SECTION 9: LIMITED ENGLISH PROFICIENCY (LEP) POLICY

BACKGROUND & INTRODUCTION

On August 11, 2000, the President signed E.O. 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 assistance provide meaningful access to their LEP applicants and beneficiaries. Executive Order 13166 applies to all federal agencies, 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.

KEY LIMITED ENGLISH PROFICIENCY POLICY COMPONENTS

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 Policy. 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 policy 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 Policy.

This policy 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.

[20]
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 for ensuring reasonable and 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 MAX.
2. The frequency with which LEP individuals come in contact with MAX.
3. The nature and importance of the program, activity, or service provided by MAX to the LEP Community.
4. The resources available to MAX 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.

Additional detail can be found in the Dept. of Transportation issued Policy Guidance Concerning Recipients’ Responsibilities to LEP Persons, Federal Register: December 14, 2005 (Volume 70, Number 239).

A summary of the results of the MAX four-factor analysis is contained in the following section.

FACTOR 1: THE PROPORTION, NUMBER, AND DISTRIBUTION OF LEP PERSONS

The U.S. Census Bureau (2010-2014 American Community Survey) 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 MAX’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, with any change from the last plan update noted in parenthesis.

<table>
<thead>
<tr>
<th></th>
<th>Population 5 years old &amp; older (gain/loss)</th>
<th>Speak a Language Other than English at Home (gain/loss)</th>
<th>Percent Speaking a Language Other than English at Home (Change)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Holland, City of</td>
<td>30,573 (-1,075)</td>
<td>6,326 (-248)</td>
<td>20.7% (-0.1%)</td>
</tr>
<tr>
<td>Holland Charter Twp.</td>
<td>33,868 (+2,511)</td>
<td>9,043 (+1,562)</td>
<td>26.7% (+2.8%)</td>
</tr>
<tr>
<td>Zeeland, City of</td>
<td>5,159 (+123)</td>
<td>562 (+250)</td>
<td>10.9% (+4.7%)</td>
</tr>
</tbody>
</table>
Table 2: Among the Languages Spoken at Home, the Proportion of Population 5 Years Old or Older Speaking English Less Than “Very Well.”

<table>
<thead>
<tr>
<th></th>
<th>Spanish, speaking English less than “very well.”</th>
<th>Other Indo-European, speaking English less than “very well.”</th>
<th>Asian &amp; Pacific Islander, speaking English less than “very well.”</th>
</tr>
</thead>
<tbody>
<tr>
<td>Holland, City of</td>
<td>6.5% (-0.4%)</td>
<td>1.8% (+1.2%)</td>
<td>2.7% (+2.2%)</td>
</tr>
<tr>
<td>Holland Charter Twp.</td>
<td>7.4% (-0.2%)</td>
<td>0.1% (+0.5%)</td>
<td>3.4% (-1.5%)</td>
</tr>
<tr>
<td>Zeeland, City of</td>
<td>3.7% (+2.4%)</td>
<td>1.0% (+0.8%)</td>
<td>0.1% (+0.1%)</td>
</tr>
</tbody>
</table>

**FACTOR 2: THE FREQUENCY WITH WHICH LEP INDIVIDUALS COME INTO CONTACT WITH THE SERVICE**

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

MAX has in the past and continues to participate in Latino-centered/organized events in which local business and organizations in the Holland area are invited to attend and share service information with each other and the community. Printed information includes bus schedules and bus stop pre-closure notices (posted prior to road closures/special events) available in both English and Spanish. As standard practice, both English and Spanish bus schedules are made available at 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 2 Spanish-speaking operators), at most times at least one of whom is available during service hours. Reserve-A-MAX travel training is also available upon request, with a Spanish-speaking staff member provided when requested, and available free-of-charge.

As part of its Limited English Proficiency Policy, 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 SERVICE PROVIDED 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.

