
LIMITED ENGLISH PROFICIENCY PLAN

MACATAWA AREA EXPRESS
TRANSPORTATION AUTHORITY

FY 2010

Introduction

On August 11, 2000, the President signed Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency." The Executive Order requires Federal agencies to examine the services they provide, identify any need for services to those with limited English proficiency (LEP), and develop and implement a system to provide those services so LEP persons can have meaningful access to them. It is expected that agency plans will provide for such meaningful access consistent with, and without unduly burdening, the fundamental mission of the agency. The Executive Order also requires that the Federal agencies work to ensure that recipients of Federal financial assistance provide meaningful access to their LEP applicants and beneficiaries.

Executive Order 13166 applies to all federal agencies and all programs and operations of entities that receive funding from the federal government, including state agencies, local agencies and governments, private and non-profit entities, and sub-recipients.

Federally assisted recipients are required to make reasonable efforts to provide language assistance to ensure meaningful access for LEP persons to the recipient's programs and activities. To do this, the recipient should:

1. Conduct the four-factor analysis.
2. Develop a Language Access Plan (LAP).
3. Provide appropriate language assistance.

The actions that the recipient may be expected to take to meet its LEP obligations depend upon the results of the four factor analysis including the services the recipient offers, the community the recipient serves, the resources the recipient possesses, and the costs of various language service options. All organizations would ensure nondiscrimination by taking reasonable steps to ensure meaningful access for persons who are LEP.

As part of its Title VI update, the Macatawa Area Express Transportation Authority (MAX) has developed the following Limited English Proficiency Plan. The plan's contents are consistent with the guidance on an effective language implementation plan expressed in Section VII of the U.S. Department of Transportation's Policy Guidance Concerning Recipients' responsibilities to Limited English Proficient (LEP) Persons [Federal Register: December 14, 2005] (Volume 70, Number 239).

The following plan explains to the transit agency staff the need to undertake language assistance activities including the following activities that are recommended in the DOT LEP Guidance on an implementation plan.

The U.S. Department of Justice, Civil Rights Division has developed a set of elements that may be helpful in designing an LEP policy or plan. These elements include:

1. Identifying LEP individuals who need language assistance.
2. Providing language assistance measures.
3. Training staff.
4. Providing notice to LEP persons of the availability of language assistance.
5. Monitoring and updating the LEP plan.

This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, the training of staff, how to notify LEP persons that assistance is available, and information for future plan updates.

Four Factor Analysis

The DOT guidance outlines four factors recipients should apply to the various kinds of contacts they have with the public to assess language needs and decide what reasonable steps they should take to ensure meaningful access for LEP persons:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.
2. The frequency with which LEP individuals come in contact with the program.
3. The nature and importance of the program, activity, or service provided by the recipient to the LEP Community.
4. The resources available to the recipient and the overall cost.

The greater the number or proportion of eligible LEP persons; the greater the frequency with which they have contact with a program, activity, or service; and the greater the importance of that program, activity, or service, the more likely enhanced language services will be needed. Smaller recipients with more limited budgets are typically not expected to provide the same level of language service as larger recipients with larger budgets. The intent of DOT's guidance is to suggest a balance that ensures meaningful access by LEP persons to critical services while not imposing undue burdens on small organizations and local governments.

After completing the above four-factor analysis, recipients can determine the appropriate "mix" of LEP services required. Recipients have two main ways to provide language services: oral interpretation either in person or via telephone interpretation service and written translation. The correct mix should be based on what is both necessary and reasonable in light of the four-factor analysis. For instance, a motor vehicle department or an emergency hazardous material cleanup team in a largely Hispanic neighborhood may need immediate oral interpreters available and decide to hire full-time bilingual staff. In contrast, there may be circumstances where the importance and nature of the activity and number or proportion and

frequency of contact with LEP persons may be low and the costs and resources needed to provide language services may be high in which pre-arranged language services for the particular service may not be necessary. The languages spoken by the LEP individuals with whom the recipient has frequent contact often determine the languages into which documents will need to be translated and the types of interpreters that can be provided.

More detail on the points discussed above and information on other considerations are found in the Department of Transportation issued Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons, Federal Register: December 14, 2005 (Volume 70, Number 239).

Factor 1: The Proportion, Number, and Distribution of LEP Persons

The U.S. Census Bureau has a range of four classifications of how well persons speak English. The classifications used are "very well," "well," "not very well," and "not at all." For the MAX Transit's planning purposes, we are considering people that speak English less than "very well" as Limited English Proficient persons.

