – Chinese March 2020**

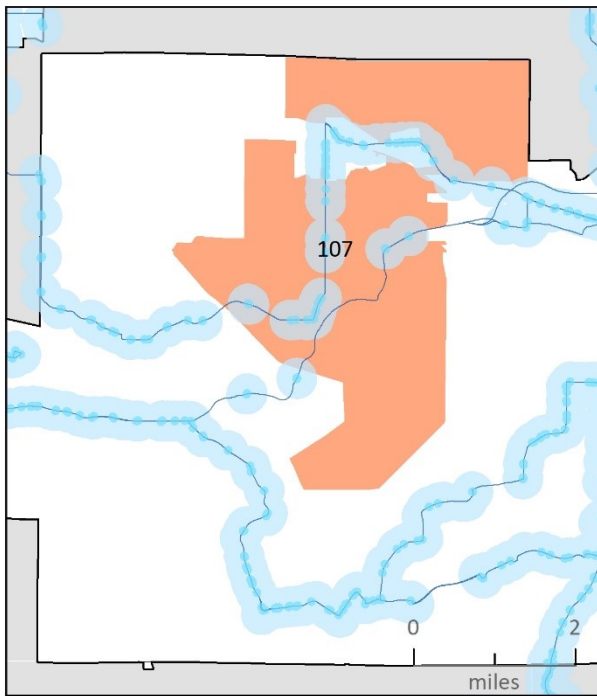
**LEP Population Proximity to Transit**

Source: American Community Survey 2016-2020

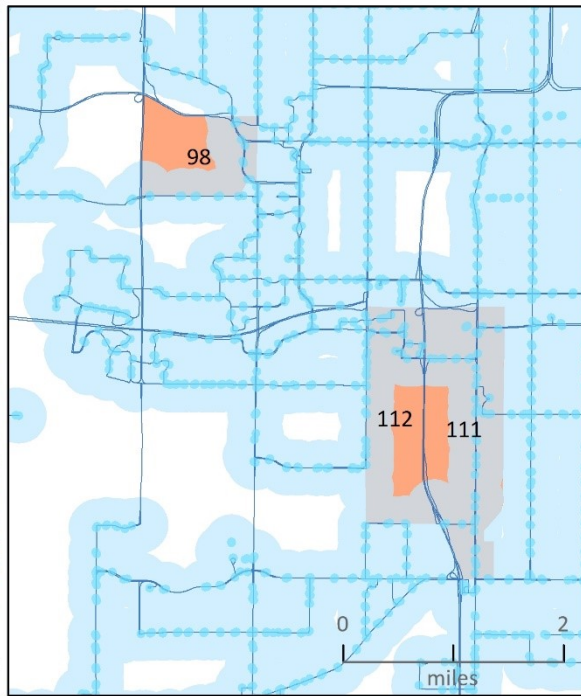
- 97 Census tract where population is greater than 3% LEP
- └─ Count of LEP speakers
- Station
- Bus stop
- Transit route
- 1/2-mile buffer - station
- 1/4-mile buffer - bus stop



**Area A: Minneapolis-Saint Paul**



**Area B: West metro**



**Area C: South metro**

**Distribution of Limited English Proficiency (LEP)\*  
Chinese Speakers (includes Mandarin and Cantonese)  
March 2020 Service**



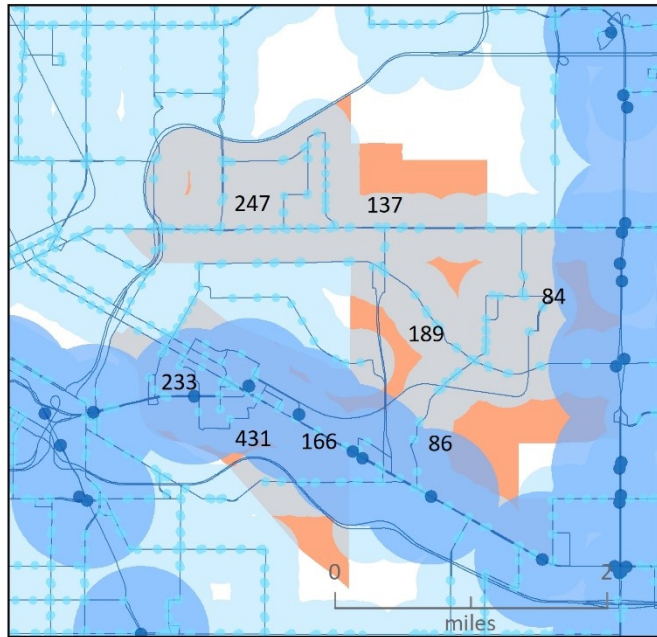
\* English spoken less than "very well," ages 5 and older

