

TITLE VI
LIMITED ENGLISH PROFICIENCY
LANGUAGE PLAN



Plymouth Metrolink

March 2023

ABOUT PLYMOUTH METROLINK

In 1984, the Plymouth City Council exercised its legal right and approved a Plymouth transit authority separate from regional transit authority. The Plymouth Metrolink transit system provides express commuter bus service, reverse commuter bus service, local fixed route service, and Click-and-Ride, a shared curb-to-curb service. Plymouth Metrolink fixed route is the greatest portion of the service.

Fixed route buses provide an average of 1,944 rides each weekday to residents. Express commuter services connect riders between Plymouth, downtown Minneapolis, and the University of Minnesota on weekdays. Metrolink also provides reverse commuter service between Plymouth and downtown. Fixed local shuttle buses travel through neighborhoods, to and from express service stops, transit hubs, and between local destinations.

Plymouth Metrolink Click-and-Ride service provides an average 130 shared rides each weekday and about 40 daily rides on weekend. Click-and-Ride is a shared, curb-to-curb, demand response service available to everyone for \$3.00 per ride. The Plymouth Metrolink Click-and-Ride service is available weekdays from 6 a.m. to 8:30 p.m., Saturday 6 a.m. to 6:30 p.m., and Sunday 7 a.m. to 6:00 p.m. within Plymouth and to select destinations and transit hubs such as Ridgedale Mall and Wayzata.

All Plymouth Metrolink buses are wheelchair accessible and have wheelchair lifts and bike racks. The Plymouth Metrolink fleet consists of 44 buses, which are operated and maintained for the city under contract by First Transit. Plymouth Metrolink facilities and amenities are operated and maintained by the City of Plymouth.

LANGUAGE ASSISTANCE PLAN

A Limited English Proficiency (LEP) person is one who does not speak English as their primary language, and who has a limited ability to read, speak, write, or understand English.¹ Recent immigrants to the United States, including those persons who speak English, use public transportation at higher rates than those who were born in the U.S.² However, an immigrant's use of public transit tends to decrease with their length of residence in the United States.³ Many immigrants switch from transit to personal vehicles because they view a personal vehicle as a symbol of assimilation, and because a personal vehicle provides greater mobility or access to economic and social opportunities beyond a transit system's service area.⁴ Recent immigrants elect to continue using transit if their experience with public transportation is positive.⁵ For transit agencies seeking to increase the number of "choice riders," it may be easier to retain riders who have had positive impressions of the system, than to attract people who have never used, or rarely used public transit.

¹ LEP Executive Order 13166, August, 2000

² The U.S. Department of Transportation Federal Transit Administration Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers; April 13, 2008, p. 5.

³ Ibid.

⁴ Ibid.

⁵ Ibid.

Agencies that provide language assistance to LEP persons in a competent and effective manner will help ensure that their services are safe, reliable, convenient, and accessible to those persons. These efforts may attract riders who would otherwise be excluded from participating in the service because of language barriers and should encourage riders to continue using the system after they are proficient in English and/or have more transportation options. Catering to LEP persons may also help increase and retain ridership among the agency's broader immigrant communities in two important ways:

- Agencies that reach out to recent immigrant populations to conduct a needs assessment and prepare a language implementation plan (pursuant to U.S. Department of Transportation LEP Guidance) send a positive message to these persons that they are valued; and
- Community outreach designed to identify appropriate language assistance measures can also assist the agency in identifying the transportation needs of immigrant populations and ensuring that an agency's transit routes, hours and days of service, and other service parameters are responsive to the needs of these populations.⁶

Background Information/Purpose

The Language for LEP Persons can be a barrier to accessing important benefits or services, understanding, and exercising important rights, complying with applicable responsibilities, or understanding other information. This Title VI Limited English Proficiency Language Assistance Plan for the Metrolink establishes the Plymouth Metro link's commitment to ensure access to all individuals who would like to use Plymouth Metrolink services. Furthermore, this plan guides Metrolink staff who interact with LEP individuals.

For questions or to request translation of this document, please contact the Title VI Manager:

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Plan

The City of Plymouth Transit Program has developed this Limited English Proficiency Language Plan to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to Plymouth Metrolink services including Commuter Express, Reverse Commuter Express, Local Fixed Route, Click-and-Ride shared ride, and other transportation services as required.⁷

⁶ The U.S. Department of Transportation Federal Transit Administration Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers; April 13, 2008, p. 5.