Table 1: Population 5 Years Old & Older Speaking a Language Other than English at Home.

	Population 5 years old & older	Speak a Language Other than English at Home	Percent Speaking a Language Other than English at Home
Holland, City of	30,050	6,960	23.2%
Holland Charter Twp.	29,609	7,495	25.3%
Zeeland, City of	5,475	259	4.7%

Of the 65,134 people 5 years old and older within the Macatawa Area Express service area (covering of portions of Ottawa and Allegan Counties), 16.0% speak Spanish at home; 1.9% of people speak an Indo-European language at home, such as Armenian, Bengali, French, German, Russian, Swedish, and others; 4.6% speak an Asian & Pacific Island language at home, such as Chinese, Japanese, Korean, Laotian, Vietnamese, and others.

Figures 1 and 2 (shown on pages 4 and 5, respectively) represent the distribution of Limited English Proficiency individuals across the MAX Transit service areas of Southwestern Ottawa County and extreme Northwestern Allegan County.

Table 2: Among the Languages Spoken at Home, the Proportion of Population 5 Years Old or Older Speaking English Less Than “Very Well.”

	Spanish, speaking English less than “very well.”	Other Indo-European, speaking English less than “very well.”	Asian & Pacific Islander, speaking English less than “very well.”
Holland, City of	8.8%	0.9%	1.3%
Holland Charter Twp.	6.8%	0.2%	5.5%
Zeeland, City of	0.5%	0.1%	0.4%

Figure 1: Limited English Proficiency Population Map/Southwestern Ottawa County

Percent of Persons 5 Years and Over Who Speak a Language Other than English at Home
by Census Block Group
Southwestern Ottawa County, Michigan
(Source: U.S. Census Bureau)

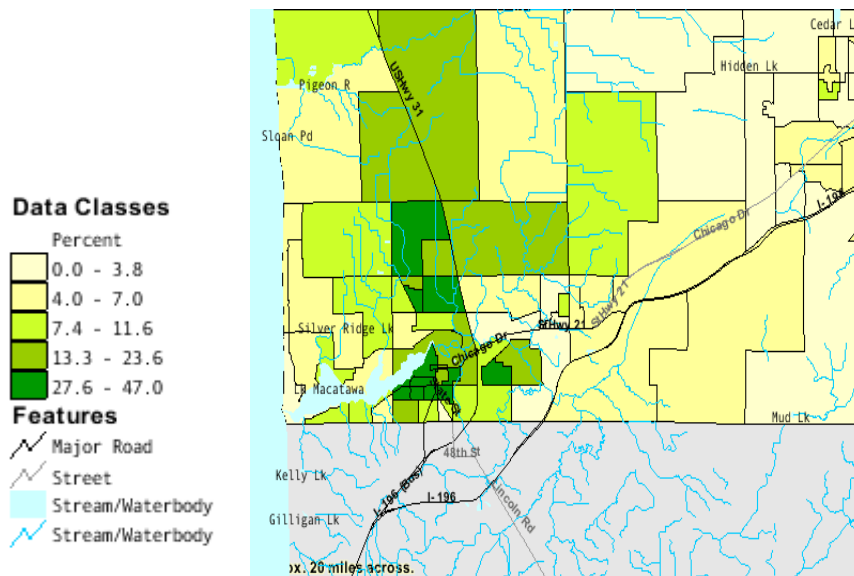
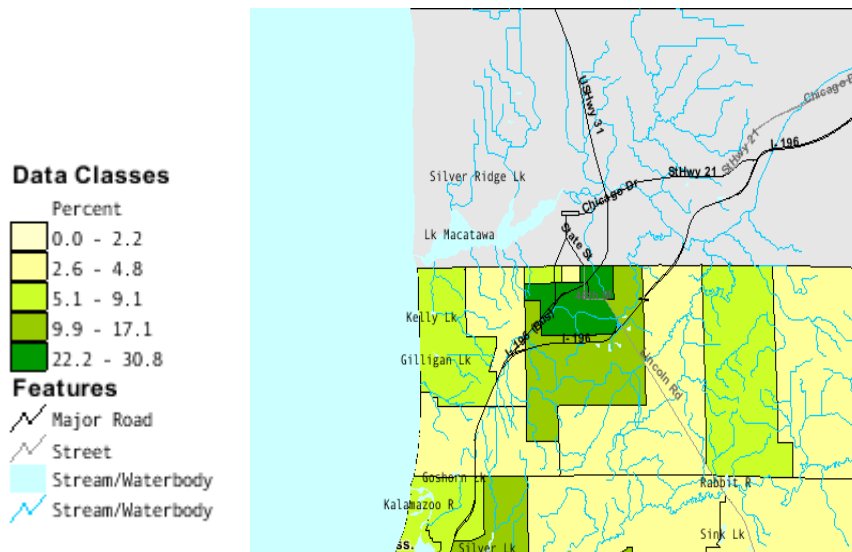


