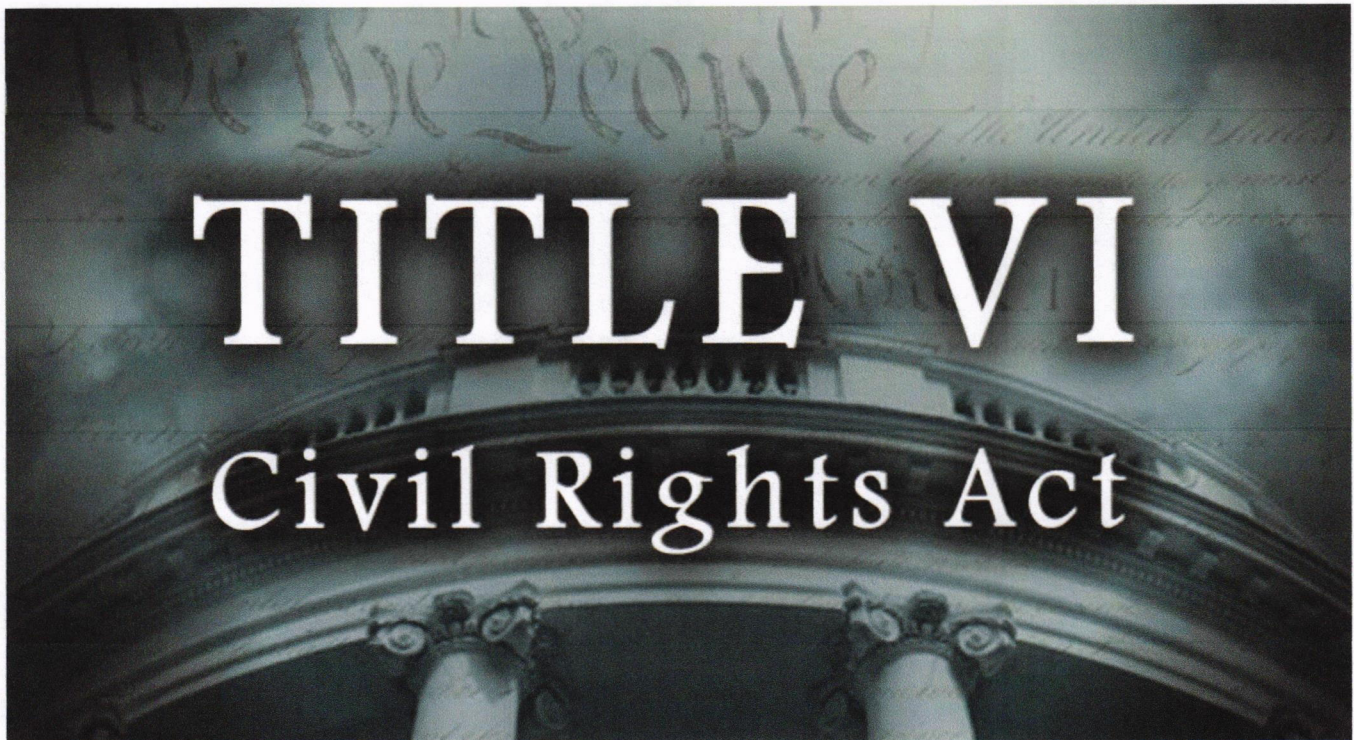


**AEOA, dba Arrowhead Transit**  
**Language Assistance Plan**



**Ensuring Meaningful Access for Limited English Proficient Individuals**

**Effective:**  
**September 21, 2022**

**Revisions: TBA**

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- Appendix G:** Public Notice of Rights under Title VI
- Appendix H:** Title VI Complaint Procedure
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- Appendix J:** Title VI Investigations, Complaints & Lawsuits Log
- Appendix K:** Title VI Non-elected Decision Makers
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## Purpose

The purpose of this Language Assistance Plan (hereinafter "LAP") is to meet Federal Transit Administration's (FTA's) requirements to comply with Title VI of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color, or national origin.

*"No person shall, on grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal assistance." - Civil Rights Act of 1964*

As a subrecipient of FTA funds, AEOA/Arrowhead Transit resolves to take reasonable steps to provide meaningful access to its public transit services for persons who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English. The FTA refers to these persons as Limited English Proficient (LEP) persons. For LEP individuals, meaningful access denotes access that is not significantly restricted, delayed, or inferior as compared to programs or activities provided to English proficient individuals.

The completion of this LAP for persons with Limited English Proficiency conforms to the requirements of the FTA Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients.

The U.S. DOT's FTA Office of Civil Rights' publication "Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons – A Handbook for Public Transportation Providers," dated April 13, 2007, was used in the preparation of this plan.

The LAP provides guidance to AEOA/Arrowhead Transit staff who may interact directly with LEP individuals or whose work involves providing information or services to the public. The plan provides protocols for identifying LEP individuals, language assistance measures, and staff responsibilities and training related to ensuring meaningful access for LEP individuals.

The LAP for AEOA/Arrowhead Transit contains:

- A. A Needs Assessment based on the Four-Factor Analysis
- B. Language assistance measures
- C. A staff training plan
- D. Methods for notifying LEP persons about available language assistance
- E. Methods of monitoring, evaluating, and updating the plan.

For further questions regarding this plan, please contact:

**Cathy Pazzelli**  
**Director of Human Resource**  
**AEOA/Arrowhead Transit**  
**218-748-7350**  
**cathy.pazzelli@aeoa.org**

## Definitions

**Disproportionate Burden:** Refers to a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations. A finding of disproportionate burden requires the recipient to evaluate alternatives and mitigate burdens where practicable.

**Four Factor Analysis:** The assessment provided by federal regulation to help the Transit system determine the level of language assistance required for a program or activity.

**Interpretation:** The act of listening to a communication in one language (source language) and orally converting it to another language (target language) while retaining the same meaning.

**Language Assistance Guide:** Provides an itemized list of non-English languages and can be used as a tool to help an LEP individual identify their preferred language to the Transit system staff.

**Language Assistance:** Oral and written language services needed to help LEP individuals communicate effectively with staff and ensure meaningful access to, and equal opportunity to fully participate in, the programs and activities provided by the Transit system.

**Limited English Proficient (LEP):** Individuals whose primary language is a not English and who have a limited ability to read, speak, write, or understand English. Individuals may be proficient in English for certain types of communication (e.g., speaking or understanding), but still be LEP for other purposes (e.g., reading or writing).

**Meaningful Access:** Language assistance that results in accurate, timely, and effective communication at no cost to the LEP individual. For LEP individuals, meaningful access denotes access that is not significantly restricted, delayed, or inferior as compared to programs or activities provided to English proficient individuals.

**Public Engagement:** Any process that (1) involves the public in identifying and solving challenges and problems and uses public input to make sustainable decisions, (2) educates or informs the public about a topic or issue, or (3) seeks to build meaningful connections and trust with the public through communication and interaction.

**Timely:** Language assistance provided at a time and place that avoids the effective denial of the service, benefit, or right at issue or the imposition of undue burden on or delay in important rights, benefits, or services to LEP individuals.

**Translation:** The replacement of a word, phrase, or text in one language (source language) with an equivalent- meaning word, phrase, or text in another language (target language).

**Vital Documents:** 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.



# Identification of LEP Individuals – the Four-Factor Analysis

Title VI and its regulations require subrecipients to take reasonable steps to ensure meaningful access to the transportation system's information and services. What constitutes reasonable steps to ensure meaningful access is contingent on a four-factor analysis established by the U.S. Department of Justice.<sup>1</sup> 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.

