

Wadena County Friendly Rider



Limited English Proficiency Four-Factor Analysis

Date: 9/1/23

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Briefly describe the program or activity subject to analysis:

Title VI and its regulations require sub recipients to take reasonable steps to ensure meaningful access to the transportation system's information and services. The four-factor analysis is an individualized assessment that should be applied to all transportation system programs and activities to determine what reasonable steps must be taken to ensure meaningful access for LEP individuals. This population will be program-specific and includes people who are in the Transit system's geographic area.

It is Wadena County Friendly Rider's intent to have an entirely functional language access plan that will satisfy federal requirements. Wadena County Friendly Rider conducted a LEP four factor analysis, which is outlined below. The results of the LEP four factor analysis will be reviewed annually to help identify the needs of the LEP populations served.

The LEP four factor analysis demonstrates that there may be need for meaningful access to engage LEP populations, Wadena County Friendly Rider works with Language Line. Language Line provides telephone-based, on-demand access to language interpreters 24 hours a day, 7 days a week, year-round. The service assists staff in communicating effectively with LEP individuals.

Wadena County Friendly Rider determines that vital documents are paper or electronic written material containing information that is (1) critical for accessing programs, services, benefits, or activities, (2) directly and substantially related to public safety, or (3) required by law. Wadena County Friendly Rider uses requests and recommendations from the public and tracks the concerns of the need for the vital documents requiring translation. At this time, Wadena County Friendly Rider has not received any specific needs for translation of vital documents.

Factor #1: The number or proportion of LEP persons eligible to be served or likely to be encountered through the program or activity?

The greater the number or proportion of LEP individuals from a particular language group served or encountered in the eligible service population, the more likely language assistance services are necessary. Ordinarily, “individuals eligible to be served or likely to be encountered” by a program or activity are those who are in fact, served or encountered in the eligible service population. This population will be program-specific and includes people who are in the Transit system’s geographic area.

Wadena County Friendly Rider first examined prior experiences with LEP individuals and determined the number and proportion of LEP persons served or encountered within the service area. Wadena County Friendly Rider also included LEP populations that are eligible to be served or likely to be affected or encountered.

To support the efforts of conducting the four-factor analyses, Wadena County Friendly Rider referred to the data compiled from the [MnDOT’s LEP Data Tool](#) for our system’s jurisdiction of services at the city and county-level attached as Appendix B.

Primary Languages for Transit System County Programs or Information

The data provided in Appendix B identified English, Other Unspecified, and Spanish languages as the top LEP groups in the jurisdiction providing service.

Friendly Rider serves the County of Wadena and portions of Todd, Ottertail, and Morrison. This is due to the demographic of county boundaries and the location of city of Wadena-county seat of Wadena County. Total city populations of:

Wadena/Deer Creek/Staples/Motley/Bertha/Hewitt/Eagle Bend/Browerville/Aldrich/Verndale Bluffton/New York Mills/Sebeka/ and Menahga.

Counties (City) served: All of Wadena, Portions of Todd, Ottertail, and Morrison

Total county/counties population: Wadena: 13,843, Todd: 24,895, Ottertail: 57,303 Morrison: 34,010 for a Total County Population of: 130,051

The total number of LEP individuals in our service area is: 129

The total eligible population in our service area is (cities served): Wadena: 4,352, Deer Creek: 331 New York Mills: 1,301 Bluffton: 213 Sebeka: 749 Menahga: 1,344 Verndale: 516 Aldrich: 33 Staples: 3,038 Motley: 685 Bertha: 554 Hewitt: 248 Eagle Bend: 542 Browerville: 831 for a total Eligible Population of 14,737

The proportion (percentage) of LEP population to the total eligible service population is: 9%

Reliable External Data Sources for Identifying LEP Groups

Wadena County Friendly Rider used reliable external data sources to determine the number or proportion of individuals eligible to be served or likely to be affected or encountered based on the expected geographic area served (ie. city, county, regional area, etc.)

Reliable external data sources included:

[MnDOT’s LEP Data Tool](#): Allows sub recipients to identify LEP language groups by county, city, and school district. Webpage includes further details about how to use the tool.

[American Community Survey](#): An annual survey conducted by the U.S. Census Bureau providing vital demographic information and is widely considered the most reliable source of detailed information about the United States population.

[Minnesota Compass](#): A Wilder Research project providing Minnesotans with credible, user-friendly data about their communities.