Figure 2: Limited English Proficiency Population Map, Northwestern Allegan County

Percent of Persons 5 Years and Over Who Speak a Language Other than English at Home
by Census Block Group
Northwestern Allegan County, Michigan
(Source: U.S. Census Bureau)



Factor 2: The Frequency with which LEP Individuals come into contact with the Program

An established and growing Latino/Spanish-speaking community resides within the MAX Transit service area, the population primarily concentrated within the city limit of Holland, but also in notable numbers residing in portions of Holland Charter Township, with fewer numbers reported within the city limit of Zeeland.

MAX Transit has in the past and continues to participate in Latino-centered/organized events in which local business and organizations in the Holland/Zeeland area are invited to attend and share service information with each other and the community. Events attended include the annual Fiesta celebration and the Migrant Community Fair, both held each spring. The events are staffed by multiple MAX Transit employees, including at least one bilingual member of the staff. Printed information, including bus schedules and “how to” manuals, are provided and made available in both English and Spanish, and as standard practice are brought to all MAX Transit community events and seminars.

MAX continues to provide bilingual Spanish-speaking telephone operators to assist Spanish-speaking LEPs at its main passenger transfer and service center (currently, MAX Transit

employs 4 Spanish-speaking Latino operators), at least one of whom is available on a daily basis during service hours.

As part of its Limited English Proficiency Plan, MAX will work with staff to recognize, identify, and record the frequency with which persons identified as specific Asian language-speaking LEPs (with fewer but notable numbers within the service area, primarily in Holland Township) come into contact with MAX staff. Possible contact points include but are not limited to: Community marketing events, telephone inquiries, service center walk-in visits, day-to-day bus route operations, or written or verbal inquiries or outreach, formal or informal, from related local groups and organizations. Based upon findings and occurrences, including ongoing demographic trends, MAX will routinely evaluate the need and feasibility of providing print information and/or direct language assistance in specific languages other than English and Spanish as part of its LEP program reviews.

Factor 3: The Nature and Importance of the Program, Activity, or Service Provided by the Recipient to the LEP Community

Without a conscious effort from federal recipients to make available adequate and necessary information to all persons, some populations may not have fair and equal access to important, perhaps life-saving services. MAX recognizes that access to public transportation is crucial to many populations within the community, regardless of background. As the provider of public transportation for the greater Holland-Zeeland area, MAX does not provide direct emergency services or assistance to the community in situations that potentially have serious or life-threatening implications on an LEP individual, especially compared to services such as health, emergency transportation, utilities, fire/police protection, and other emergency services.

The Macatawa Area Express Transportation Authority does understand its role within the community and operates in full agreement with the U.S. Department of Transportation's Limited English Proficiency Guidance Section V (4) recognizing that the inability of an LEP person to effectively utilize public transit (due to a language barrier) could in fact adversely affect his or her ability to obtain quality health care, child care, education, or access to employment opportunities within the service area.

Based on the historic frequency of contact between staff and the Spanish-speaking community within the service area, several steps have already been made to help accommodate the Spanish-speaking population, including translation of the bus route schedule, and translation of "how to" brochures outlining the system's demand-response service.

Holland-Area Community Organizations Serving Limited English Proficiency (LEP) Individuals

It has always been the aim of the Macatawa Area Express Transportation Authority to serve the community in the best way possible. A listing (see Appendix A) identifies organizations MAX Transit has either partnered with in the past or has contacted seeking input on its LEP Plan and its overall service in general. Copies of the LEP Plan will be submitted annually to

each organization for both awareness purposes and to open the plan as well to public feedback—all to better serve the community as a whole.