**Figure 18 - Distribution of Limited English Proficiency – Chinese March 2022**

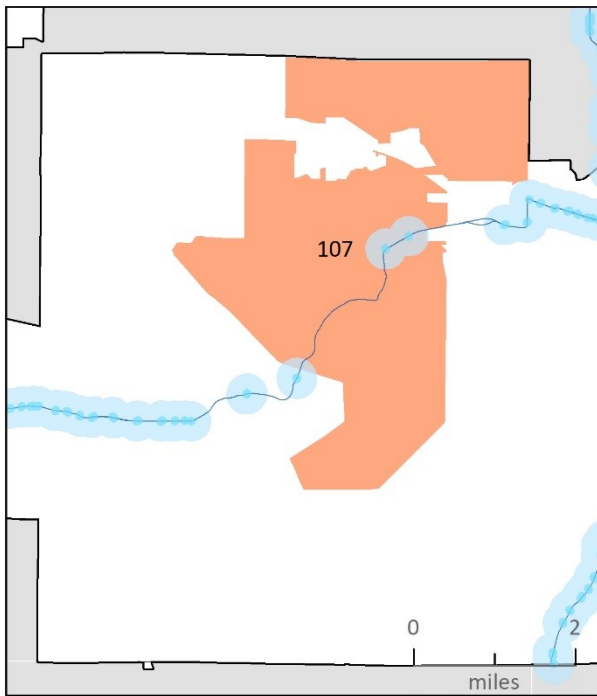
**LEP Population Proximity to Transit**

Source: American Community Survey 2016-2020

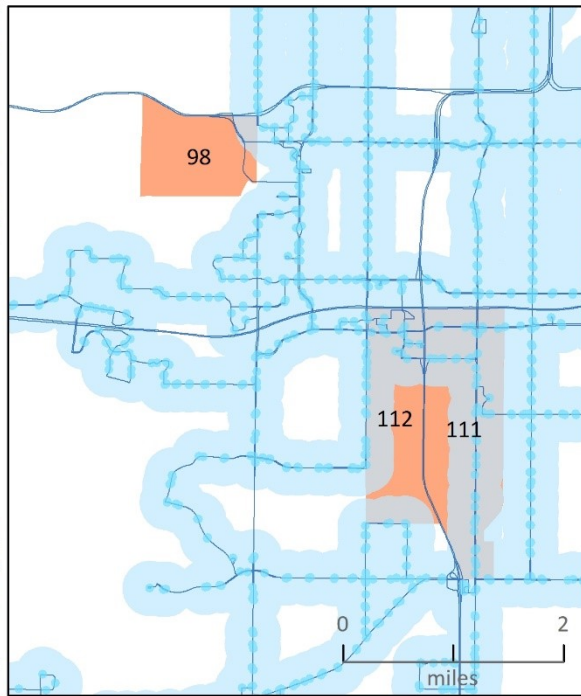
- 97 Census tract where population is greater than 3% LEP
- └─ Count of LEP speakers
- Station
- Bus stop
- Transit route
- 1/2-mile buffer - station
- 1/4-mile buffer - bus stop



**Area A: Minneapolis-Saint Paul**



**Area B: West metro**



**Area C: South metro**

**Distribution of Limited English Proficiency (LEP)\*  
Chinese Speakers (includes Mandarin and Cantonese)  
March 2022 Service**



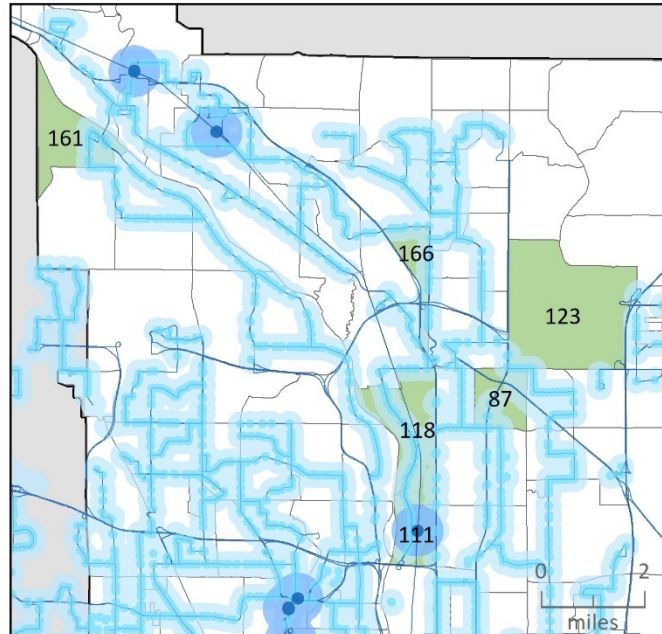
\* English spoken less than "very well," ages 5 and older