AEOA/Arrowhead Transit has completed the four-factor analysis attached as **Appendix A**. The Analysis is intended to assist in ensuring compliance with federal limited English proficiency guidance and Title VI of the Civil Rights Act of 1964. This analysis does not cover every situation, and compliance determinations are made on a case-by-case basis.

## Safe Harbor for Written Translations

U.S. DOT LEP Guidance provides a "safe harbor" to help ensure greater clarity regarding whether a subrecipient 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.

## A. Language Assistance Measures

Various language assistance services or protocols are necessary to ensure meaningful access to LEP individuals. AEOA/Arrowhead Transit has identified available language assistance services and operational measures where language assistance measures are needed based on the first two factors in the four-factor analysis.

Based on our analysis, AEOA/Arrowhead Transit has determined the importance of language assistance to our programs, activities, or services as:

- A. ☒ Low level (little to no LEP population)
- B. ☐ Mid-Level (some LEP population)
- C. ☐ High Level (significant LEP population)

AEOA/Arrowhead Transit has looked at differing considerations in communicating with LEP populations about transit services and information. The findings from the graphs within Appendix B do not indicate any LEP language groups meet the safe harbor threshold. At this time, AEOA/Arrowhead Transit will not translate written documents. However, efforts will be made to reasonably accommodate any language access requests that may arise.

## Recording Use of Language Assistance Services

AEOA/Arrowhead Transit should make an effort to track all language services requested or proactively provided throughout the year. A template for the Language Service / Public Participation Log is attached as **Appendix E**.

<sup>1</sup> Enforcement of Title VI of the Civil Rights Act of 1964 - National Origin Discrimination Against Persons with Limited English Proficiency, effective August 11, 2000. Available here: <https://www.justice.gov/sites/default/files/crt/legacy/2010/12/14/eolep.pdf>



AEOA/Arrowhead Transit implements a policy to ensure access to services for people with Limited English Language skills. It is the policy of AEOA/Arrowhead Transit to ensure equal access to AEOA Services for all eligible persons. AEOA/Arrowhead Transit will not deny access to services to any eligible person because they do not speak English. Accordingly, AEOA/Arrowhead Transit takes reasonable steps to ensure that persons with limited English proficiency receive the language assistance necessary to allow them meaningful access to services, free of charge, in a way that preserves confidentiality, and in a timely manner. AEOA/Arrowhead Transit disseminates, provides training, and monitors the effectiveness of this policy and applicable procedures.

### Public Engagement/Participation

AEOA/Arrowhead Transit has incorporated Title VI and LEP considerations into an established public participation plan. The Public Participation Plan which outlines the steps our agency follows is attached as **Appendix D**. The attached plan provides a clear process for engaging and involving the public, including minority and LEP populations. Consideration of LEP communities is documented by first using the results of the four-factor analysis that determines the level and type of language assistance necessary for a particular public engagement plan or activity.

The plan aims to seek out and consider the viewpoints of minority, low-income, and LEP populations in the course of conducting public outreach and involvement activities. AEOA/Arrowhead Transit's public participation strategy offers adequate notice of public participation activities, as well as early and continuous opportunities for public review and comments at key decision points to identify social, economic, and environmental impacts of proposed transportation decisions. The plan describes the proactive strategies, procedures, and projected outcomes that align with the public participation activities throughout the year(s). Every effort is made to involve minority and LEP populations in effective participation in our decision-making process. The following practices include, but are not limited to:

- Scheduling meeting at times and locations that are convenient and accessible for minority and LEP communities
- Employing different meeting sizes and formats
- Coordinating with community- and faith-based organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities
- Considering radio, television, newspaper, social media ads on stations, outlets, and in publications that serve LEP populations. Outreach to LEP populations could also include audio programming available on podcasts.
- Providing opportunities for public participation through means other than written communication, such as personal interviews or use of audio or video recording devices to capture oral comments.
- Preparing for public engagement activities by determining ways to provide language assistance when no interpreter is present or whether needed or not, providing written documents in other languages, if requested, including ethnic media, schools, and religious or community organizations to assist in providing information.

Language assistance services provided during public engagement or community outreach may be recorded on the Language Service / Public Participation log, attached as Appendix E. Appendix E will be utilized as required by language assistance requests.

### B. Staff Training

To ensure transit staff, and/or appropriate overall agency staff, understand the obligations to provide meaningful access to information and services for LEP individuals, all employees in public contact positions will



be properly trained. This plan outlines the training provided on an annual, on-going and/or on-demand basis to implement the following:

- Staff have been trained and understand meaningful LEP policies and procedures
- New staff will have appropriate training as part of the orientation for new employees
- Staff who have contact with the public is trained to work effectively with in-person and telephone interpreters
- Management staff, even if they do not interact regularly with LEP individuals, will be fully aware of and understand the plan to reinforce the importance of the program and ensure it is implemented accordingly by/to staff

AEOA/Arrowhead Transit has developed standard presentations, resource connections and other language assistance trainings that provide for cost-effective and flexible opportunities for staff and management to understand the LAP Plan, the Public Participation Plan and responsibilities. Existing employees, especially managers and those who work with the public will be offered re-training or new training sessions to keep up to date on their responsibilities to LEP individuals. The following outlines the information incorporated within the training provided annually, on-going or on-demand:

- Standard presentation provided to new, existing and management on the staff responsibility to LEP populations. Template is used at multiple agency trainings and is updated on a regular and as-needed basis
  - Consistent information will be included on transit agency's responsibilities to LEP populations
  - Summary of Language Assistance Plan
  - Demographic data about local LEP population
  - Frequency of contacts between LEP populations and the transit system's services, programs, and activities
  - The importance of community outreach and inclusion of activities for LEP populations
  - Description of the type of language assistance currently providing and instructions on how staff can access these products and services
  - Description of AEOA/Arrowhead Transit and/or overall agency's cultural sensitivity policies and practices
- Printed LEP resources: understanding the information, how to use information and method in presenting information to LEP populations
- Resources and methods in response to verbal requests for transit service in a foreign language
- Responsibility to notify transit manager about any LEP persons' unmet needs

#### Staff Training Program and Training Log

An outline of the training program, which includes the training title, type of resource (video, presentation, written documents, etc.) and training log (identifies training and training schedule (annually, orientation, on-going, and/or on-demand)) is attached as Staff Training Program and Training Log in **Appendix F**.

- "The Diversity, Equity and Inclusion Journey", Marsh McLennan Agency, Speakers Gary Abernathy, Vice President, Practice Development and Diversity, Equity and Inclusion Practice Leader and Amanda Keys, Culture & Well-being Consultant.
- "Cultural Competency in Schools", Cultural Fluency Associates LLC.
- "Creating a Sustainable Organizational DEI Culture", Malcolm Ratchford, CCAP, PREP, Pathways Consulting.
- "Demystifying the Fundamentals of Diversity, Equity and Inclusion", DEI Training Courses, Accelebrate Consulting.



## C. Notice to LEP individuals

Based on the four-factor analysis, AEOA/Arrowhead Transit has determined that language services will be provided for the LEP populations identified as having a need. For those languages that meet the translation need for written documents threshold based on Safe Harbor guidance, notices will be in the language the LEP individual would understand. For languages that do not meet the written document requirement, based on the Safe Harbor guidance, AEOA/Arrowhead Transit will provide meaningful access to LEP individuals through competent oral interpreters where oral language assistance services are needed and reasonable. All notifications will provide that identified services are available free of charge to LEP individuals.