Factor 4: The Resources Available to the Recipient and the Overall Cost

Although current resources remain limited, MAX does continue to provide bilingual operators and Spanish-language bus schedules and brochures, and has expanded its availability of Spanish language “vital” documents and its website as part of its LEP planning. Because the remaining LEP population in the service area does not currently represent a single yet significant proportion group of individuals, no further language assistance is planned at this time; demographic trends and frequency of contact will be monitored and incorporated into the Macatawa Area Express Transportation Authority LEP Plan review process.

Identifying LEP Individuals Who Need Language Assistance

To help identify and record the primary language of a Limited English Proficiency individual speaking a language other than Spanish, MAX staff will make use of a language identification listing during any such initial encounters, and to report the encounter directly to the transit system’s Marketing/Customer Service department.

The official listing to be utilized by MAX Transit, the 2004 Census Test Language Identification Flashcard, has been developed by the U.S. Census Bureau and contains a check box with the phrase “Mark this box if you read or speak (name of each language)” listed in 38 different languages. The flashcard is used by governmental and non-governmental agencies to identify the primary language of LEP individual during face-to-face contacts. The Language Identification Flashcard has been made available at the front desk of the MAX Transit main transfer station, the Padnos Transportation Center.

MAX staff will also be instructed to utilize the Language Identification Flashcard and report any contacts made during other instances where LEP contact may occur, such as at public meetings, workshops, or community marketing events and shows. Through the use of such cards, MAX Transit will be better able to record any contact with an LEP individual.

Providing Language Assistance Measures

Spanish-language assistance will be provided for LEP individuals through the translation of key or “vital” documents and materials, as well as through oral language interpretation when necessary and when possible. Translation of all MAX Transit plans and materials is not possible due to cost restrictions and secondary population levels that do not warrant such measures.

MAX Transit continues to provide Spanish-language bus schedules and “how to” guides among its inventory of translated brochures. In addition, the transit system’s website offers a

Spanish-translation version through the use of Google Translate language translation software. Spanish-language staff is able to assist with written communications and small document translation requests. Spanish-language staff members also assist customers who are Spanish-speaking LEPs. Beyond this scope, AAA Translation (see below) can be contacted to provide professional language translations services in more than 150 languages.

As part of the Limited English Proficiency Plan, “vital” documents (those documents deemed necessary to understanding the transit system’s policies and safety measures, and for utilizing all available services) have been identified and translated into Spanish. Examples of these documents include the demand-response No-Show Policy, No-Show infraction letters, Title VI policies and complaint forms, Half-Fare Eligibility forms, ADA Assessment Applications, holiday-related service notices, and the MAX system’s general Comment/Complaint form.

Since MAX is unable to determine which recipients of No-Show letters might be LEPs, the English version of the No-Show letter contains a line in Spanish notifying the reader to call the MAX offices to request a Spanish-Language letter. A similar format will be used on future documents that are routinely mailed and deemed “vital” by the MAX Transit system.

All written correspondence, regardless of language, is to be directed through the Customer Service/Marketing department, where the document, if need be, can be translated either through internal or external sources. A professional response or action can be determined, and a translation made back into the original language for return to the original LEP individual.

To date since 2008, MAX Transit has recorded two (2) contacts with Limited English Proficiency individuals other than Spanish-speaking LEPs (1 Chinese, 1 Vietnamese), whereby the use of the Language Identification Flashcard and the AAA Translation service assisted staff in meeting each LEP’s needs. The transit system has selected and continues to provide for financially on an on-demand basis (rather than under contract) the following organization for language interpretation services at no cost to Limited English Proficiency individuals:

AAA Translation
17295 Chesterfield Airport Rd., Suite 200
Chesterfield MO 63005
888-263-0481
www.aaatranslation.com

Training of Staff

Members of the MAX Transit staff will be made aware of their obligations to provide meaningful access to information and services for Limited English Proficiency individuals, and will be properly trained. MAX will provide an LEP review for current employees on an annual basis, and will include LEP training as part of the new employee orientation process.

Management staff will also be made aware of the processes in place so they can reinforce its importance and ensure its implementation by staff.

Staff training will include, but is not limited to the following:

- Understanding the Title VI LEP responsibilities.
- Background on LEP populations within the service area.
- Description of the type of language assistance MAX currently provides.
- Use of the LEP language identification flashcards.
- How to use the AAA Translation language assistance service.
- Documentation of LEP language assistance requests.
- How to handle a complaint.

In key areas, step-by-step instructions (See Appendix B) have been outlined, and as part of training, will be distributed to all transit system Customer Service and Bus Operator staff in event contact is received from an LEP person in need of interpretation services.