**Figure 19 - Distribution of Limited English Proficiency – Russian, Polish, other – March 2020**

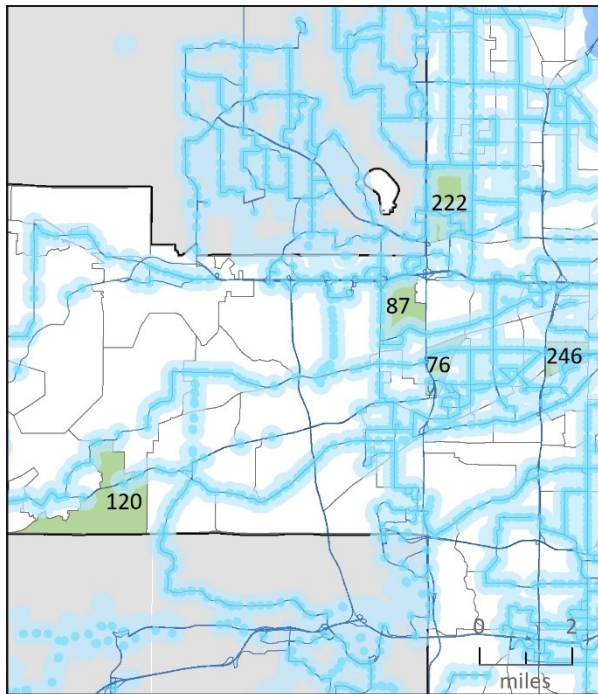
**LEP Population Proximity to Transit**

Source: American Community Survey 2016-2020

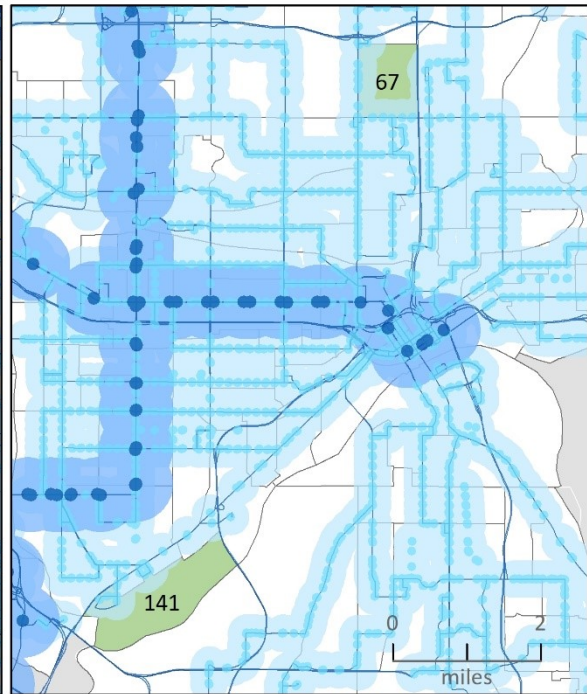
- 97 Census tract where population is greater than 3% LEP
- Count of LEP speakers
- Station
- Bus stop
- Transit route
- 1/2-mile buffer - station
- 1/4-mile buffer - bus stop



**Area A: North and northwest metro**



**Area B: West metro**



**Area C: Saint Paul and inner suburbs**

**Distribution of Limited English Proficiency (LEP)\*  
Russian, Polish, and Other Slavic Language Speakers  
March 2020 Service**