⁷ Executive Order 13166, Limited English Proficiency (LEP), August, 2000.

LEP Definition

A LEP person is one who does not speak English as a primary language and who has a limited ability to read, speak, write, or understand English. For the purposes of this LEP language plan, LEP persons are Plymouth Metrolink riders or potential riders, and the people who live and work with the riders and potential riders.

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

- Number or proportion of LEP persons eligible in the Plymouth Metrolink service area likely to encounter a Plymouth Metrolink program, activity, or service;
- Frequency with which LEP individuals come in contact with Plymouth Metrolink services;
- Nature and importance of the Plymouth Metrolink program, activity or service provided to the LEP population and resources available to Plymouth Metrolink; and
- Overall cost to provide LEP assistance.

A description of these considerations is provided in the Section V of this plan.

Community Outreach

The City of Plymouth conducts community outreach efforts to engage the public in planning and decision-making processes, as well as marketing and outreach activities such as attending annual citywide public outreach events.

In order to ensure that we are serving all of our customers, Plymouth Metrolink is focusing outreach to minorities, new immigrants, people of color and low income populations. One way in which Plymouth Metrolink does this is through working with Interfaith Outreach & Community Partners which is a social service agency in Plymouth that works on outreach of above said communities. We provide transit materials to this agency so they can include them in their new client packets and make them aware that we are willing to provide translation of all Metrolink materials if needed. We communicate with this agency on all Metrolink service changes and detours.

The following includes details of recent community outreach efforts:

- In March 2022, Plymouth Metrolink Story was published on a local newspaper Sun Sailor.
- In April 2022, Plymouth Metrolink attended “Discover Plymouth” a community event where local vendors, city departments and elected officials engage with the community and provide information about city services. This was held on a Saturday morning at the Plymouth Community Center.
- Metrolink customer service line staff and City Hall front desk staff are prepared to provide translation services through Language line/MNIT.
- We state on our flyers that translation of materials are available for anyone who requests them. Our goal is to have the availability of translation stated on all our printed and online materials.

- The City Transit Division tracks requests for service in a customer service log. Information on complaints may be reviewed by the public upon request and in compliance with the MN Data Privacy Act.
- When a major change to an existing service or new service is proposed, the City of Plymouth conducts community outreach efforts to engage the public in planning and decision-making processes, as well as marketing and outreach activities.
- Citizens and passengers may contact Plymouth transit staff or contracted staff to file a complaint or comment. All complaints and comments are input into the customer service log, distributed as appropriate, and resolved. These issues are reviewed as received.
- The Plymouth Metrolink page on the City of Plymouth web site has transit information including: policies, maps, schedules, news, rider alerts, links, and meeting notices. This section clearly states contact information for the City of Plymouth and lists the “Commitment to Fairness” policy. All this information is also located on all Plymouth Metrolink buses and in facilities.
- The City of Plymouth has an eNotify sign-up system on the city web site for people to receive email updates on transit information, weather emergencies, new maps and schedules, new policies, news, rider alerts, and meeting notices.
- Transit rider alerts, surveys and other information are directly distributed to passengers on buses by the drivers, posted at transit stations, park and ride lots, bus shelters and city facilities. The rider alerts and other information are also distributed electronically.
- In addition to the transit stations, the Plymouth Metrolink bus schedules and maps are distributed in public places including all city facilities, the downtown area, Interfaith Outreach Community Partners and at the Metro Transit locations in downtown Minneapolis and on the Metro Transit web site.
- Plymouth Metrolink contact information, the city web site, and the “Commitment to Fairness” policy are included on every schedule.
- Annually in the fall, the city conducts a thorough on-board passenger survey of fixed route and Click-and-Ride program, service, fleet, and facilities. Any passenger comments are listed separately and reviewed by the appropriate city staff person. Passengers are offered many ways in which to submit their surveys, opinions, and comments (on the bus, email, fax, phone, walk, mail).
- The Plymouth Metrolink buses are present, and staff participates in city and community events, including the spring event City Sampler, the summer event Music in Plymouth, and Night to Unite.

Four Factors

This Limited English Proficiency Plan has been prepared to address the City of Plymouth’s responsibilities as a recipient of federal transit funds as they relate to the needs of individuals with limited English language skills accessing the transit services offered by the City of Plymouth.