A policy outlining the responsibilities of all transit system employees in the use of interpreters included in Appendix C, and a listing of bilingual staff is shown in Appendix D.

A copy of LEP Contact Documentation Form is shown in Appendix E.

Providing Notice to LEP Persons of the Availability of Language Assistance

The Macatawa Area Express Transportation Authority has established the following methods to inform Spanish-speaking LEP individuals, supporting organizations, as well as the general public, of available no-fee LEP services.

- An English/Spanish sign (see sample in Appendix F) has been incorporated into the Title VI statement and has been posted at the front entrance of the transit system's central transfer center. The notice will also allow for LEPs traveling between cities to learn of language interpretation services. The central transfer center also serves Amtrak passengers and inter-city bus lines. In the past, MAX Transit staff has assisted Spanish-speaking LEPs using transportation other than our own, and will continue to do so when needed.

- A phrase in English/Spanish will be added to reprints of the master bus schedules, reminding passengers of the availability of language services offered by MAX Transit, free of charge.
- When possible, MAX Transit will have present at least one Spanish-speaking member of the staff at any public meeting intended for educational purposes or for gathering community input. Spanish-speaking staff will be on-hand to serve LEPs during community marketing events and shows, when possible, especially given scenarios where demographics point to a higher probability of participation by Speaking-speaking LEPs.
- A notice has been posted on the MAX Transit website www.catchamax.org under the "Contact Us" section notifying visitors of the availability of language assistance at no cost to the user. The notice has been posted in both English and Spanish.
- On an annual basis MAX Transit will mail copies of its LEP plan and seek input from local organizations who serve the LEP population (list shown in Appendix A) concerning the plan, while at the same time notifying them of available language services offered by the transit system.

Current budget and staff limitations do not allow for the implementation of all available notification techniques. However, MAX Transit will consider additional notification options in the future, especially those suggested from within the local LEP community.

Monitoring and Updating the LEP Plan

The Macatawa Area Express Transportation Authority's Limited English Proficiency Plan has been designed to be flexible and can be easily updated as needed. At a minimum, the LEP plan will be evaluated and updated on an annual basis.

Each update will include but will not be limited to a review of the following information:

- Feedback and frequency from documentation/recorded LEP encounters.
- Establishing whether or not LEP needs have been met through existing assistance.
- Nature and importance of activities to LEP persons.
- Evaluating local population/demographic changes, particularly among LEPs.
- Feedback from passengers and community organizations.
- A review of whether any complaints have been received.
- Availability of resources and the costs imposed.

Title VI Complaint Procedure

The Macatawa Area Express Transportation Authority has in place a Title VI Compliant Procedure which outlines a process for local disposition of complaints and is consistent with the guidelines found in Circular 4702.1A dated May 13, 2007. Forms available to the public upon request are shown in Appendix G and Appendix H.

The complaint procedure has five steps, outlined below:

1. **Submission of complaint:** Any person who feels that he or she, individually or as a group of persons on the basis of race, color, creed, age, marital status, physical disability, mental disability, low income status, national origin, religion, sex/gender, or retaliation has been excluded from or denied the benefits of, or subjected to discrimination under a program receiving federal financial assistance through the Macatawa Area Express Transportation Authority may file a written complaint to the MAX Coordinator. Such complaint must be filed within 60 days after the person believes the discrimination occurred.
2. **Referral to Review Officer:** Upon receipt of the Complaint, the MAX Coordinator, one or more staff review officers, as appropriate, will evaluate and investigate the complaint in consultation with the MAX attorney. The staff review officer(s) shall complete the evaluation and investigation no later than 45 calendar days after the date MAX received the complaint. If more time is needed, the MAX Coordinator shall notify the Complainant of the estimate time frame for completing the review. Upon completion of the review, the staff review officer(s) shall make a recommendation regarding the merit of the Complaint and whether remedial actions are available to provide resolution. Additionally, the staff review officer(s) may recommend improvements to MAX's processes, Title VI, and environmental justice, as appropriate. The MAX Coordinator will issue MAX's written response to the Complainant.
3. **Request for Reconsideration:** If the Complainant disagrees with the MAX Coordinator's response and resolution, he or she may request reconsideration by submitting the request, in writing, to the MAX Coordinator within 10 calendar days after receipt of the MAX Coordinator's response. The request for reconsideration shall be sufficiently detailed to contain any items the Complainant feels were misunderstood by the MAX Coordinator. The MAX Coordinator will notify the Complainant to either accept or reject the request for reconsideration within 10 calendar days. In cases in which the MAX Coordinator agrees to reconsider, the matter shall be returned to the staff review officer(s) to evaluate in accordance with Paragraph 2, above.
4. **Appeal:** If the request for reconsideration is denied, the Complainant may appeal the MAX Coordinator's response to the MAX Executive Committee no later than 10 calendar days after receipt of the MAX Coordinator's written rejection reconsideration.