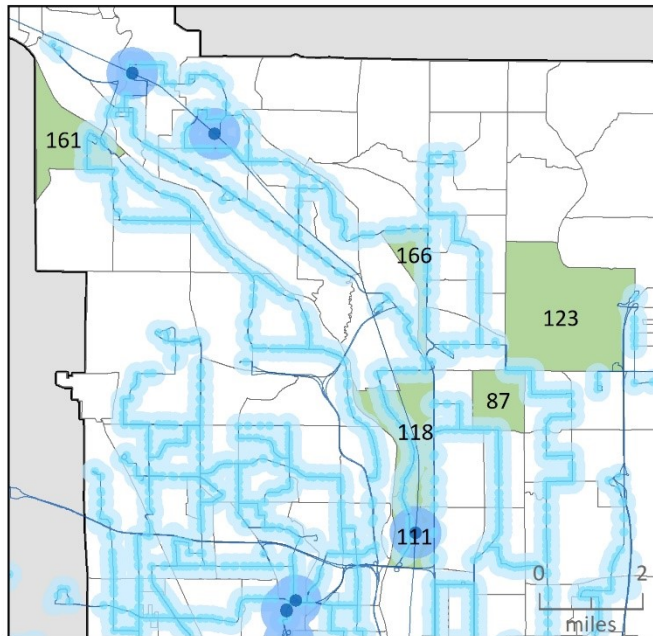


\* English spoken less than "very well," ages 5 and older

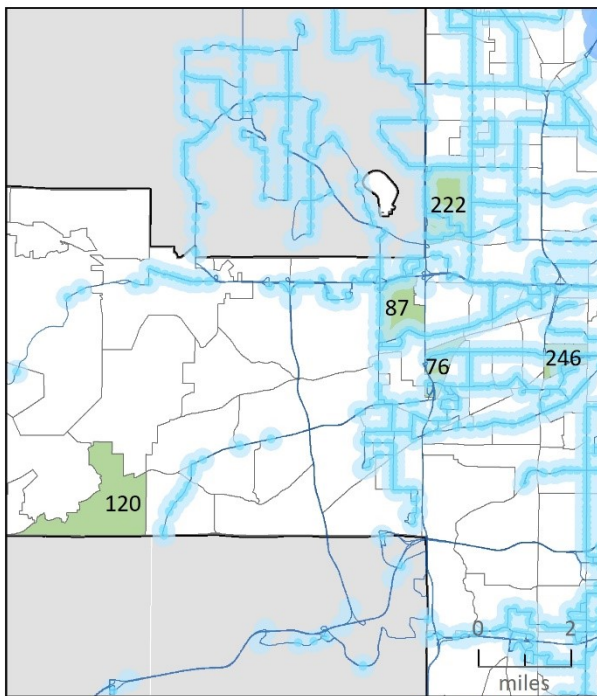
**Figure 20 - Distribution of Limited English Proficiency – Russian, Polish, other – March 2022**

**LEP Population Proximity to Transit**  
 Source: American Community Survey 2016-2020

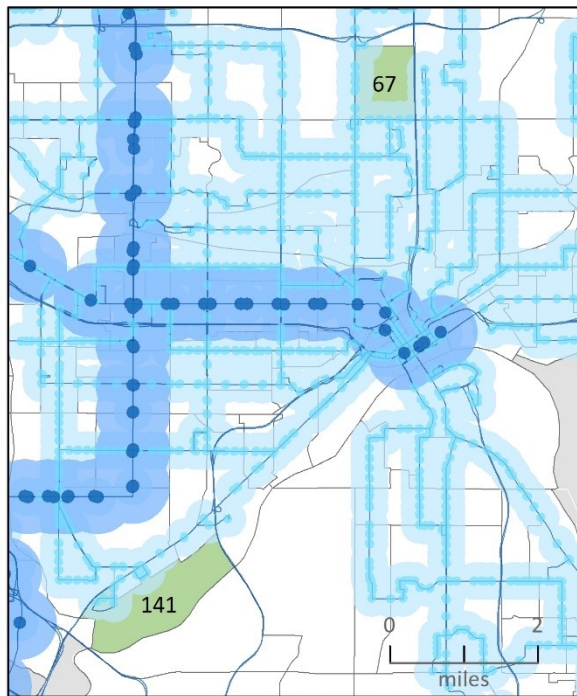
- 97 Census tract where population is greater than 3% LEP
- Count of LEP speakers
- Station
- Bus stop
- Transit route
- 1/2-mile buffer - station
- 1/4-mile buffer - bus stop



**Area A: North and northwest metro**



**Area B: West metro**



**Area C: Saint Paul and inner suburbs**

**Distribution of Limited English Proficiency (LEP)\*  
 Russian, Polish, and Other Slavic Language Speakers  
 March 2022 Service**



\* English spoken less than "very well," ages 5 and older

## Contact Center Data

Metro Transit Call Center support the conclusion that Metro Transit interacts most commonly with individuals who primarily speak Spanish, Somali, and Russian. For example, between June 2019-February 2022, the Call Center took 2177 calls from customers seeking interpreter services. The breakdown is listed below:

| Language     | Number of Calls |
|--------------|-----------------|
| Spanish      | 1726            |
| Somali       | 210             |
| Russian      | 130             |
| Hmong        | 20              |
| Amharic      | 15              |
| French       | 13              |
| Vietnamese   | 11              |
| Arabic       | 9               |
| Farsi        | 8               |
| Oromo        | 7               |
| Swahili      | 6               |
| Bengali      | 3               |
| Kurmanji     | 3               |
| Mandarin     | 3               |
| Thai         | 2               |
| Tigrigna     | 2               |
| Japanese     | 2               |
| Burmese      | 2               |
| Khmer        | 1               |
| Karen        | 1               |
| Korean       | 1               |
| Laotian      | 1               |
| Portuguese   | 1               |
| <b>Total</b> | <b>2177</b>     |

## Supplemental Information

Metro Transit reached out to several groups to learn more about which languages are spoken most often in the Twin Cities.

- In the first three quarters of 2021, Ramsey County Human Services reported 10,136 requests for interpretation. Four languages each comprised at least 5% of total requests and together accounted for 98% of all requests: Somali (38%), Karen (32%), Hmong (22%), and Spanish (6%). Burmese, Oromo, and Amharic were each a small portion (1% or less) of interpreter requests. No other languages besides English were reported in this period.
- Between May 2021 and April 2022, Hennepin County Human Services reported 818,767 minutes of telephonic translation requests through Language Line. Three languages each comprised at least 5% of total requests and together accounted for 89% of all requests: Spanish (44%), Somali (39%), and Hmong (6%). Oromo, Amharic, and Russian were each a small portion (1-2%) of translated minutes. Sixty-four other languages comprised the remaining 6% of translated minutes.
- The International Institute of Minnesota is among the leading providers of English language classes in the region. They reported 396 students enrolled in English classes in 2021. Five languages each comprise at least 5% of enrollment: Spanish (12%), Somali (12%), Amharic (9%), Oromo (5%), and French (5%). Forty-six other languages (including English) are reported among enrolled students.

## Metro Mobility

Metro Mobility management and staff report that contact with LEP persons is very infrequent. Staff reported that they rarely (less than ten times per month) need to use Language Line with potential customers. Metro Mobility provides interpreter and translation services upon request. Over the past year, Metro Mobility staff reported that the department utilized interpreters to assist clients with the intake interview process approximately once per month. However, three quarters of those interactions involve using American Sign Language interpreters.

Call Center staff use Language Line to facilitate interactions with Customers with limited English proficiency that speak a language other than English or Spanish.

## Nature and Importance of Transportation Services for Customers with limited English proficiency

Many persons who speak a primarily language other than English rely on public transportation for their mobility needs. According to U.S. Department of Transportation LEP guidance, “providing public transportation access to LEP persons is crucial. An LEP person’s inability to utilize effectively public transportation may adversely affect his or her ability to obtain health care, education, or access to employment.”

Metro Transit is committed to translating vital documents into languages where there is sufficient evidence that at least 1,000 LEP individuals are likely to interact with Metro Transit services. Based on ACS data corroborated by public school EL enrollment, these languages are Spanish, Hmong, Somali, and Karen.

A secondary analysis revealed communities where collectively over 1,000 LEP Vietnamese speakers live near transit. These communities are dispersed throughout the service area, primarily in the suburbs but also in Saint Paul. LEP Vietnamese speakers are represented in data from K-12 public schools (364 EL students), IIMN (2% of enrollment), Hennepin County (1% of all minutes), and the

Metro Transit Call Center (11 calls).

This analysis also identified communities near transit where over 1,000 LEP persons speak “Other Indo-European languages.” These communities are primarily in the suburbs but also in Saint Paul. This language group consists of numerous languages, including Nepali, Pashto, Dari, Bengali, Kurmanji, and Farsi, which are all languages spoken in the region. However, each language comprises a relatively small portion of English learners at public schools (251 or fewer EL students), IIMN enrollement (2% or less of EL students), Hennepin County telephonic translations (0.52% or less of total minutes), and Metro Transit Call Center translations (3-8 calls).