This LEP Plan identifies reasonable steps for providing language assistance to LEP people who wish to access Plymouth Metrolink transit services. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English.⁸

⁸ Ibid.

The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42. 2000d, et. seq., and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin. Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination.⁹

This Executive Order directs each federal agency to publish guidance for its respective recipients clarifying recipients' obligations to ensure that such discrimination does not take place.¹⁰ This Executive Order applies to all state and local agencies which receive federal funds relating to services and facilities, and thus includes the City of Plymouth through the Plymouth Metrolink buses and facilities. This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

In order to prepare this plan, the City of Plymouth conducted the following U.S. Department of Transportation four factor LEP analysis. The number or proportion of LEP persons in the service area who may be served or are likely to encounter the City of Plymouth program, activity or service. The frequency with which LEP persons come in contact with the City of Plymouth programs, activities or services. The nature and importance of programs, activities or services provided by the City of Plymouth to the LEP population. The resources available to the City of Plymouth and overall cost to provide LEP assistance.

This LEP Plan includes: The results of the four-factor analysis, including a description of the LEP population(s) served by Plymouth Metrolink transit program, a description of how the city provides language assistance services, a description of how the city provides notice to LEP persons about the availability of language assistance.

Four Factor Analysis

The City of Plymouth developed its LEP Plan as outlined below based on this four-factor analysis.

The Number or Proportion of LEP Persons Served

The first factor is the number or proportion of LEP persons in the service area eligible to be served or are likely to encounter a City of Plymouth program, activity, or service. For Plymouth Metrolink, this is anyone eligible to ride the Plymouth Metrolink transit system for the rate charged, or, if a person meets certain criteria they may qualify for a reduced fare. The City of Plymouth staff reviewed the population estimates for Plymouth as prepared by the Metropolitan Council and based upon the 2013-2017 American Community Survey. For the purposes of this analysis, the service area for Plymouth Metrolink is considered the City of Plymouth.

⁹ Executive Order 13166, Limited English Proficiency (LEP), August, 2000

¹⁰ Ibid.

In 2020, the population of Plymouth was 81,181 According to the 2020 American Community Survey (ACS), 17.2% of the Plymouth population (12,722 residents) indicated they speak a language other than English in the home (Chart 1).

The Frequency with which LEP Persons Encounter the Program

The second factor is the frequency with which LEP persons encounter transit programs, activities, or services. To assess the frequency transit staff interacts with LEP persons, city staff surveys all Plymouth Metrolink riders annually during one week in the fall. The survey is also distributed to seniors at the Plymouth Creek Center and to the Adult Education classes at Wayzata Central Middle School. Bus drivers ask passengers to place completed surveys in a special enclosed plastic box on the bus or communicate responses to transit staff at City Hall.

Plan Plymouth Metrolink surveys

The surveys are presented on-line or on a two-sided sheet of paper, and only in English. Paper surveys are distributed on the buses with pencils. The completed surveys are accepted on the bus in a secured box when the passengers exit the bus, and through the next week via fax, by email, by mail, by phone and in person. Respondents wrote their own languages in blanks provided in the survey. In 2014 and beyond, these surveys will be offered in the predominant languages indicated for Plymouth riders. In the future, surveys will be offered to the public in alternative languages. To date, there has been no request for a translated survey form.

Of the 32 Plymouth Metrolink Click-and-Ride surveys returned in 2019, 93.75% reported English to be their primary language.¹¹ 6.25% said they speak Hindi. Out of 493 the Fixed Route surveys returned, 92.29% reported English, 1.22% of respondents answered Spanish, 2.03% answered Hindi as their primary language. While the Plymouth Hindi speaking Indian population is increasing, Hindi is one of the main languages spoken in India where English is also used as an official language by their central government. We believe this is why we are not receiving translation requests from the Hindi speaking population of Plymouth. See Language Spoken at Home analysis below.