5. Submission of the Complaint to the Department of Transportation: If the Complainant is dissatisfied with MAX's resolution of the complaint, he or she may also submit a complaint to the Department of Transportation for investigation. In accordance with Chapter VII, Title VI Discrimination Code, FTA Circular 4702.1A, such a complaint must be submitted within 180 calendar days after the alleged discrimination. Chapter VII of the FTA Circular 4702.1A, which outlines the complaint process to the Department of Transportation, may be obtained by requesting a copy from the MAX office at (616) 928-2486.

A sample of the Title VI complaint form is shown in Appendix G. A Spanish-language version of the Title VI form is available upon request from MAX Transit staff members.

Dissemination of the LEP Plan

The MAX Transit LEP Plan will be posted on the website: www.catchamax.org. For individuals without internet services, the Herrick Public Library in downtown Holland offers web access free-of-charge. Following updates, the LEP Plan will be printed and mailed to local community organizations serving LEP individuals (see Appendix A). The LEP Plan will be available upon request in hard copy at the Padnos Transportation Center. Requests will also be fulfilled via mail, or sent electronically in PDF format over email.

Questions or comments regarding the LEP Plan should be directed to:

Charles Veldhoff
Macatawa Area Express
171 Lincoln Ave., Suite 20
Holland MI 49423

Phone: 616.928.2494
Fax: 616.928.2467

Email: c.veldhoff@catchamax.org

APPENDIX A**Community organizations that service populations with Limited English Proficiency**

<p>Holland Public Schools Phil Schlemmer, Director of Curriculum 156 W. 11th St. Holland MI 49423 616.494.2042</p>	<p>Michigan Works! Holland Service Center Bill Raymond, Director 121 Clover Street Holland MI 49423 616.393.4433</p>
<p>Lakeshore Ethnic Diversity Alliance Gail Harrison, Migrant Mentoring Coordinator PO Box 2945 Holland MI 49422 616.846.9074</p>	<p>West Ottawa Public Schools Jim Nicolette, Asst. Superintendent/Curriculum 1138 136th Ave. Holland MI 49424 616.738.5731</p>
<p>Latin Americans United for Progress Roberto Jara, Executive Director PO Box 1384 Holland MI 49422 616.392.5058</p>	<p>Lao Christian Reformed Church Somsay Inthisorn, Pastor 940 Royce Ave. Holland MI 49423 616.546.9094</p>

APPENDIX B

Instructions for Limited English Proficiency Language Interpretation Assistance

BUS OPERATORS: It may be difficult for a non-bilingual bus operator to provide assistance to a Limited English Proficiency person who boards the vehicle and requests information.

In such circumstances, the operator is required to:

1. Ask if another passenger on the vehicle could serve as a translator.
2. Provide the phone number to the agency's transfer center customer service desk, which will provide translation services.
3. Direct the LEP person to a translated schedule placed aboard the vehicle.
4. If a riding passenger, direct them to the transfer center, where language assistance is available.
5. Document the encounter by notifying customer service, or using form shown in Appendix E.

CUSTOMER SERVICE/PHONE OPERATORS:

NOTE: It is against federal law to charge any service fees to a Limited English Proficiency individual. All associated fees must be paid for by Macatawa Area Express (MAX).

If an interpreter is unavailable in the office, follow the instructions shown below. It only takes four simple steps to get connected with an interpreter:

Step 1

Use the Language Flashcard to identify the customer's language.

Step 2

Call AAA Translation: 1-888-263-0481

Step 3

Enter MAX Transit's PIN Code ****, and you'll be speaking with an Interpreter within seconds.

Step 4

Remember to document the LEP encounter with form shown in Appendix E.

*This service is recommended for all non-emergency situations.

AAA Translation Services offers:

- Language interpreting & translation services for more than 150 languages.
- U.S. cost is \$2.25 per minute, billed in one minute increments.
- 24 hours, 7 days a week, 365 days a year.
- On-demand, pay-as-you-go service plan.