Over 1,000 LEP Chinese speakers live in communities near transit, primarily near the University of Minnesota’s Minneapolis and Saint Paul campuses. International students enrolled at these institutions may not consider themselves to speak English “very well,” but they are required to demonstrate command of the English language to be admitted. To a lesser degree, LEP Chinese speaking communities also reside in the suburbs. Mandarin is the most prevalent Chinese language spoken in the service area, and LEP speakers are represented at public schools (211 EL students), at IIMN (2% of enrollment), among Hennepin County telephonic translations (0.21% of total minutes), and among Metro Transit Call Center translations (3 calls).

Similarly, over 1,000 LEP speakers of Russian, Polish, and other Slavic languages reside in communities near transit. These communities are almost entirely suburban, besides one tract in Saint Paul. Within this language classification, Russian is most prevalent in the service area. LEP Russian speakers are represented in public schools (109 EL students), at IIMN (1% of enrollment), among Hennepin County telephonic translations (1% of total minutes), and among Metro Transit Call Center translation requests (130 calls).

There is demonstrable evidence that at least 1,000 LEP Vietnamese speakers interact with Metro Transit services and would benefit from vital document translation. Among the various languages analyzed, Vietnamese is the only singular language where LEP communities clearly exceed the 1,000-person threshold near transit.

Primarily due to the limitations of ACS data that aggregates multiple languages, and secondarily due to lower EL student enrollments, there is insufficient evidence to demonstrate that over 1,000 LEP persons speaking languages of Mandarin, Russian, and other Indo-European languages interact with Metro Transit services. To translate vital documents in these languages would not likely constitute a significant enhancement to service access.

Review of smaller LEP communities do not show more than 1,000 LEP persons living near transit that speak French, Arabic, Korean, or Tagalog. Data collected from other supplemental sources provide further evidence that vital document translation for these languages would not meaningfully enhance access to service.

Therefore, vital documents will be translated into Spanish, Hmong, Karen, Somali, and Vietnamese. There are no plans to translate vital documents into other languages. However, translation of transit route-level materials will be considered as appropriate.

## **Resources Available & the Costs of Providing Language Assistance Services**

The principal resources available to the Council’s Transportation services for providing language



assistance to Customers with limited English proficiency are Metro Transit's website, fare machines located at various transit centers, its customer service phone lines, translated materials, and its Customer Advocate program.

## Metro Transit Website

Metro Transit provides translated content in Spanish, Somali, Hmong, Vietnamese and Karen at [metrotransit.org/languages](http://metrotransit.org/languages). Each language sub-page contains translated information that directs users to Language Line resources, gives how-to-ride details, provides fare information, contains information about the Title IV complaint process and has links to vital documents. Google Translate is available to translate other pages of the Metro Transitsite.

## Fare Machines

Fare machines on Blue and Green Light Rail Line stations offer customers the option of selecting Spanish, Hmong, or Somali (the three most commonly used languages besides English) for purchasing fares.

## Interpretation Services

Metro Transit's Call Center staff uses Language Line to facilitate phone interactions with Customers with limited English proficiency. Language Line can provide language interpretation services for over 240 different languages. Recently, a text to transit information option was added and that feature offers a translation option that supports 60 languages. In addition, Metro Transit also offers, upon request, interpreters for community meetings.

## Translated Materials

Metro Transit provides documents and information that are translated into Hmong, Spanish, Somali, Vietnamese and Karen. These documents include fare product, user guides, safety brochures, translated page referral cards, etc. Metro Transit has also provided translated direct mailings in other languages like Nepali— for specific groups which may be impacted by changes to particular routes. Metro Transit also offers translations of documents upon request. Please see Attachments for samples of translated documents.

Transit Information led usability testing in 2015-2016 that included interviews with LEP participants to evaluate the usability of Metro Transit information materials. These materials included Rider Alerts, shelter schedules, pocket schedules, and bus stop signs. The interview results informed the redesign of transit information materials.

Metro Transit also incorporates Universal Design principles into transit information to improve access for LEP persons and those without first-language literacy. Where materials are less suitable for translation (e.g. bus stop signs), materials are designed to reduce text to plain English and convey information through icons and images.

## Outreach Coordinators

Metro Transit Outreach Coordinators provide free presentations and personalized how-to-ride classes addressing topics such as: fares and how to pay them, trip planning, reading maps and schedules, using the Metro Transit website, accessibility, etc. This is a customizable training that is adapted to meet the needs of a range of unique customer groups including populations with limited English proficiency. Metro Transit helps make these workshops linguistically accessible to Populations with limited English proficiency by partnering with the requesting community group, which often provides interpretation services.

These services involve several technological and personnel costs, which are distributed among Metro Transit's operations. Metro Transit is committed to assuring that these and other resources are used to reduce the barriers that limit access to its information and services by populations with limited English proficiency. Where applicable, Metro Transit will provide funds to enhance its language services.

## Current Language Assistance Measures

**DOT Guidance:** "An effective LEP plan would likely include information about the ways in which language assistance will be provided.

Based on the four-factor analysis above, the most predominant languages spoken by LEP persons in the Metro Transit, Metro Mobility, and Transit Link services areas are Spanish, Hmong, Somali, Vietnamese, and Karen. The Council most frequently encounters Spanish speaking commuters. In addition, Metro Transit is the Council's most widely used transportation service. As a result, the Council focuses the majority of its LEP resources on Metro Transit and provides its most robust language assistance services in Spanish primarily, followed by Hmong, Somali, Vietnamese, and Karen. However, the Council continues to make language assistance for other languages available on an as-needed basis.

Metro Transit uses a variety of strategies to provide language assistance for Customers with limited English proficiency, including:

- A variety of translated materials, including Title VI Notice of Rights, Title VI complaint forms, application and intake forms for reduced fare programs, fare information and user guides, notices of the availability of interpretation services and various marketing materials. Please see Attachment 2s for samples of translated materials.
- Ticket Vending Machines (TVMs) that offer customers the option of selecting Spanish, Hmong, or Somali translations for purchasing fares.
- Language Line phone services to facilitate interactions between Customers with limited English proficiency and Metro Transit customer service staff. Language Line can provide language interpretation services for over 240 different languages.
- Interactive Voice Response (IVR) system offers automated messages in Spanish to Customers with limited English proficiency calling Metro Transit's general phone line for transit trip information and Go-To card services.
- Translations, available upon request, of all public documents and meeting materials presented at community/outreach meetings.
- Interpreters, available upon request, for community/outreach meetings.
- Outreach and educational workshops by Metro Transit Outreach Coordinators offering personalized and linguistically accessible how-to-ride classes to groups throughout Metro Transit's service area.
- A website that contains a subsection of basic how-to-ride content translated into Spanish, Somali, Hmong, Vietnamese, and Karen.
- Monitoring staff interactions with Customers with limited English proficiency in order to identify

potential areas of need for language assistance.

- Advertising its services via radio and television to communities that speak languages other than English.
- Metro Mobility uses several strategies to provide language assistance for Customers with limited English proficiency, including:

## Current LEP Outreach

### Metro Transit Webpage

Metro Transit provides translated content in Spanish, Somali, Hmong, Vietnamese, and Karen at [metrotransit.org/languages](https://metrotransit.org/languages). Each language sub-page contains translated information that directs users to Language Line resources, gives how-to-ride details, provides fare information, contains information about the Title IV complaint process and has links to vital documents. This section also has a Google Translate feature to assist speakers of other languages.

Similarly, basic translated content is available for Metro Mobility users at [metromobility.org/translations](https://metromobility.org/translations) and for Transit Link at [transitlinktc.org/translations](https://transitlinktc.org/translations).

### Language Line

The public, including Customers with limited English proficiency, can contact Metro Transit's Call Center. Metro Transit utilizes Language Line to provide phone interpreters for Customers with limited English proficiency who wish to speak with a Call Center representative. Language Line provides interpretation services in over 240 languages.

### Advertising with Multilingual Media

Metro Transit has also advertised its services with multilingual media. For example, Metro Transit produced translated print, bus, and radio and TV ads promoting transit information; Spanish radio promoting operator hiring; and translated posters communicating the role of Metro Transit police officers. In 2021 Metro Transit entered into year-long contracts with nine ethnic and multilingual media for the to provide regular in language advertising

### Outreach Coordinators

Metro Transit Outreach Coordinators provide free presentations and personalized how-to-ride classes to groups throughout Metro Transit's service area. During these classes, Outreach Coordinators teach groups several things including:

- Fares and how to pay them
- Planning a trip
- Reading maps and schedules
- Transfers / Using Park & Ride lots
- [Metrotransit.org](https://metrotransit.org) and online tools
- Accessibility
- Safety
- Mock calls to practice using Language Line
- Other topics

In addition to these presentation topics, Outreach Coordinators often bring a Metro Transit bus to the

meeting site and have the group practice buying their fare, requesting a transfer, finding their seat, using the pull-cord signaling system, and taking a practice ride where they learn to identify bus stops. Outreach Coordinators also hold classes on light rail vehicles where customers experience a trip and learn about safety and the various amenities available on each rail car.