Examples of notification considered include:

- ☒ Transit intake areas, transfer stations, transit shelters, transit stops, or similar areas  
It is important that LEP individuals can identify how to access language services available to them at initial points of contact
- ☒ Signs on buses
- ☒ Brochures or Pamphlets
- ☒ Targeted Community Outreach events or meetings
- ☒ Telephone messages
- ☒ Local ads (print, radio, TV, social media, billboards)
- ☒ Website notices
- ☒ Information tables/booths at local events, community businesses, schools, and churches
- ☒ Employee Outreach and Recruitment

All facilities where AEOA/Arrowhead Transit interacts with the public in-person will have a Public Notice of Rights Under Title VI posted clearly and conspicuously. At this time, AEOA/Arrowhead Transit will not translate written documents as the safe harbor threshold has not been met. However, efforts will be made to reasonably accommodate any language access requests that may arise. All interactions with LEP individuals will be recorded on the Language Service / Public Participation Log as **Appendix E**.

This Language Assistance Plan and the Notice are available on our website at <https://www.aeo.org/arrowhead-transit>.

## D. Monitoring, Evaluating and Updating Plan

AEOA/Arrowhead Transit has developed a process for determining whether new documents, programs, services, and activities need to be made accessible for LEP individuals and will provide notice of any changes in services to the LEP public and to staff. The process includes an annual review to consider changes in demographics, types of services, or other needs that may require an annual reevaluation. AEOA/Arrowhead Transit will also seek feedback from LEP populations and community outreach programs with follow-up meetings, focus groups and/or with surveys.

The Language Assistance Plan considers the following five elements:

1. Identifying LEP individuals who need language assistance (Four Factor Analysis)
2. Providing language assistance measures
3. Training staff
4. Providing notice to LEP individuals
5. Monitoring, evaluating, and updating the plan

In addition to the five elements, the plan sets clear goals, management accountability, and opportunities for staff and community input and planning throughout the process.



Areas of consideration when monitoring, evaluating and updating include:

- Current LEP populations in the service area or population affected or encountered.
- Frequency of encounters with LEP language groups.
- Nature and importance of activities to LEP persons.
- Availability of resources, including technological advances and sources of additional resources, and the costs imposed.
- Whether existing assistance is meeting the needs of LEP persons.
- Whether staff knows and understands the LEP plan and how to implement it.
- Whether identified sources for assistance are still available and viable.
- Whether staff training is sufficient.
- Review any complaints from LEP individuals received during the past year.

AEOA/Arrowhead Transit is committed to ensuring that no person is excluded from participation in, denied the benefits of, or otherwise subjected to discrimination on the basis of race, color, or national origin by AEOA/Arrowhead Transit, providing programs and services in the following counties: Aitkin, Carlton, Chisago, Cook, Isanti, Itasca, Koochiching, Lake, Pine and St Louis. Persons who allege that a violation to the Title VI requirements has been made may file a Title VI complaint by completing and submitting the Title VI Complaint Form to AEOA/Arrowhead Transit and/or to MnDOT Office of Transit and Active Transportation Attn: Compliance Coordinator. AEOA/Arrowhead Transit and/or MnDOT, will investigate complaints received no more than 180 days after the alleged incident. All complaints that are complete will be processed and responded to based on the Title VI Complaint Procedures attached as **Appendix H**.

AEOA/Arrowhead Transit has created and made available a Title VI Complaint Form for use by customers who wish to file a Title VI complaint. The complaint form is available on AEOA/Arrowhead Transit's website at [aeoa.org](http://aeoa.org). The Title VI Complaint Form specifies the three classes protected by Title VI—race, color, and national origin—and allows the complainant to select one or more of those protected classes as the basis/bases for discrimination. The Title VI Complaint Form is a vital document. If a Limited English Proficient (LEP) population in the AEOA/Arrowhead Transit area meets the Safe Harbor threshold, then the procedure is provided in English and in any other language(s) spoken by LEP populations that meet the Safe Harbor Threshold may be available upon request. Attached as **Appendix I** is the Title VI Complaint Form.

## **E. Contact Information**

Based on the feedback received from agency staff, community members, LEP populations, and other key stakeholders; incremental changes may be needed for the type of written and oral language assistance provided, along with any staff training and community outreach efforts.

This Language Assistance Plan will be reviewed by our transit system every other year, with any revisions being approved by the Board of Directors or Policy Board and dated. The next review will occur in September, 2026.

Questions or comments about this plan may be submitted to:

**Cathy Pazzelli**  
**Director of Human Resources**  
**702 S 3<sup>rd</sup> Avenue**  
**Virginia, MN 55792**

**218-748-7350**  
**[cathy.pazzelli@aeoa.org](mailto:cathy.pazzelli@aeoa.org)**

*All elements of this Plan are in compliance with FTA Circular 4702.1B Title VI, FTA "A Handbook for Public Transportation Providers, and Minnesota State DOT - Office of Transit and Active Transportation Title VI Program: FTA*



## **AEOA, dba Arrowhead Transit**

# **Limited English Proficiency Four-Factor Analysis**

**Date: May 2022**

**Completed by/title: Cathy Pazzelli, Director of Human Resources**

### **Briefly describe the program or activity subject to analysis:**

Title VI and its regulations require subrecipients 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.

A community needs assessment is a tactical way of analyzing gaps in community services. It also determines the strengths and assets available in that community. The result from a community needs assessment helps the individual to better understand what the program must accomplish, and the steps that our organization need to take. The community needs assessment addresses the communities in St Louis, Cook and Lake counties. Because AEOA is only legislatively designated to serve Cook, Lake and St Louis counties, our partner Community Action agencies conduct Community Needs Assessments in their legislatively designated core service areas, and AEOA/Arrowhead Transit utilizes their results and reports to identify needs in those areas and help inform our decision making. Transit also looks at other avenues to ensure our geographical area is analyzed and reported.

### **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.

First examined prior experiences with LEP individuals and determined the number and proportion of LEP persons served or encountered within the service area. A transit system user survey will be completed in 2023 and will include questions to address experiences with LEP individuals and their language assistance service needs. AEOA/Arrowhead Transit also included LEP populations that are eligible to be served or likely to be affected or encountered. AEOA/Arrowhead Transit listens to the people it serves. As a Community Action Agency, AEOA conducts a Community Needs Assessment once every three years as required by the Community Service Block Grant (CSBG) authorizing statute to best determine the specific needs of people in poverty. AEOA collects and analyzes qualitative and quantitative data to evaluate the causes and consequences of poverty

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within AEOA's legislatively designated Community Action area of Cook, Lake and St Louis counties. AEOA conducted a Community Needs Assessment in 2021. Arrowhead Transit will be conducting a survey in 2023.

To support the efforts of conducting the four-factor analyses, AEOA/Arrowhead Transit 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 and the American Community Survey statistics, attached as **Appendix B**.