HOLLAND-AREA 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. The listing below identifies organizations MAX has either partnered with in the past or has contacted seeking input on its LEP Policy and its overall service in general. Copies of the LEP Policy will be submitted annually to each organization for both awareness purposes and to open the Policy as well to public feedback—all to better serve the community as a whole:

<table>
<thead>
<tr>
<th>Holland Public Schools</th>
<th>Latin Americans United for Progress</th>
</tr>
</thead>
<tbody>
<tr>
<td>Patti Dobias, Director of School Improvement</td>
<td>Eduardo Amaya, Interim Executive Director</td>
</tr>
<tr>
<td>320 W. 24th Street</td>
<td>96 W. 15th St., Suite 101</td>
</tr>
<tr>
<td>Holland MI 49423</td>
<td>Holland MI 49423</td>
</tr>
<tr>
<td>616.494.2000</td>
<td>616.594.7108</td>
</tr>
<tr>
<td><a href="mailto:pdobias@hollandpublicschools.org">pdobias@hollandpublicschools.org</a></td>
<td><a href="mailto:ernesto@laup.org">ernesto@laup.org</a></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Lakeshore Ethnic Diversity Alliance</th>
<th>West Michigan Works!</th>
</tr>
</thead>
<tbody>
<tr>
<td>Latoya Booker, Executive Director</td>
<td>Ottawa County Service Center</td>
</tr>
<tr>
<td>PO Box 2945</td>
<td>Allise Wilkerson, Talent Solutions Manager</td>
</tr>
<tr>
<td>Holland MI 49422</td>
<td>121 Clover St.</td>
</tr>
<tr>
<td>616.846.9074</td>
<td>Holland MI 49423</td>
</tr>
<tr>
<td><a href="mailto:ed@ethnicdiversity.org">ed@ethnicdiversity.org</a></td>
<td>616.396.2154</td>
</tr>
<tr>
<td></td>
<td><a href="mailto:awilkerson@westmiworks.org">awilkerson@westmiworks.org</a></td>
</tr>
</tbody>
</table>

| Lao Christian Reformed Church     | West Ottawa Public Schools                           |
| Lee Khang, Reverend              | Jeri Page                                            |
| 940 Royce Ave.                   | Assistant Superintendent for Instructional Services |
| Holland MI 49423                 | 1138 136th Ave.                                     |
| 616.546.9094                     | Holland MI 49424                                    |
| lcrcholland@gmail.com            | 616.786.2050 ext. 2083                              |
|                                   | pagej@westottawa.net                                 |

FACTOR 4: THE RESOURCES AVAILABLE AND THE OVERALL COST

Although current resources remain limited, MAX continues to provide bilingual operators and Spanish options are included or available separately in bus schedules, brochures, and pre-street closure bus stop notices. MAX has expanded its availability of Spanish-language “vital” documents and translating its website (multiple languages) as part of its LEP planning. Spanish-language media has been utilized, through the Holland Sentinel’s Spanish
newspaper *Nuestra Comunidad*, as well as online ads with Charter Media which brokers MAX ads on websites utilized more heavily by area Latinos, and through radio ads on local station WTHC’s Spanish-speaking Sunday evening programming.

Because the remaining LEP population in the service area does not currently represent a single yet significant proportional group of individuals, no further language assistance is planned; demographic trends and frequency of contact will be monitored, and incorporated into the Macatawa Area Express LEP Policy review process.

**IDENTIFYING LEP INDIVIDUALS WHO NEED LANGUAGE ASSISTANCE**

To help identify and record the primary language of a Limited English Proficiency individual, 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 Title VI Officer. Additionally, review of the translation service billing cycle will be used as a system double-check, which lists encounter dates, times, and languages used.

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 and double-checks, MAX Transit will be better able to record any contact with an LEP individual.

**PROVIDING LANGUAGE ASSISTANCE MEASURES**

In compliance with the “safe harbor” threshold, 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, bus stop pre-closure notices, and “how to” guides among its inventory of translated brochures. In addition, the transit system’s website offers a Spanish-translation version—as well as additional language options—through the use of translation software, accessible by clicking a flag icon. 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 language translations services in more than 150 languages. Additionally, Google Translate—a free, web-based translation service—is available for use by either office staff, or by bus operators, accessed through onboard vehicle tablets.

As part of the LEP Policy, “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, 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 letter contains a line in Spanish notifying the reader to call the offices to request a Spanish-Language letter. A similar format will be used on future documents routinely mailed and deemed “vital” by the MAX Transit system.
Written correspondence, regardless of language, is to be directed through the Senior Transit Planner, where the document 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.