This training can be customized to address specific issues and can be adapted to meet the needs of job seekers, those with disabilities, English language learner (ELL)/populations with limited English proficiency, seniors, community groups and schools of all ages. Metro Transit helps make these workshops linguistically accessible through a variety of strategies. For example, one of the Outreach Coordinators is a native Spanish speaker. In addition, Outreach Coordinators partner with the requesting community group, which provides interpretation services.

Metro Transit Outreach Coordinators have a broad network of partner organizations that extends to approximately 90 organizations that each serve English language learners. This network is constantly growing as more partnerships are established.

Since the last Title VI update, Metro Transit's Outreach Coordinators provided trainings to over 40 groups that serve Customers with limited English proficiency. In total, our Outreach Coordinators estimate that they have reached hundreds of Customers with limited English proficiency through this outreach.

## Rider Surveys

Metro Transit translates all rider surveys into Spanish and uses a call-back feature to connect survey respondents of other languages with a Language Line representative.

## Future Strategies to Better Serve Customers with limited English proficiency

The Office of Equity and Equal Opportunity (OEEO) will continue to lead LEP initiatives for the Council to better coordinate how Metro Transit, Metro Mobility, and Transit Link serve their customers with limited English proficiency. In addition, OEEO will continue collaborating with sub-recipients to ensure they comply with Title VI and LEP.

OEEO has helped coordinate several working groups, consisting of various Council and Metro Transit staff. These groups help explore options, resources, and opportunities for complying with Title VI. The Council's continuing LEP efforts will include the following:

1. Metro Transit will be implementing direct response interpretation services for Limited English Proficiency (LEP) customers wishing to speak to a Metro Transit's Transit Information or Customer Relations representatives through its main number 612-373-3333. This service allows customers to select their preferred language at the start of their call and connect directly with an interpreter to assist with their call. The following languages will be supported:
  - Spanish
  - Somali
  - Russian
  - Hmong
  - Vietnamese
  - Karen

Customers seeking support in other languages can still utilize interpretation services by connecting with Transit Information or Customer Relations Rep and requesting an interpreter.

2. Metro Transit will also be exploring the potential of adding Vietnamese, Hmong, and Russian to its NexTrip and Go-To Car automated phone line.

## **Staff Training**

According to LEP guidance provided by the USDOT, “Staff members should know their obligations to provide meaningful access to information and services for LEP persons, and all employees in public contact positions should be properly trained.”

Metro Transit and Metro Mobility provide basic training for employees at their respective Contact Centers for utilizing the services of Language Line to help facilitate meaningful interactions with Customers with limited English proficiency. In addition, Metro Transit and OEO developed language classes for various public-facing personnel. These include Transit-related Spanish language classes for bus operators that drive through Spanish speaking areas of the region. Language classes were held from 2015 to 2017, but they were discontinued due to scheduling and attendance challenges.

Soon, Metro Transit Contact Center staff will be provided a training on demographic trends in the Metro Transit service area, as well as individual training for staff on customer service while providing language assistance.

Current efforts are underway to implement language classes in an online format. Furthermore, Metro Transit Police has offered Spanish classes to Police Officers in the past to help them interact with Spanish speaking customers. These courses were expanded to include Somali instruction for Police Officers, and Spanish courses for operators in additional locations. Additional LEP training is given to employees on a case-by-case basis based on employee, supervisor, and customer feedback.

## **Monitoring & Updated the Language Assistance Plan**

The Council conducts internal monitoring of its language assistance practices ensuring that the strategies employed remain effective. This is accomplished partially through feedback from Metro Transit, Metro Mobility, and Transit Link Call Center staff and from Metro Transit bus operators who help identify the Populations with limited English proficiency with whom they come in frequent contact.

The Council is committed to continuously improving its Language Assistance Plan. To that end, the agency will revise the plan with more appropriate strategies as needed. Additionally, the Council, Metro Transit, Metro Mobility, and Transit Link will assess the viability and cost- effectiveness of pursuing and implementing new technologies and language assistance strategies as they become available