APPENDIX C

Policy Regarding the Use of Interpreters/Translators

IMPORTANT: Interpreters and translators should not deviate into a role as counselor, legal advisor, or any other role aside from interpreting or translator.

General Guidelines:

1. Be sure to always speak directly to your customer, not to the interpreter.
2. Always use words, not body language or gestures, to convey meaning.
3. Speak audibly and in a positive tone.
4. Always speak slowly and clearly.
5. Do not allow the customer to wait alone, or over extended periods.
6. Be prepared to explain technical terms or jargon to the interpreter, especially if the interpreter is unfamiliar with mass transit.
7. When communicating, be sure to use simple vocabulary and easy-to-understand terms.
8. Use short sentences, pausing frequently to allow the interpreter to speak.
9. Ask one question at a time.
10. Do what you can to control the environment.

To help assist the customer, remember to keep the following in mind:

1. Ask your customer if they feel they understand your question and if they need to ask any questions themselves.
2. Ask your customer if they need anything re-explained. If your message is not clearly understood, be prepared to say it differently.
3. If you think that your message may not be fully understood by your customer, double check by saying "Tell me what you understand."

To help assist the interpreter, remember to keep the following in mind:

1. Allow the interpreter the time needed to provide the clearest interpretation.
2. Allow the interpreter to stop you and seek clarification when appropriate.
3. Allow the interpreter to take notes if things get complicated.
4. Allow the interpreter to clarify cultural issues, if necessary.

APPENDIX D**Listing of Bilingual MAX Transit Staff**

<u>Name:</u>	<u>Job Title:</u>	<u>Language:</u>
Lucia Arrendondo	Bus Driver	Spanish
Mayra Balcazar	Administrative Assistant (Operations Bldg.)	Spanish
Paul Ferreira	Bus Washer (Operations Bldg.)	Spanish
Susana Gomez	Telephone Operator (Padnos Center)	Spanish
Esther Howe	Bus Driver	Spanish
Linda Pena	Telephone Operator (Padnos Center)	Spanish
Jackie Salgada	Telephone Operator (Padnos Center)	Spanish
Gama Soto	Telephone Operator (Padnos Center)	Spanish
Jacob Trevino	PM Road Supervisor	Spanish

APPENDIX E**LEP Documentation Form/To Be Filled Out By MAX Staff**

Date of contact ____ / ____ / ____

Location of contact: _____

Name of staff member filling out form: _____

Indicate language of LEP customer: SPANISH Other: _____

Did the LEP customer purchase a bus pass? (Circle one) YES NO

How were the LEP language needs met? (Circle one) MAX TRANSLATOR AAA TRANSLATIONS

Please describe the nature of the LEP customer's visit:

Were their needs met by the end of the visit? YES NO

Return completed form to: Charles Veldhoff, MAX Transit Customer Service.

LEP Documentation Form/To Be Filled Out By MAX Staff

Date of contact ____ / ____ / ____

Location of contact: _____

Name of staff member filling out form: _____

Indicate language of LEP customer: SPANISH Other: _____

Did the LEP customer purchase a bus pass? (Circle one) YES NO

How were the LEP language needs met? (Circle one) MAX TRANSLATOR AAA TRANSLATIONS

Please describe the nature of the LEP customer's visit:

Were their needs met by the end of the visit? YES NO

Return completed form to: Charles Veldhoff, MAX Transit Customer Service.

APPENDIX F

We can help!

Free language assistance is available. Please proceed to the main office, and MAX staff will promptly assist you.

¡Podemos ayudar!

La ayuda libre del idioma está disponible. Continúe por favor a la oficina principal, y al personal MAX inmediatamente le ayudará.

NOTICE: Your rights under Title VI:

The Macatawa Area Express Transportation Authority operates without regard to race, color, or national origin. To request additional information on MAX's Title VI obligations, please contact the Title VI staff officer at 616-928-2494. A Title VI complaint form can be obtained at the Macatawa Area Express website www.catchamax.org, by calling 616-928-2494, or via mail by writing:

MAX Transit
171 Lincoln Ave., Suite 20
Holland MI 49423

La NOTA: Sus derechos bajo Titula VI:

El Area de Macatawa Expresa el Transporte operar de Autoridad sin la consideración para competir, colorar, o el origen nacional. Para solicitar información adicional en obligaciones MAX de Título VI, contacta por favor al oficial del personal del Título VI en 616-928-2494. Una forma de la queja del Título VI puede ser obtenida en el sitio web MAX www.catchamax.org, llamando 616-928-2494, o vía el correo escribiendo:

MAX Transit
171 Lincoln Ave., Suite 20
Holland MI 49423

APPENDIX G**TITLE VI PROGRAM COMPLAINT FORM**

Macatawa Area Express Transportation Authority
 171 Lincoln, Suite 20
 Holland MI 49423
 (616) 928-2475
 TDD-Michigan Relay Center 1-800-649-3777
 Email: max@cityofholland.com

The Title VI Program prohibits discrimination on the basis of protected status or retaliation in any programs receiving federal financial assistance.