Since 2008, MAX Transit has recorded contacts with Limited English Proficiency individuals other than Spanish-speaking LEPs:

- (2) Mandarin Chinese
- (1) Cantonese Chinese
- (1) Laotian
- (2) Vietnamese
- (4) Spanish*

*Spanish-speaking staff members were unavailable for translation assistance.

During the above documented encounters, use of the Language Identification Flashcard, and Google Translate or the AAA Translation service assisted staff in meeting each LEP’s needs. When needed, 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, for no cost to Limited English Proficiency individuals:

AAA Translation
17295 Chesterfield Airport Rd., Suite 200
Chesterfield MO 63005
888-263-0481
www.aatranslation.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 and Google Translate language assistance services.
- Documentation of LEP language assistance requests.
- How to handle a potential Title VI / LEP complaint.

In key areas, the step-by-step instructions in the following section 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.
INSTRUCTIONS FOR 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 requesting information.

In such circumstances, bus operators are required at a minimum 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.

GOOGLE TRANSLATE: Translations can be accessed via your onboard vehicle tablets.

PLEASE NOTE: COMPLETE INSTRUCTIONS ARE AVAILABLE IN APPENDIX K.

Things to keep in mind when using Google Translate:

1. You may need to try different languages if initially unknown;
2. Use short, simple terms for translation (translations can be read visually and/or read audibly);
3. IMPORTANT! Document the encounter by completing the Title VI/LEP section on the bottom of your Driver’s Sheet (see Page 28).

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).

AAA TRANSLATION (AVAILABLE IN ADDITION TO GOOGLE TRANSLATE):

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 on Page 28.

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

AAA Translation 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.
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.

LISTING OF BILINGUAL STAFF

<table>
<thead>
<tr>
<th>Name</th>
<th>Job Title</th>
<th>Language</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lucia Arrendondo</td>
<td>Bus Operator</td>
<td>Spanish</td>
</tr>
<tr>
<td>Jacinto Flores</td>
<td>Bus Operator</td>
<td>Spanish</td>
</tr>
<tr>
<td>Elisa Hoekwater</td>
<td>Executive Director</td>
<td>Spanish</td>
</tr>
<tr>
<td>Margarita Lugo</td>
<td>Bus Operator</td>
<td>Spanish</td>
</tr>
<tr>
<td>Leandro Montes</td>
<td>Bus Operator</td>
<td>Spanish</td>
</tr>
<tr>
<td>Hannah Pedersen</td>
<td>Transit Planner</td>
<td>Spanish</td>
</tr>
<tr>
<td>Nicandro Sanchez</td>
<td>Bus Operator</td>
<td>Spanish</td>
</tr>
<tr>
<td>Gama Soto</td>
<td>Telephone Operator (Padnos Center)</td>
<td>Spanish</td>
</tr>
<tr>
<td>Jacob Trevino</td>
<td>Road Supervisor (AM)</td>
<td>Spanish</td>
</tr>
<tr>
<td>Noe Ybarra</td>
<td>Bus Operator</td>
<td>Spanish</td>
</tr>
</tbody>
</table>
LIMITED ENGLISH PROFICIENCY (LEP) CONTACT DOCUMENTATION FORM:

**LEP Documentation Form:**

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 GOOGLE TRANSLATE

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, Senior Transit Planner.

**LEP Documentation Form/Bus Operators:**

<p>| MAX TIME RECORD SHEET-All Buses with a tablet please use electronic fare reporting |
|-------------------------------|-----------------|-----------------|-----------------|-----------------|</p>
<table>
<thead>
<tr>
<th>DATE</th>
<th>ROUTE/RUN</th>
<th>BUS No.</th>
<th>DRIVER NAME</th>
</tr>
</thead>
</table>

**FUEL STOPS**

<table>
<thead>
<tr>
<th>BUS #</th>
<th>GALLONS</th>
<th>MILEAGE</th>
<th>TIME IN</th>
<th>TIME OUT</th>
</tr>
</thead>
<tbody>
<tr>
<td>BUS 1</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>BUS 2</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>BUS 3</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**BUS SWITCH OUT**