- [EJSCREEN](#): A mapping tool created by the U.S. Environmental Protection Agency based on nationally consistent data and an approach that combines environmental and demographic indicators in maps and reports. The functions include automated demographic reporting for a geographic area around an identified project area.
- [MN State Demographic Center](#): Provides data and reporting on various topics, including language and immigration.

In addition to identifying and examining prior experiences with LEP individuals and the external data sources outlined above, Wadena County Friendly Rider looked at local data resources to determine the number or proportion of LEP individuals who may be eligible to be served. These include: (narrative under selected box in Italics)

- Survey results:

Describe:

- Locally Coordinated Human Services/Transit Plan

Participated on a subcommittee providing ridership data for Region 5 Local Coordination Plan in 2022.

- Other Human Services data

- Area/Metropolitan Planning Organizations/Regional Development Commission data

- Information from local organizations (religious, legal, social service, etc.) about LEP persons in our service area

Works closely with Wadena County Human Services and Todd County Human Services-TAC participation from Religious Organizations and County(s) entities.

- Reports from drivers, dispatchers, and others about contact with LEP persons

Quarterly Staff meetings along with a Staff Suggestion Box on incidents/questions that arise from day to day operations.

- Other information:

Describe:

[Safe Harbor for Written Translations](#)

U.S. DOT LEP Guidance provides a “safe harbor” to help ensure greater clarity regarding whether Wadena County Friendly Rider is meeting its obligation to provide written translations. These provisions only apply to the translation of written documents and do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language assistance services are needed and reasonable.

The following actions by Wadena County Friendly Rider are considered as meeting the compliance with the written-translation obligations:

(a) Providing written translations of vital documents for each eligible LEP language group that constitutes 5% or 1,000 people, whichever is less, of the population of individuals eligible to be served or likely to be affected or encountered. Translation of non-vital documents, if needed, can be provided orally; or

(b) If there are fewer than 50 individuals in a language group that reaches the 5% trigger in (a), the vital written materials are not translated, but written notice of the right to receive free, competent oral interpretation of those vital written materials in the primary language of the LEP language group of is provided.

Failure to meet the actions provided does not mean there is noncompliance, but rather provide a resource to obtain greater certainty of compliance with a fact-intensive, four-factor analysis. Generally, it would not be necessary to translate vital documents when it would be so burdensome as to defeat the legitimate objectives of a program. Other ways of providing meaningful access, such as effective oral interpretation of certain vital documents, might be acceptable under such circumstances.

The findings from the graphs within Appendix B did not indicate any LEP language groups meet the safe harbor threshold. At this time, Wadena County Friendly Rider will not translate written documents. However, efforts will be made to reasonably accommodate any language access requests that may arise.

Factor #2: The expected frequency with which LEP individuals will interact with the program, activity, or service?

Wadena County Friendly Rider conducts an assessment process, as accurately as possible, to obtain updated information on the frequency with which the Transit system would have or should have contact with LEP individuals from different language groups seeking assistance. The assessment is completed on an annual basis, by survey and/or outreach efforts such as TAC meetings and Board of Commissioner meetings. In determining the needs, emphasis is placed on populations that will have frequent contacts for services, while less frequent or unpredictable service contact needs will require less intensified solutions. Less intensified solutions could be as simple as being prepared to use telephone interpretation services for immediate interpreter services or the use of staff person who can translate for the parties. At all times, Wadena County Friendly Rider will look for opportunities to increase their outreach efforts to all LEP language groups.

No reports have been made from Transit staff in regards to requests by LEP persons for transit services. Current high volume of use for transit destinations are Clinics, Day Activity Centers, and shopping areas that provide food related items. It is the intent of Wadena County Friendly Rider to work closely with these destinations as well as Human Services in the area counties.

LEP persons may interact in several ways other than for public transit trip opportunities, with Wadena County Friendly Rider including but not limited to:

- Public meetings
- Community events
- Project-specific meetings, events, and discussions
- Online engagement
- Walk-in requests for information
- Phone communications
- Customer service interactions
- Surveys for information

In conducting our most recent review on July of 2022, Wadena County Friendly Rider has not had interactions with the following LEP language groups in the past 3 years: No reports have been brought forth at Wadena County Board meetings or at TAC meetings. During quarterly staff meetings Wadena County Friendly Rider staff have not reported any incidents.

Wadena County Friendly Rider will document over the next 3-year period, the frequency in which LEP individuals from different language groups come into contact with Wadena County Friendly Rider programs, activities, or services. In using the LEP MnDOT Data tool along with County, TAC, and Staff meetings it is determined no language assistance at this time. Wadena County will continue to monitor through documentation when need presents.