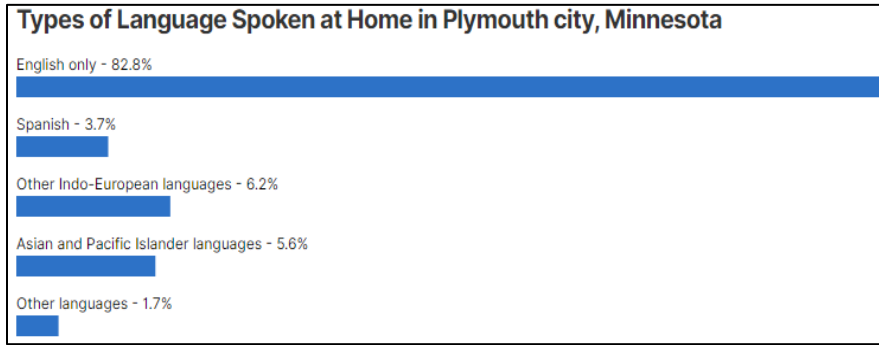
In the US census population language data,¹² there are two summary categories in Plymouth that required additional analysis to determine if the threshold prescribed in the Safe Harbor Act of 1,000 or 5% has been met in Plymouth.

We investigated two data sets from the US census bureau. Data set C16001 languages spoken at home by residents of Plymouth for the past 5 Years, and Census data Public Use Microdata Areas PUMA which provides data for a larger area adding other cities see map. Hennepin County--Plymouth, Maple Grove (West) & Medicine Lake Cities.

¹¹ Plymouth Metrolink Click-and-Ride Survey, 2020

¹² .LANGUAGES SPOKEN AT HOME FOR THE POPULATION 5 YEARS AND OVER Universe: Population 5 years and over more information.

Chart 1 – City of Plymouth, Languages spoken at home.



Our analysis according to this census data shows that there are no significant numbers of the population of the languages in these two summary languages, Asian and Pacific Island and Other Indo-European languages in Plymouth that meet the safe harbor provision threshold.

Therefore, we will continue to provide Transit customer communication materials in English only. The City of Plymouth will continue to make translation services available when requested, using resources available through the State of Minnesota.

Chart 2 – Other Indo-European Languages

Northern Frisian (frr)
Western Frisian (fry)
Icelandic (isl)
Faroese (fao)
Belgium N.E.C.
Occitan (post 1500)(oci)
Catalan (cat)
Aromanian (aen)
Ladin (lld)
Romansh (roh)
Welsh (cym)
Breton (bre)
Cornish (cor)
Manx (glv)
Scottish Gaelic (gal)
Scots (sco)
Belarusian (bel)
Lower Sorbian (dsb)
Upper Sorbian (hsb)
Kashubian (csb)
Silesian (szl)
Slovenian (slv)

Chart 3 – Asian and Pacific Island Languages

Chinese (incl. Mandarin, Cantonese)	Mandarin Chinese, Min Nan Chinese (incl. Taiwanese), Yue Chinese (Cantonese)
Japanese	Japanese
Korean	Korean
Hmong	Hmong
Vietnamese	Vietnamese
Khmer	Central Khmer (Cambodian)
Thai, Lao, or other Tai-Kandai languages	Thai, Lao
Other languages of Asia	Burmese, Karen, Turkish, Uzbek
Tagalog (incl. Filipino)	Tagalog, Filipino
Ilocano Samoan, Hawaiian, or other Austronesian languages	Cebuano (Bisayan), Hawaiian, Iloko (Ilocano), Indonesian, Samoan

Of the 493 Plymouth Metrolink fixed route commuter surveys returned in 2019, 7.7% of respondents (38 riders) speak a language other than English at home.¹⁴ For 92.29% riders (455), English is their primary (or only) language.¹⁵

The four language areas other than English spoken in the home by a majority of the commuter survey respondents are listed below.¹⁶ Hindi, Spanish, Telugu and Tamil.

All languages indicated by respondents in the 2019 Plymouth Metrolink ridership surveys are listed in Chart 3 and Chart 4.

Chart 4 –2019 Plymouth Metrolink Fixed Route Survey Respondents Who Speak a Language Other Than English at Home.

English	455	92.29%
Hindi	10	2.03%
Spanish	6	1.22%
Telugu	6	1.22%
Tamil	5	1.01%
Amharic	3	0.61%
Chinese	2	0.41%
Russian	2	0.41%
Hmong	1	0.20%
Malayalam	1	0.20%
Vietnamese	1	0.20%
Romanian	1	0.20%
Total Responses	493	100.00%

Chart 5 –2019 Plymouth Metrolink Dial-a-Ride Survey Respondents Who Speak a Language Other Than English at Home.

English	15	93.75%
Hindi	1	6.25%
Total Responses	16	100.00%

Staff maintains an electronic Customer Service Log to track all requests and a field in the Customer Service Log tracks LEP requests specifically. The Customer Service Log does not indicate any requests for LEP assistance received by city transit staff.

The Nature and Importance of the Program

The third factor is the nature and importance of the program, activity or service provided by Plymouth Metrolink to the LEP population. There is no single large geographic concentration of LEP group living in the Plymouth service area. The majority of the residential and school population in Plymouth and the surrounding communities speak primarily English.

Plymouth Metrolink provides LEP services to anyone who requests it. Plymouth provides as much information as possible in graphic or numerical form. Information is also provided online, verbally by phone and in person, and through a Telecommunication Device for the Deaf (TDD) service.

The Resources Available and Cost to Recipient

The fourth factor is resources available to Plymouth Metrolink for LEP outreach, and the overall costs to provide LEP assistance and outreach. Currently, the City of Plymouth has a Telecommunication Device for the Deaf (TDD) phone line published and available for use by anyone. The line is intercepted by an operator who works with a TTY (teletype terminal) that lets people who are deaf, hard of hearing, or speech-impaired communicate via telephone through synchronized conversation. It is similar to digital (cell) texting, although the land lines at City Hall do not have digital text capabilities.

The City of Plymouth assessed its available resources that could be used for providing LEP assistance, and has determined:

- The City of Plymouth has narrowed down the options to assist LEP individuals to utilize Plymouth Metrolink Click-and-Ride transit services, commuter express routes, and local fixed routes.
- Professional interpreter and document translation services will be provided as needed or requested, given the overall low percentage of LEP persons within the City of Plymouth service area.

As can be seen in our rider survey, there are 11 non-English languages spoken in Plymouth. These are very small percentages.

LEP Plan Based Upon the Four Factor Analysis

The City of Plymouth developed its LEP Plan as outlined above on the four-factor analysis and although there are 11 non-English languages spoken in Plymouth, with very small percentages, the City of Plymouth has narrowed down the options to assist LEP individuals to utilize Plymouth Metrolink Click-and-Ride transit services, commuter express routes, and local fixed routes.

Language Assistance Measures

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

- The City of Plymouth Title VI Program and Limited English Proficiency Plan is posted on the city web site at plymouthmn.gov/CommitmentToFairness.
- The City of Plymouth Title VI Policy and Limited English Proficiency Plan is posted at all transit facilities and in all buses.
- When an interpreter is needed, in person or on the telephone, staff will attempt to determine what language is required and then access language assistance service. A translated document is available to generate such assistance. Dispatchers, managers and those who frontline staff are aware of the availability of translation services if needed.

Staff Training

The following training will be provided to the City of Plymouth staff that is directly involved with the transit services:

- Information on the City of Plymouth’s Title VI Policy and LEP responsibilities.
- Description of language assistance services offered to the public.
- Documentation of language assistance and document translation requests via the customer service log.
- Proper Handling of a Title VI/LEP Complaint according to the Title VI Complaint Procedures.

Outreach Techniques

- In its outreach effort, Plymouth Metrolink monitors customer service logs, annual passenger’s surveys, work with Interfaith Outreach, and the Northwestern Islamic Community Center in order to see if there is need for language assistance.
- Metrolink customer service line staff and City Hall front desk staff are prepared to provide translation services through Language line/MNIT if needed. Staff has yet to use this service.
- Metrolink states on its materials that translation is available if requested. Furthermore, when staff attends a meeting which consist of primarily LEP individual’s staff asks if they need translation assistance. There has not been any request for translation since 2016.

Monitoring and Updating the LEP Plan

The LEP Plan will be reviewed and updated as needed and as required by the Metropolitan Council and the U.S. Department of Transportation. The plan was reviewed and updated using 2020: ACS 5-Year Estimates Data, City of Plymouth will continue to monitor LEP population number based annual rider survey and US Census data.

Dissemination of the City of Plymouth LEP Plan

The City of Plymouth's LEP Plan is available at plymouthmn.gov/CommitmentToFairness.
The Title VI Program is available at plymouthmn.gov/CommitmentToFairness.

Any person or agency may contact the City Clerk to request a copy of the plans. In addition, the City of Plymouth will, if possible, provide translations of its title VI program, LEP plan or any of its materials if requested. Any person or agency may request a copy of the plan via telephone, fax, mail, or in person, and shall be provided a copy of the plan at no cost. LEP individuals may request a translated copy of the plan which the City of Plymouth will provide, if feasible.

If you need translation services, please contact Metrolink at transit@plymouthmn.gov or call 763-509-5535