Cities Over 10,000 In Service Areas: Aitkin, Chisago, Carlton, Cook, Isanti, Itasca, Koochiching, Lake, Pine, St Louis

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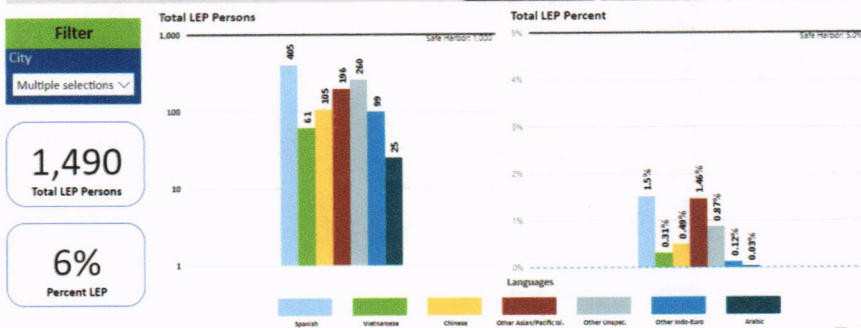
### Limited English Proficiency Data Tool

#### City ACS Limited English Proficiency

#### City ACS Limited English Proficiency

#### County ACS Limited English Proficiency

#### Students Primary Home Language



City	Spanish #	Spanish %	Vietnamese #	Vietnamese %	Chinese #	Chinese %	Other Asian/Pacific Isl. #	Other Asian/Pacific Isl. %	Other Unspec. #	Other Unspec. %	Other Indo-Euro #	Other Indo-Euro %	Arabic #	Arabic %	Korean #	Korean %	Fi. H. C.
Croquet	14	0.1%	0	0.00%	3	0.03%	16	0.14%	3	0.03%	0	0.00%	0	0.00%	0	0.00%	
Duluth	284	0.3%	18	0.02%	39	0.05%	29	0.04%	177	0.22%	99	0.12%	23	0.03%	36	0.04%	
Grand Rapids	24	0.2%	0	0.00%	0	0.00%	23	0.24%	13	0.14%	0	0.00%	0	0.00%	0	0.00%	
Hennepin	50	0.5%	0	0.00%	0	0.00%	0	0.00%	11	0.12%	0	0.00%	0	0.00%	0	0.00%	

Microsoft Power BI

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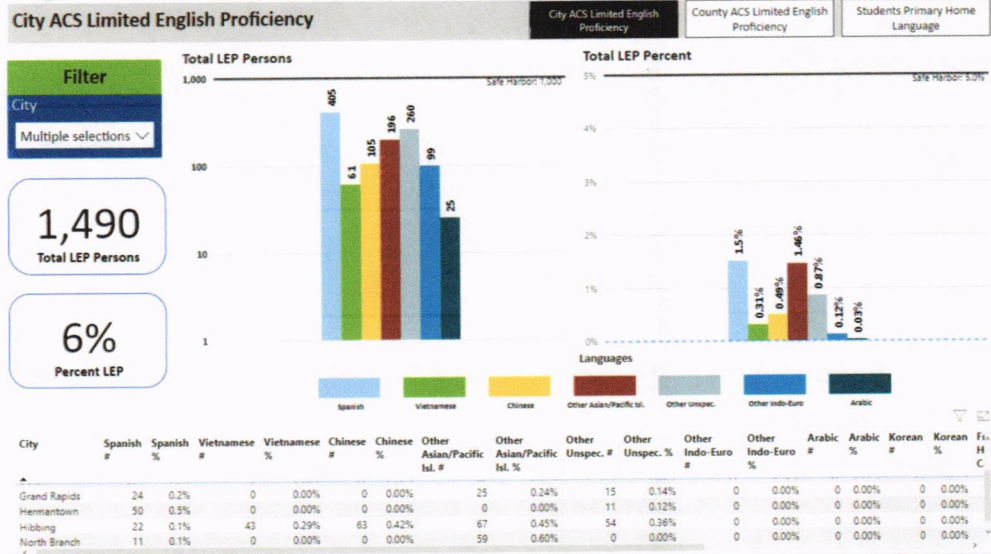
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Counties Served: Aitkin, Carlton, Chisago, Cook, Isanti, Itasca, Koochiching, Lake, Pine and St Louis.

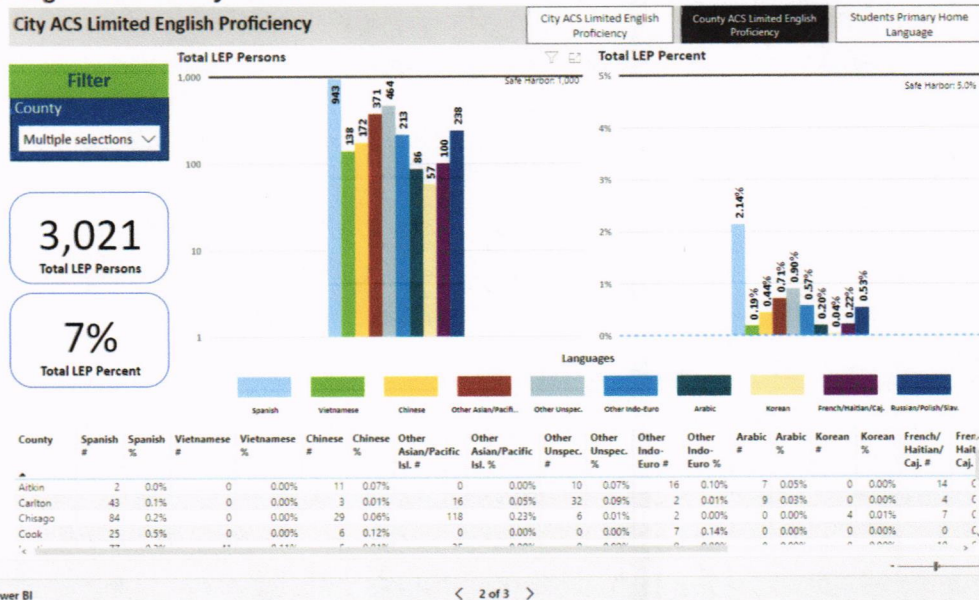
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### Limited English Proficiency Data Tool

#### City ACS Limited English Proficiency

City ACS Limited English Proficiency

County ACS Limited English Proficiency

Students Primary Home Language

Filter

County

Multiple selections

3,021  
Total LEP Persons

7%  
Total LEP Percent

Total LEP Persons

Safe Harbor: 1,000

Total LEP Percent

Safe Harbor: 5.0%



Languages



County	Spanish #	Spanish %	Vietnamese #	Vietnamese %	Chinese #	Chinese %	Other Asian/Pacific Isl. #	Other Asian/Pacific Isl. %	Other Unspec. #	Other Unspec. %	Other Indo-Euro #	Other Indo-Euro %	Arabic #	Arabic %	Korean #	Korean %	French/Haitian/Caj. #	French/Haitian/Caj. %
Alameda	77	0.2%	41	0.11%	5	0.01%	35	0.09%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	10	0.03%
Alameda	93	0.2%	0	0.00%	3	0.01%	33	0.08%	17	0.04%	3	0.01%	41	0.10%	0	0.00%	21	0.05%
Alameda	43	0.4%	0	0.00%	13	0.11%	0	0.00%	9	0.07%	19	0.16%	0	0.00%	0	0.00%	0	0.00%
Alameda	7	0.0%	0	0.00%	0	0.00%	17	0.12%	14	0.12%	0	0.00%	0	0.00%	0	0.00%	0	0.00%

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92%

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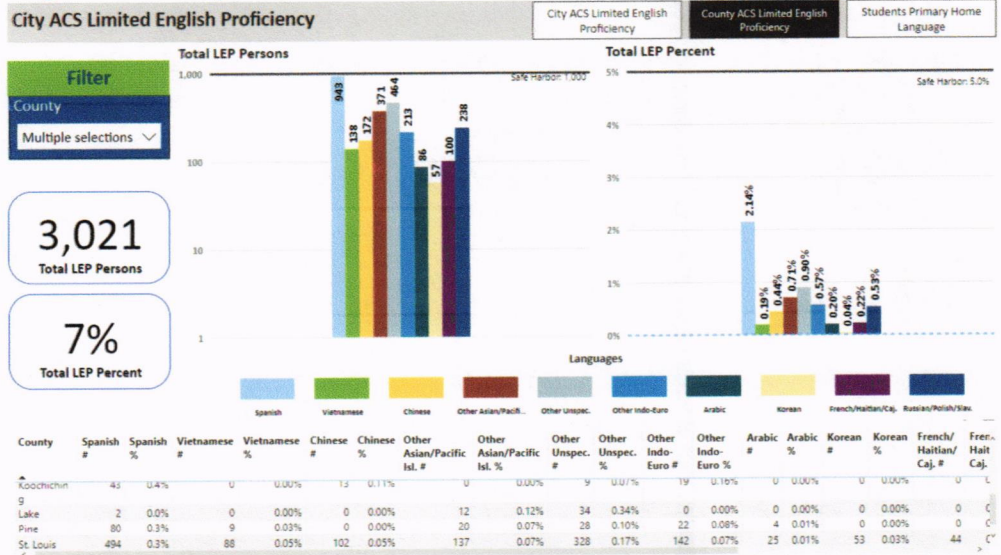
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### Limited English Proficiency Data Tool

Students Primary Home Language

City ACS Limited English Proficiency

County ACS Limited English Proficiency

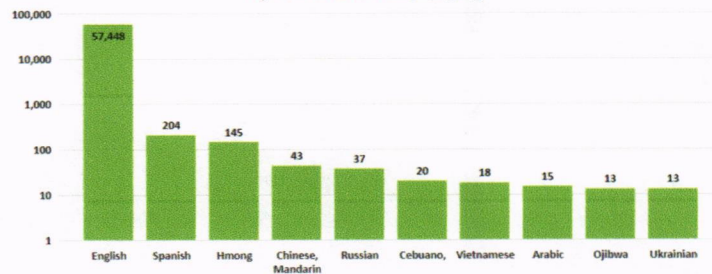
Students Primary Home Language

**Filter**

County & School District

- ☐ Roseau
- ☐ Scott
- ☐ Sherburne
- ☐ Sibley
- ☒ St. Louis
- ☐ Stearns
- ☐ Steele
- ☐ Stevens
- ☐ Swift

#### Top 10 - Enrollments by Language



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## Limited English Proficiency (LEP) Data

### American Community Survey (5-Year Estimate 2015-2019, Table ID C16001)

	Adrian	Carlton	Chicago	Cook	Isanti	Itasca	Kanabec	Lake	Pine	St. Louis	Total Service Area
Total population	15497	36207	56621	5600	41135	45014	12062	10905	26876	200231	452348
White	14538	31151	51394	4686	37886	40371	10975	10326	25480	177385	404294
Black or African American	62	562	853	25	314	278	44	17	478	4389	6720
American Indian and Alaska Native	395	2217	139	458	713	1552	284	51	998	4520	11027
Asian	38	353	776	49	489	145	39	55	284	1915	3923
Native Hawaiian or Pacific Islander	3	12	6	1	13	7	12	0	4	67	123
Other	64	185	482	50	346	210	54	45	224	1703	2843
Two or More Races	599	1947	2771	331	1808	2551	654	417	1428	19952	23528
Total	15497	36207	56621	5600	41135	45014	12062	10905	26876	200231	452348
Hispanic or Latino of any race	220	612	1851	123	896	618	167	113	713	3601	8516
White alone not Hispanic or Latino	14479	30910	50804	4679	37559	40356	10920	10281	25119	176112	404030

2020 ACS 5 year estimates

\*\*\* you will have to add Asian and other today to get the correct percentage since we do not have a box for Asian

Adrian County, Minnesota - Census Bureau Profile  
 Carlton County, Minnesota - Census Bureau Profile  
 Chicago County, Minnesota - Census Bureau Profile  
 Cook County, Minnesota - Census Bureau Profile  
 Isanti County, Minnesota - Census Bureau Profile  
 Itasca County, Minnesota - Census Bureau Profile  
 Kanabec County, Minnesota - Census Bureau Profile  
 Lake County, Minnesota - Census Bureau Profile  
 Pine County, Minnesota - Census Bureau Profile  
 St. Louis County, Minnesota - Census Bureau Profile

### AMERICAN COMMUNITY SURVEY

## Appendix A Page 8 of 12

### Primary Languages for Transit System County Programs or Information

The data provided in **Appendix B** identified English, Spanish and Hmong LEP groups in the jurisdiction providing service. While Spanish, Hmong and LEP groups served by Arrowhead Transit fell just short of the safe harbor threshold, AEOA/Arrowhead Transit will assess this data annually to determine whether the threshold is met.

AEOA/Arrowhead Transit assessed the following information about LEP persons to determine the number or proportion of LEP persons, who might use or want to use our transit services:

- LEP Data Tool
  - Survey Results
  - Local School District Data
  - Other Human Services Data
1. **Counties (City) served:** Aitkin, Carlton, Chisago, Cook, Isanti, Itasca, Koochiching, Lake, Pine, St Louis.
  2. **Total county/counties population:**  
Aitkin 15,826, Carlton 35,709, Chisago 55,844, Cook 5,402, Isanti 40,004, Koochiching 12,355, Lake 10,571, Pine 29,254, St Louis 199,499.
  3. **The total number of LEP individuals in our service area is:** 3,021 (7%)
  4. **The total eligible population in our service area is:** 364,460
  5. **The proportion (percentage) of LEP population to the total eligible service population is:** .82%

### Reliable External Data Sources for Identifying LEP Groups

AEOA/Arrowhead Transit 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 subrecipients to identify LEP language groups by county city, and school district. Webpage includes further details about how to use the tool.

In addition to identifying and examining prior experiences with LEP individuals and the external data sources outlined above, AEOA/Arrowhead Transit looked at local data resources to determine the number or proportion of LEP individuals who may be eligible to be served. These include:

- ☒ Survey results:
  - Describe: American Community Survey
- ☒ Locally Coordinated Human Services/Transit Plan
- ☒ Other Human Services data
- ☒ School District Data
- ☒ Employment and Training



## Appendix A Page 9 of 12

- ☐ Information from local organizations (community action; affirmative action) about LEP persons in our service area
- ☐ Reports from drivers, dispatchers, and others about contact with LEP persons
- ☒ Career Force Data

### Safe Harbor for Written Translations

U.S. DOT LEP Guidance provides a “safe harbor” to help ensure greater clarity regarding whether AEOA/Arrowhead Transit 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 AEOA/Arrowhead Transit 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.** While Spanish, Hmong and LEP groups served by Arrowhead Transit fell just short of the safe harbor threshold, AEOA/Arrowhead Transit will assess this data annually to determine whether the threshold is met.

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

AEOA/Arrowhead Transit 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. 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



## **Appendix A**

### **Page 10 of 12**

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 AEOA/Arrowhead Transit will look for opportunities to increase their outreach efforts to all LEP language groups.

LEP persons may interact in several ways other than for public transit trip opportunities, with AEOA/Arrowhead Transit, 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
- AEOA/Arrowhead Transit website

Arrowhead Transit will document over the next 3-year period, the frequency in which LEP individuals from different language groups come into contact with AEOA/Arrowhead Transit programs, activities, or services.

The conclusion drawn from examining information about LEP persons seeking services are: In rural areas which we serve, there are very few LEP persons utilizing our services.

AEOA/Arrowhead Transit understands the critical nature of delivering services that meet the social, cultural and linguistic needs of our customers. The ability to understand, communicate and effectively interact with diverse populations is of utmost importance, as it decreases the chance of miscommunication and significantly improves the potential for positive service delivery outcomes.

### **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.

Our transit system considers transit to be an important and essential service for many people living in our service area. AEOA/Arrowhead Transit works with the community organizations, such as Housing, Energy Assistance, Head Start, ABE, Career Force centers, food shelves, local shelters, school districts, and Senior Services, to provide opportunities for access and information to public transit services.

Each department at AEOA has a procedure of how language assistance is provided to persons who have difficulty communicating. Such language assistance services may include interpretation services, and when required by law, the translation of vital documents.



## **Appendix A**

### **Page 11 of 12**

#### **Housing**

- Teletypewriter (TTY)
- Telecommunication Relay Service (TRS)
- 711 – translates speech to text for those that are hard of hearing
- Dialog One – translation and interpretation

#### **Employment & Training**

- CareerForce locations have the ability to effectively communicate and serve individuals with disabilities who come into the CareerForce locations.
- Text to speech software, the ability to increase the font-size on computers.
- Language line – MN.IT is in charge of the language line accounts (DEED).
- Pocket Talker – assist for the hard of hearing customers.
- Ubi Duo – communication device to break barriers for deaf and hard of hearing – text to talk device.

#### **Head Start**

- Has contracted with interpreters (foreign language and sign language as needed). If this is required by the child's IEP, it is the School District's responsibility to provide these services.

AEOA/Arrowhead Transit has determined there is no impact on actual and potential beneficiaries of delays in the provision of LEP services.

Because no languages were identified as meeting the safe harbor threshold for translating vital written materials, AEOA/Arrowhead Transit is not at this time providing a list of documents considered vital. Should future analysis indicate an LEP group meeting the safe harbor threshold, AEOA/Arrowhead Transit 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.**

AEOA/Arrowhead Transit has weighed the demand for language assistance against the agency's current and projected financial and personnel resources. In our analysis, we have determined if the language services, or lack of language services, currently provided is cost effective and to plan for future investments that will provide the most needed assistance to the greatest number of LEP individuals within our service jurisdiction. AEOA/Arrowhead Transit will determine on a case-by-case basis whether language assistance costs outweigh the benefits.

AEOA/Arrowhead Transit does not have a separate budget for service LEP clients. Our Adult Education program serves LEP students in English language courses and are provided a small portion of their service allocation based on the numbers of LEP students in the local school districts. This allocation accounts roughly 0.02% of their overall program funding.

## **Appendix A**

### **Page 12 of 12**

#### **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)

Based on the findings of most prevalent non-English languages, will you need to translate documents for any or all of the identified populations? No.

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



## Limited English Proficiency (LEP) Data

Cities Over 10,000 In Service Areas: Aitkin, Chisago, Carlton, Cook, Isanti, Itasca, Koochiching, Lake, Pine, St Louis

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### Limited English Proficiency Data Tool

#### City ACS Limited English Proficiency

#### City ACS Limited English Proficiency

#### County ACS Limited English Proficiency

#### Students Primary Home Language

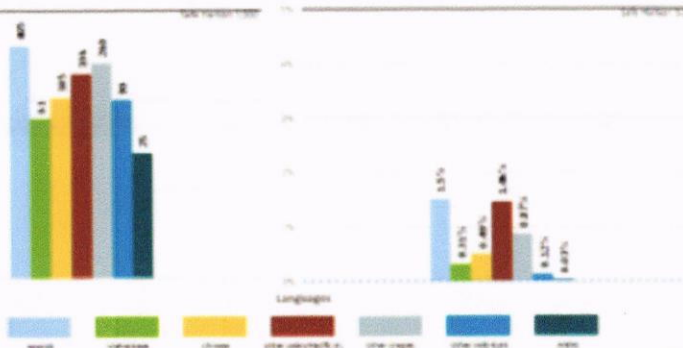
Filter  
City  
Multiple selections

1,490  
Total LEP Persons

6%  
Percent LEP

Total LEP Persons

Total LEP Percent



City	Spanish #	Spanish %	Vietnamese #	Vietnamese %	Chinese #	Chinese %	Other Asian/Pacific #	Other Asian/Pacific %	Other Languages #	Other Languages %	Other Indo-Euro #	Other Indo-Euro %	Academic #	Academic %	Romance #	Romance %	Fr. C.
Aitkin	14	0.1%	0	0.00%	3	0.02%	15	0.14%	3	0.03%	0	0.00%	0	0.00%	0	0.00%	
Chisago	254	0.2%	18	0.02%	39	0.03%	24	0.04%	177	0.02%	99	0.02%	25	0.03%	38	0.04%	
Carlton	14	0.2%	0	0.00%	0	0.00%	25	0.14%	15	0.14%	0	0.00%	0	0.00%	0	0.00%	
Grand Rapids	50	0.3%	0	0.00%	0	0.00%	0	0.00%	17	0.02%	0	0.00%	0	0.00%	0	0.00%	

## Limited English Proficiency (LEP) Data

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### Limited English Proficiency Data Tool

#### City ACS Limited English Proficiency

City ACS Limited English Proficiency

County ACS Limited English Proficiency

Students Primary Home Language

#### Filter

City

Multiple selections

1,490

Total LEP Persons

6%

Percent LEP

Total LEP Persons

1,000

100

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1

Total LEP Percent

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## Limited English Proficiency (LEP) Data

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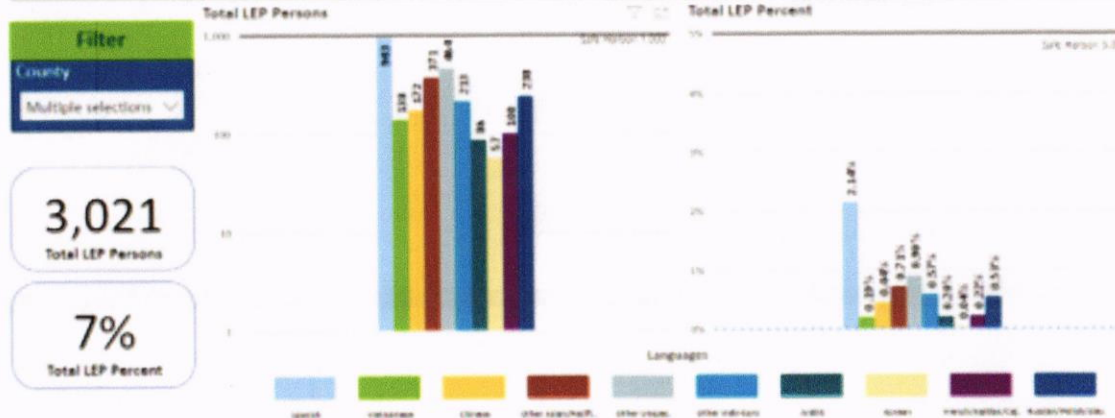
### Limited English Proficiency Data Tool