Name (Print): _____

Mailing Address: _____

Work Phone: _____ Home Phone: _____

Other Phone Number: _____

Indicate protected status you believe was basis for discrimination:

<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> Creed
<input type="checkbox"/> Age	<input type="checkbox"/> Marital Status	<input type="checkbox"/> Physical Disability
<input type="checkbox"/> Mental Disability	<input type="checkbox"/> Low Income Status	<input type="checkbox"/> National Origin
<input type="checkbox"/> Religion	<input type="checkbox"/> Sex/Gender	<input type="checkbox"/> Retaliation

Explain why you believe discrimination has occurred. Please provide dates, location and time of discrimination. If witnessed, please provide names, addresses and telephone numbers. Use back of this form or additional sheets as necessary.

Indicate the person(s) you believe responsible for the discrimination:

Name: _____

Work Location (if known): _____

What remedy are you requesting? Please be specific.

Signature

Date

APPENDIX H

TITLE VI COMPLAINT PROCEDURE

The Macatawa Area Express Transportation Authority has in place a Title VI Compliant Procedure which outlines a process for local disposition of complaints and is consistent with the guidelines found in Circular 4702.1A dated May 13, 2007.

The complaint procedure has five steps, outlined below:

1. **Submission of complaint:** Any person who feels that he or she, individually or as a group of persons on the basis of race, color, creed, age, marital status, physical disability, mental disability, low income status, national origin, religion, sex/gender, or retaliation has been excluded from or denied the benefits of, or subjected to discrimination under a program receiving federal financial assistance through the Macatawa Area Express Transportation Authority may file a written complaint to the MAX Coordinator. Such complaint must be filed within 60 days after the person believes the discrimination occurred.
2. **Referral to Review Officer:** Upon receipt of the Complaint, the MAX Coordinator, one or more staff review officers, as appropriate, will evaluate and investigate the complaint in consultation with the MAX attorney. The staff review officer(s) shall complete the evaluation and investigation no later than 45 calendar days after the date MAX received the complaint. If more time is needed, the MAX Coordinator shall notify the Complainant of the estimate time frame for completing the review. Upon completion of the review, the staff review officer(s) shall make a recommendation regarding the merit of the Complaint and whether remedial actions are available to provide resolution. Additionally, the staff review officer(s) may recommend improvements to MAX's processes, Title VI, and environmental justice, as appropriate. The MAX Coordinator will issue MAX's written response to the Complainant.
3. **Request for Reconsideration:** If the Complainant disagrees with the MAX Coordinator's response and resolution, he or she may request reconsideration by submitting the request, in writing, to the MAX Coordinator within 10 calendar days after receipt of the MAX Coordinator's response. The request for reconsideration shall be sufficiently detailed to contain any items the Complainant feels were misunderstood by the MAX Coordinator. The MAX Coordinator will notify the Complainant to either accept or reject the request for reconsideration within 10 calendar days. In cases in which the MAX Coordinator agrees to reconsider, the matter shall be returned to the staff review officer(s) to evaluate in accordance with Paragraph 2 , above.
4. **Appeal:** If the request for reconsideration is denied, the Complainant may appeal the MAX Coordinator's response to the MAX Executive Committee no later than 10 calendar days after receipt of the MAX Coordinator's written rejection reconsideration.
5. **Submission of the Complaint to the Department of Transportation:** If the Complainant is dissatisfied with MAX's resolution of the complaint, he or she may also submit a complaint to the Department of Transportation for investigation. In accordance with Chapter VII, Title VI Discrimination Code, FTA Circular 4702.1A, such a complaint must be submitted within 180 calendar days after the alleged discrimination. Chapter VII of the FTA Circular 4702.1A, which outlines the complaint process to the Department of Transportation, may be obtained by requesting a copy from the MAX office at (616) 928-2486.