Factor #3: The nature and importance of the program, activity, or service provided by the program to the people's lives?

The obligations to communicate rights to LEP individuals who need access to services or information is a priority in meaningful transportation. Wadena County Friendly Rider has identified programs or activities that would have serious consequences to individuals if language barriers would prevent a person from benefiting from the service. In using the LEP MnDOT Data tool along with County, TAC, and Staff meetings it is determined no language assistance notification at this time. If language assistance needs become relevant through statistical information or documentation emergency evacuation instructions in vehicles and facilities, security awareness or emergency preparedness information in vehicles and at facilities will be accessible. Flyers will be placed in transit facilities as well as electronic notices will be placed on our busses through media on TV's.

Our transit system considers transit to be an important and essential service for many people living in our service area. Wadena County Friendly Rider works with the community organizations, such as area County Human Services, TAC meetings, and County Board meetings to provide opportunities for access and information to public transit services. In our efforts we regularly have quarterly TAC meetings and three times a month County Board Meetings to assist with outreach. LEP persons may use our transit service to travel to Health Care Facilities, County Service Offices, Day Activity Centers, Mental Health Centers, and Grocery Stores.

Wadena County Friendly Rider has determined the impact on actual and potential beneficiaries of delays in the provision of LEP services by when information or services are not accessible to people with limited English proficiency, or if language services in these areas is delayed through trip denials and or on time performance affecting access to services. Collection of this information will be documented.

Within our analysis, Wadena County Friendly Rider will identify necessary language assistance measures, including the translation of vital documents into an identified LEP population that seeks services or information on a regular basis and is likely to be affected. Vital documents are paper or electronic written material that contains information that is 1) critical in accessing programs, services, benefits, or activities, 2) directly related to public safety, or 3) required by law. Determining whether a document or the information is "vital" may depend on the importance of the information or service involved and the consequences to the LEP individual if the information is neither accurate nor timely.

Examples of vital documents in the U.S. DOT LEP Guidance include:
Emergency transportation information
Notices advising LEP individuals of free language assistance
Instructions on how to participate in a program or activity or receive service

Because no languages were identified as meeting the safe harbor threshold for translating vital written materials, Wadena County Friendly Rider is not at this time providing a list of documents considered vital. Should future analysis indicate an LEP group meeting the safe harbor threshold, Wadena County Friendly Rider will evaluate its vital documents and provide translations in accordance with the analysis and federal guidance.

Factor #4: The resources available to the public for LEP outreach, as well as the costs associated with providing meaningful language access.

Wadena County Friendly Rider does not have sufficient resources to ensure meaningful access and will be evaluating options for increasing language assistance.

To ensure consistent and ongoing analysis Wadena County Friendly Rider creates an annual list of specific measures that are needed to ensure meaningful access to its programs and activities. When data meets the threshold or documented records prove the need for Language Assistance, Friendly Rider will:

- Language Cards on Busses
- Language Cards digitally on TVs
- Title VI in Language(s) on TVs in busses
- Language Cards at facility
- Digital TV in facility identifying Language assistance
- Language Assistance Hotline

Findings: What language assistance measures will you need to employ to ensure meaningful access to LEP individuals:

Based on the analysis above, how important will language assistance be to this program or activity?

- Not Important (little to no LEP population)
- Important (some LEP population)
- Very Important (significant LEP population)

What non-English languages are most prevalent in your service area? What are the numbers and percentages for each, based on total populations?

The data provided in Appendix B identified English, Spanish, and Chinese Mandarin languages as the top LEP groups in the jurisdiction providing service. The proportion (percentage) of LEP population to the total eligible service population is: 1%

Based on the findings of most prevalent non-English languages, will you need to translate documents for any or all of the identified populations?

Because no languages were identified as meeting the safe harbor threshold for translating vital written materials, Wadena County Friendly Rider is not at this time providing a list of documents considered vital. Should future analysis indicate an LEP group meeting the safe harbor threshold, Wadena County Friendly Rider will evaluate its vital documents and provide translations in accordance with the analysis and federal guidance.

If so, what documents would need to be translated?

Not at this time.

Language Identification

One way to determine the language of communication is to use language identification cards (or “I speak cards”), which invite LEP persons to identify their language needs to staff. Such cards, for instance, might say, “I speak Spanish” in both Spanish and English, or “I speak Vietnamese” in both English and Vietnamese. We will have these cards at our dispatch office located in the “How To” Book and the individual will be able to point at the language. Dispatch will then be able to contact the Language assistance hotline.