<table>
<thead>
<tr>
<th>BUS #</th>
<th>TIME IN</th>
<th>TIME OUT</th>
<th>BEG ODOM</th>
<th>END ODOM</th>
</tr>
</thead>
<tbody>
<tr>
<td>ORIG BUS</td>
<td>XXXXXXXX</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>NEW BUS</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>NEW BUS</td>
<td></td>
<td></td>
<td></td>
<td>XXXXXXXX</td>
</tr>
</tbody>
</table>

**SPECIAL RUNS**

<table>
<thead>
<tr>
<th>SPECIAL RUN #</th>
<th>LOCATION</th>
<th>PICK UP TIME</th>
<th>DROP OFF TIME</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>CASH</th>
<th>CHARGE</th>
<th>CHECK</th>
<th>PREPAID</th>
<th>PUNCH</th>
</tr>
</thead>
</table>

$5 PAID

<table>
<thead>
<tr>
<th># OF PASSENGERS PER TYPE</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>REGULAR/ATTENDANT</th>
<th>YOUTH</th>
<th>SENIOR</th>
<th>ADA</th>
</tr>
</thead>
</table>

Google® Translate - TITLE VI/LEP DOCUMENTATION

Which language required translation? __________________________________________

Were you able to successfully assist the individual today? YES NO

Which language required translation? __________________________________________

Were you able to successfully assist the individual today? YES NO
NOTICE 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 A) 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 has been 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 Spanish-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 will mail/email copies of its LEP Policy and seek input from local organizations who serve the LEP population (list shown on Page 23), 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 will consider additional notification options in the future, especially those suggested from within the local LEP community.

MONITORING & UPDATING THE LEP POLICY

The Macatawa Area Express Transportation Authority’s Limited English Proficiency Policy has been designed to be flexible and can be easily updated as needed. At a minimum, the LEP Policy will be evaluated and updated on a tri-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.

PUBLIC PARTICIPATION & DISSEMINATION OF THE LEP POLICY

Community outreach is a requirement of Title VI. Recipients and sub-recipients shall seek out and consider the viewpoints of minority and low-income populations in the course of conducting public outreach.
The Macatawa Area Express Transportation Authority has made the following outreach efforts:

- **Authority Board Meetings:** Board meetings are held monthly and the public is invited to attend; a comment period is regularly scheduled.
- **Local Advisory Council:** The LAC meets nine times annually. Membership is made up of persons from the community and users of public transportation. The public is additionally invited to attend; a comment period is regularly scheduled.
- **Language Outreach:** Spanish-language service schedules and informational brochures are provided. Additionally, at least one Spanish-speaking phone operator is available at the main call center on a regular basis.

Additionally, more directly targeted efforts utilized by the Authority include:

- **Customer Comment/Complaint Process:** Persons may call the main MAX phone number at 355-1010 to place a formal complaint, or to comment on current, proposed, or recommended service changes. Forms are made available on all transit service vehicles, at the main office, and on the agency website.
- **Neighborhood/Residential Center Meetings:** Attendance at special gatherings or as part of regular neighborhood meetings (e.g., Heights of Hope) have been used to gauge service needs or to communicate or seek feedback from residents on transit-related information or proposals.
- **Public Transit Surveys:** Both general awareness and customer surveys are conducted—at a minimum—on a tri-annual basis. Surveys help identify commonality and service needs based on the demographic background (collected simultaneously), assisting in the development of improved services.

**MONITORING OF SUB-RECIPIENTS**

To ensure that sub-recipients are complying with the DOT Title VI regulations, primary recipients must establish a means to monitor their sub-recipients for compliance with the regulations of 49 CFR 21.9(b). Importantly, if a sub-recipient is not in compliance with Title VI regulations, then the primary recipient is also not in compliance.

At the present time, the Macatawa Area Express Transportation Authority does not utilize sub-recipients for transit services. Should sub-recipients be utilized in the future, the Authority—as a primary recipient—shall develop a schedule of sub-recipient LEP submissions and see that all other required processes are enacted and monitored to ensure full LEP compliance.

**GENERAL LEP POLICY INFORMATION**

The MAX Transit LEP Policy is posted on the website [www.catchamax.org](http://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 Policy will be emailed to local community organizations serving LEP individuals.

The 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 Policy should be directed to:

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

Phone: 616.928.2494
Fax: 616.928.2467

Email: c.veldhoff@catchamax.org