#### City ACS Limited English Proficiency

City ACS Limited English Proficiency

County ACS Limited English Proficiency

Students Primary Home Language



County	Spanish #	Spanish %	Vietnamese #	Vietnamese %	Chinese #	Chinese %	Other Asian/Pacific Is. #	Other Asian/Pacific Is. %	Other Asian/Pacific Is. #	Other Asian/Pacific Is. %	Other Asian/Pacific Is. #	Other Asian/Pacific Is. %	Other Asian/Pacific Is. #	Other Asian/Pacific Is. %	Other Asian/Pacific Is. #	Other Asian/Pacific Is. %	Other Asian/Pacific Is. #	Other Asian/Pacific Is. %	Other Asian/Pacific Is. #	Other Asian/Pacific Is. %
Adair	2	0.0%	0	0.00%	11	0.07%	0	0.00%	10	0.07%	16	0.10%	7	0.05%	0	0.00%	14	0.09%	0	0.00%
Carbon	45	0.1%	0	0.00%	3	0.01%	16	0.05%	32	0.09%	2	0.01%	9	0.03%	0	0.00%	4	0.01%	0	0.00%
Chicago	84	0.2%	0	0.00%	29	0.08%	110	0.21%	6	0.01%	2	0.00%	10	0.02%	4	0.01%	7	0.01%	0	0.00%
Cook	21	0.0%	0	0.00%	6	0.12%	0	0.00%	0	0.00%	7	0.14%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Total	144	0.1%	0	0.00%	46	0.00%	126	0.00%	34	0.00%	25	0.00%	26	0.00%	14	0.00%	25	0.00%	14	0.00%

Microsoft Power BI

< 2 of 3 >

## Limited English Proficiency (LEP) Data

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### Limited English Proficiency Data Tool

#### City ACS Limited English Proficiency

City ACS Limited English Proficiency

County ACS Limited English Proficiency

Students Primary Home Language

Filter

County

Multiple selections

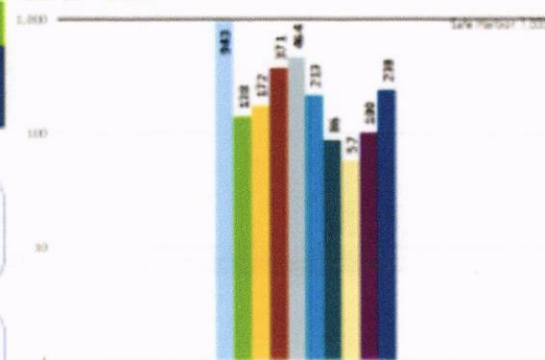
3,021

Total LEP Persons

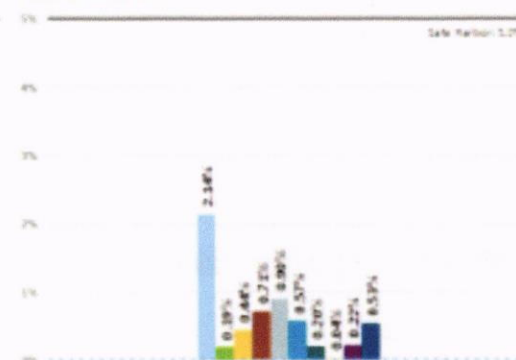
7%

Total LEP Percent

Total LEP Persons



Total LEP Percent



Languages



County	Spanish #	Spanish %	Vietnamese #	Vietnamese %	Chinese #	Chinese %	Other Asian/Pacific #	Other Asian/Pacific %	Other Unspec #	Other Unspec %	Other Indo-Euro #	Other Indo-Euro %	Arabic #	Arabic %	Korean #	Korean %	French/Italian/Haiti #	French/Italian/Haiti %	Russian/Polish/Heb #	Russian/Polish/Heb %
Adams	77	0.2%	41	0.11%	5	0.01%	31	0.09%	3	0.00%	0	0.00%	0	0.00%	0	0.00%	10	0.03%	0	0.00%
Baker	89	0.2%	0	0.00%	3	0.01%	33	0.08%	17	0.04%	3	0.01%	41	0.10%	0	0.00%	21	0.05%	0	0.00%
Boone	41	0.4%	0	0.00%	13	0.11%	0	0.00%	9	0.07%	10	0.14%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Total	3	0.0%	0	0.00%	0	0.00%	13	0.13%	34	0.34%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%



## Limited English Proficiency (LEP) Data

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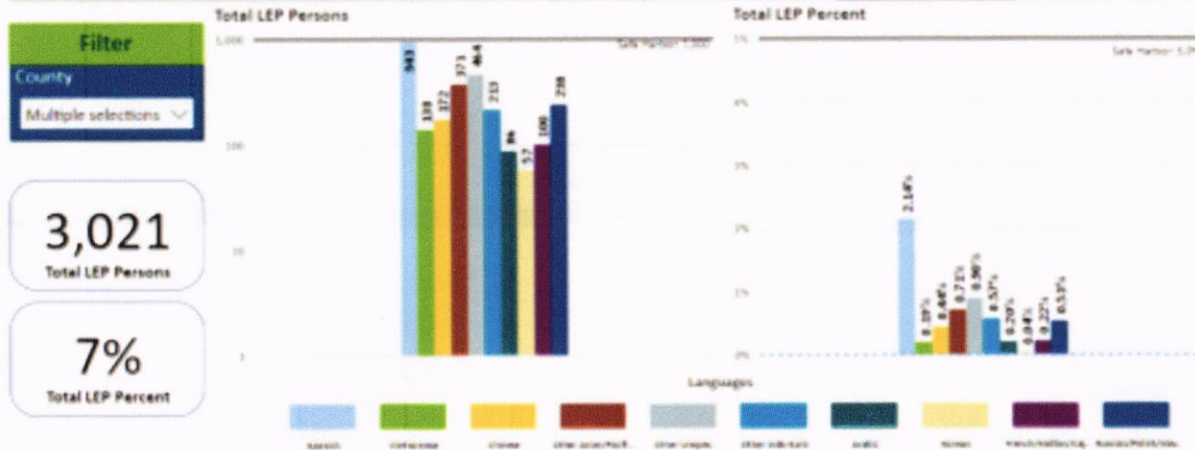
### Limited English Proficiency Data Tool

#### City ACS Limited English Proficiency

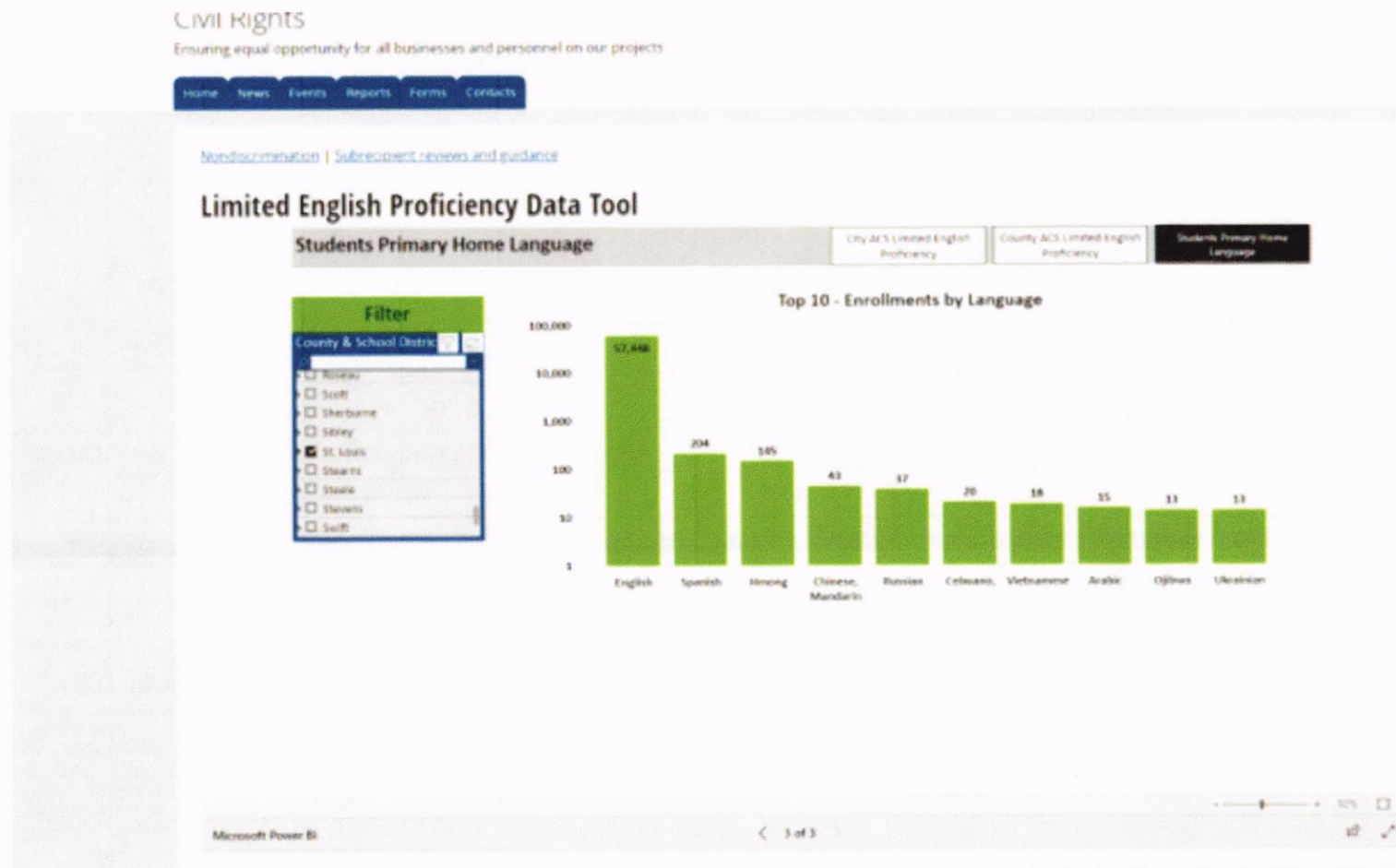
#### City ACS Limited English Proficiency

#### County ACS Limited English Proficiency

#### Students Primary Home Language



## Limited English Proficiency (LEP) Data





## Limited English Proficiency (LEP) Data

### American Community Survey (5-Year Estimate 2015-2019, Table ID C16001)

	Atkin	Carlton	Chicago	Cook	Isanti	Itasca	Koochiching	Lake	Pine	St. Louis	Total Service Area
Total population	15697 100%	36207 100%	56621 100%	5600 100%	41135 100%	45014 100%	12062 100%	10905 100%	28876 100%	200231 100%	452348 100%
White	14538 92.6%	31151 86.0%	51394 90.8%	4686 83.7%	37888 92.1%	40371 89.7%	10975 91.0%	10326 94.7%	25480 88.2%	177385 88.6%	404194 89.35%
Black or African American	62 0.4%	562 1.6%	853 1.5%	25 0.4%	318 0.8%	178 0.4%	44 0.4%	11 0.1%	478 1.7%	4189 2.1%	6720 1.49%
American Indian and Alaska Native	395 2.5%	2217 6.1%	339 0.6%	458 8.2%	213 0.5%	1552 3.4%	284 2.4%	51 0.5%	998 3.5%	4520 2.3%	11027 2.44%
Asian	38 0.2%	153 0.4%	776 1.4%	49 0.9%	489 1.2%	145 0.3%	39 0.3%	55 0.5%	264 0.9%	1915 1.0%	3923 0.87%
Native Hawaiian or Pacific Islander	1 0.0%	12 0.0%	6 0.0%	1 0.0%	13 0.0%	7 0.0%	12 0.1%	0 0.0%	4 0.0%	67 0.0%	123 0.03%
Other	64 0.4%	165 0.5%	482 0.9%	50 0.9%	346 0.8%	210 0.5%	54 0.4%	45 0.4%	224 0.8%	1203 0.6%	2843 0.63%
Two or More Races	599 3.8%	1947 5.4%	2771 4.9%	331 5.9%	1868 4.5%	2551 5.7%	654 5.4%	417 3.8%	1428 4.9%	10952 5.5%	23518 5.20%
<b>Total</b>	<b>15697 100.0%</b>	<b>36207 100.0%</b>	<b>56621 100.0%</b>	<b>5600 100.0%</b>	<b>41135 100.0%</b>	<b>45014 100.0%</b>	<b>12062 100.0%</b>	<b>10905 100.0%</b>	<b>28876 100.0%</b>	<b>200231 100.0%</b>	<b>452348 100%</b>
Hispanic or Latino of any races	220 1.4%	612 1.7%	1451 2.6%	123 2.2%	896 2.2%	618 1.4%	167 1.4%	113 1.0%	713 2.5%	3603 1.8%	8516 1.88%
White alone not Hispanic or Latino	14479 92.2%	30910 85.4%	50804 89.7%	4670 83.4%	37559 91.3%	40266 89.2%	10920 90.5%	10281 94.3%	25119 87.0%	176112 88.0%	401020 89.22%

2020 ACS 5 year estimates

\*\*\* you will have to add Asian and other today to get the correct percentage since we do not have a box for Asian

Atkin County, Minnesota - Census Bureau Profile  
 Carlton County, Minnesota - Census Bureau Profile  
 Chicago County, Minnesota - Census Bureau Profile  
 Cook County, Minnesota - Census Bureau Profile  
 Isanti County, Minnesota - Census Bureau Profile  
 Itasca County, Minnesota - Census Bureau Profile  
 Koochiching County, Minnesota - Census Bureau Profile  
 Lake County, Minnesota - Census Bureau Profile  
 Pine County, Minnesota - Census Bureau Profile  
 St. Louis County, Minnesota - Census Bureau Profile

### AMERICAN COMMUNITY SURVEY

## Appendix C

# Language Identification

The findings from the graphs within Appendix B do not indicate any LEP language groups meet the safe harbor threshold. At this time, AEOA/Arrowhead Transit will not translate written documents. However, efforts will be made to reasonably accommodate any language access requests that may arise. Current efforts for language assistance include contacting the Career Force where there is an interpreter and the interactive online program, Dialogue 1.



APPENDIX E  
Page 1 of 2

## Language Service / Public Participation Log

AEOA/Arrowhead Transit staff should make an effort to track all language services requested or proactively provided throughout the year. AEOA/Arrowhead Transit has designated the following staff position to be primarily responsible for ensuring the log is consistently utilized: **Cathy Pazzelli, Director of Human Resources, [cathy.pazzelli@aeoa.org](mailto:cathy.pazzelli@aeoa.org).**

AEOA/Arrowhead Transit realizes that Arrowhead Transit has work to do to better document when language services are being utilized, and we are committed to improve documentation of these services over the next 3 year period.

No public participation occurred in 2022. However Arrowhead Transit will be conducting, involving and documenting public participation in 2023 and beyond.

**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 AEOA/Arrowhead Transit 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.

**APPENDIX E**  
**Page 2 of 2**

## Language Service / Public Participation Log

*Will be updated and on-going as required.*

**AEOA/ARROWHEAD TRANSIT**

### LANGUAGE SERVICE/PUBLIC PARTICIPATION LOG

DATE OF SERVICE	REQUEST OR PROACTIVE	TRANSLATION, INTERPRETATION OR OTHER SERVICE	DESCRIPTION OF SERVICE PROVIDED	VITAL DOCUMENT	LANGUAGES(S)	SERVICE PROVIDER	TYPE OF SERVICE PROVIDER	ADDITIONAL COMMENTS