Below is the language assist card that was located at: [Accessibility Limited English proficiency resources / Minnesota Department of Human Services \(mn.gov\)](https://www.mn.gov/Accessibility/Limited-English-proficiency-resources/)

<p>የአማርኛ አስተርጓሚ አፈልጋለሁኝ።</p> <p>I need an Amharic interpreter.</p>	<p>انا احتاج مترجم عربي</p> <p>I need an Arabic interpreter</p>	<p>Nama Afaan Oromo hiikun barbaada.</p> <p>I need an Oromo language interpreter.</p>	<p>Мне нужен русский переводчик.</p> <p>I need a Russian interpreter.</p>
<p>ကျွန်ုပ်အတွက် မြန်မာဘာသာပြန် လိုအပ်ပါသည်။</p> <p>I need a Burmese interpreter.</p>	<p>我需要粵語口譯人員。</p> <p>I need a Cantonese interpreter.</p>	<p>Waxaan u baahnahay turjubaan Somali ah.</p> <p>I need a Somali interpreter.</p>	<p>Necesito servicios de intérprete en español.</p> <p>I need a Spanish interpreter.</p>
<p>J'ai besoin d'un interprète français.</p> <p>I need a French interpreter.</p>	<p>Kuv xav tau ib tug neeg txhais Lus Hmoob</p> <p>I need a Hmong Language interpreter.</p>	<p>Tôi cần thông dịch viên tiếng Việt.</p> <p>I need a Vietnamese interpreter.</p>	
<p>ယလိန်ဘိယုကတီ၊ကျေးထံကညီကျိတကလီ။</p> <p>I need a Karen interpreter.</p>	<p>ខ្ញុំត្រូវការអ្នកបកប្រែភាសាខ្មែរ</p> <p>I need a Khmer interpreter.</p>		
<p>한국어 통역사가 필요합니다.</p> <p>I need a Korean interpreter.</p>	<p>ຂ້າພະເຈົ້າ ຕ້ອງການ ລ່ານເປພາສາລາວ</p> <p>I need a Lao interpreter</p>		

Language Service / Public Participation Log

Staff Instructions

Wadena County Friendly Rider staff should make an effort to track all language services requested or proactively provided throughout the year. Wadena County Friendly Rider has designated the following staff position to be primarily responsible for ensuring the log is consistently utilized: Randy Jahnke, Transit Director, and contact him at Randy.Jahnke@wcmn.us

Date of Service: This is the date the translation or interpretation service was available to the public. For instance, the date of service for a translated service brochure would be the date of its first distribution to the public. If the same brochure is used multiple times, that can be noted in the Additional Comments column.

Request or Proactive: Select "Proactive" if Wadena County Friendly Rider proactively determined the language services was necessary. Select "Request" if a member of the public requested the language service be provided.

Translation or Interpretation: Translation refers to converting written materials from one language to another and interpretation refers to converting spoken word from one language to another.

Description of Service Provided: The description should include an associated public engagement reference or product title and brief details explaining the service provided (i.e. what was translated, what event/meeting, particular audience, etc.)

Vital Document: A "vital document" is a paper or electronic written material that contains information that is critical for accessing programs, services, benefits, or activities; directly and substantially related to public safety; or required by law. It is at the designated staff discretion to determine whether a document is deemed a vital document.

Service Provider: The name of the qualified language services provider that completed the request through service provider or in-house.

Type of Service Provider: Note whether you used specified staff person, a collaborative partner, or an outreach consultant to complete the language services request. Use the "other" option was used or for unique situations (i.e. bilingual staff providing assistance) and make a note explaining further in the Additional Comments column.

Friendly Rider Language Service/Public Participation

Log

Date of Service:	12/9/2023
Request or Proactive:	Proactive
Translation/Interpretation:	Interpretation
Description:	Training on Language Assistance Hotline Document
Vital Document:	How to Book in Dispatchers Office
Languages:	All Languages
Service Provider:	All Friendly Rider Staff
Type of Service Provider:	Staff Training Video
Additional Comments:	Staff Shown where document in "How to Book"

*After request for Language Assistance a Log will be kept below. No request to Friendly Riders knowledge

Friendly Rider Language Assistance Log:

Date of Service:
Request or Proactive:
Translation/Interpretation:
Description:
Vital Document:
Languages:
Service Provider:
Type of Service Provider:
Additional Comments: