

Limited English Proficiency Plan

Appendix to the University of Minnesota Twin Cities Transit
Title VI Program

In Compliance with FTA Circular 4702.1B



*Parking &
Transportation Services*

UNIVERSITY OF MINNESOTA

Limited English Proficiency Plan

This Limited English Proficiency Plan has been prepared to address the University of Minnesota Parking & Transportation Services' responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills accessing the services offered by University of Minnesota Parking & Transportation Services. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 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, titled 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. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal transit funds, including the University of Minnesota Parking & Transportation Services where applicable relating to University of Minnesota Parking & Transportation Services and facilities.

The University of Minnesota Parking & Transportation Services has developed this Limited English Proficiency Plan to help identify reasonable steps for providing language assistance to persons with Limited English proficiency (LEP) who wish to access services provided by the transit authority. 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.

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 University of Minnesota Parking & Transportation Services undertook the U.S. DOT four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter a University of Minnesota Parking & Transportation Services program, activity or service.
2. The frequency with which LEP persons come in contact with the University of Minnesota Parking & Transportation Services programs, activities or services.
3. The nature and importance of programs, activities or services provided by the University of Minnesota Parking & Transportation Services to the LEP population.
4. The resources available to the University of Minnesota Parking & Transportation Services and overall cost to provide LEP assistance.

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter a University of Minnesota Parking & Transportation Services program, activity or service.

The University of Minnesota is home to about 50,000 students and 20,000 staff and faculty.

The majority of campus transit riders are students. The University of Minnesota Parking & Transportation Services staff reviewed the 2020 incoming freshman admissions list and determined that 5,500 freshman students were admitted to the University. University Admissions requires that all the students had to have passed an English language exam as a precondition of admission to the University of Minnesota. As an admissions requirement of the University, every incoming student is required to have passed the Test of English as a Second Language (TOEFL), received an exemption, or be eligible for College English Transitions Program. English language proficiency is not a major impediment to the users the University of Minnesota transit system. Additional information on admissions requirements can be found in below or [online](#).

Staff also looked at countries of origin for international students to see what languages may be most prevalent. Countries of origin can be used as a proxy for primary language and help provide insight into what languages are spoken on campus. Some of countries with the highest level of representation include: China, Korea, Taiwan, India, Vietnam, and Malaysia. In addition, countries in Europe, North/South/Central America, and Africa are represented. A complete list is included in below.

To consider the need of faculty and staff, transit staff looked at a qualitative survey conducted by University Services Human Resources of languages spoken among its staff of approximately 5,000 as a representation of what languages may be most prevalent on campus. That study found that the following languages, other than English, were prevalent among that staff population: Spanish, Tigrinya, Oromo, Amharic, Somali, and Hmong.

These services may also serve the general public. Visitors (whether for work, sports, culture, art, etc.) and hospital and clinic patients, are among those coming to campus. It would be difficult to determine exact origins of these individuals accurately.

2. The frequency with which LEP persons come in contact with the University of Minnesota Parking & Transportation Services programs, activities or services.

The University of Minnesota Parking & Transportation Services assessed the frequency with which staff and drivers have or could have contact with LEP passengers. This includes documenting phone inquiries and surveying vehicle operators. As of April 2020, the University of Minnesota and First Transit, contracted vendor, have had zero requests for interpreters or for translated documents. Exhibit 6 is the driver and staff survey. Exhibit 8 is the log to record inquiries for requests for interpreters and requests for translated transit documents.

In March 2020, University of Minnesota Parking & Transportation Services surveyed the 31 First Transit drivers and dispatchers that have direct involvement in the dial-a-ride program. None of the 31 drivers recalled in the past 30 days coming in contact with an LEP customer, but 9 drivers indicated that they had assisted passengers who could have benefited had the communication been in a different language than English. However, in all 9 cases, passengers communicated in English and the drivers concluded that they were able to help the passengers even though there was the language difficulty.

Drivers may have general contact with an LEP individuals, but are finding that the individuals do not require special assistance to successfully use the system. If future surveys show that a consistent need for a particular language, would target those.

3. The nature and importance of programs, activities or services provided by the University of Minnesota Parking & Transportation Services to the LEP population.

The overwhelming majority of the population in the University of Minnesota Twin Cities service area speaks some level of English as a condition of admission to the University of Minnesota.

There are few social services, professional and leadership organizations within the University of Minnesota service area that focus on outreach to LEP individuals. There are resources available at the University to assist LEP individuals including: [Minnesota English Proficiency Language Program](#), [ESL Resources](#) for faculty/staff and students.

The University of Minnesota Parking & Transportation Services provides two transportation services that serve the general public, which include the campus shuttle and the demand response [dial-a-ride paratransit] system.

4. The resources available to the University of Minnesota Parking & Transportation Services and overall cost to provide LEP assistance.

The University of Minnesota Parking & Transportation Services assessed its available resources that could be used for providing LEP assistance, and has determined that it could afford a professional interpreter and translation service on an as-needed basis. Furthermore, has determined that its pocket schedule and Title XI statement on all vehicles are the most important document to be translated if the need should arise. Finally, the University of Minnesota Parking & Transportation Services could partner with for outreach and translation efforts with outside organizations given such services do not exist within the University.

The amount of staff and driver training that might be needed was also considered. Based on the four-factor analysis, the University of Minnesota Parking & Transportation Services developed its LEP Plan as outlined in the following section.

Limited English Proficiency [LEP] Plan Outline

The University of Minnesota Parking & Transportation Services has narrowed down the options to assist LEP individuals to utilize Fixed Route and Dial-a-Ride transportation services. Professional interpreter and document translation services will be provided as needed given the overall low percentage of LEP persons within the University of Minnesota service area.

Language Assistance Measures

Although there is a very low percentage in the University of Minnesota Parking & Transportation Services service area of LEP individuals, that is, persons who speak English “not well” or “not at all,” the University of Minnesota Parking & Transportation Services will ensure that the following measures are in place:

- The University of Minnesota Parking & Transportation Services Title VI Program and Limited English Proficiency Plan will be posted on the agency website: at pts.umn.edu
- 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.

Staff Training

The following training will be provided to University of Minnesota Parking & Transportation Services staff members that are directly involved with the University of Minnesota Transit operations:

- Information on the University of Minnesota Parking & Transportation Services’ Title VI Program and LEP responsibilities.
- Description of language assistance services offered to the public.
- Documentation of language assistance and document translation requests.
- How to handle a potential Title VI/LEP complaint.

Outreach Techniques

Due to the small local LEP population, University of Minnesota Parking & Transportation Services initiated outreach activities are expected to be minimal, but the following procedure will be utilized as the need arises:

- When staff prepares a document, or schedules a meeting, for which the target audience is expected to consist of primarily LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.
- Bus schedules, maps, and other transit publications will be made available online in an alternative language when and if a specific and concentrated LEP population is identified.

Monitoring and Updating the LEP Plan

The University of Minnesota Parking & Transportation Services will update the LEP every three years as required by the U.S. DOT. In addition, the plan will be reviewed and updated when it is clear that higher concentrations of LEP individuals are present in the University of Minnesota service area.

Dissemination of the University of Minnesota Parking & Transportation Services LEP Plan

A link to the University of Minnesota Parking & Transportation Services LEP Plan and the Title VI Plan will be included on the University of Minnesota Parking & Transportation Services Transit website, pts.umn.edu.

Any person or agency with internet access will be able to access and download the plan from The University of Minnesota Parking & Transportation Services website. Alternatively, 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 copies of the plan in translation which the University of Minnesota Parking & Transportation Services will provide, if feasible. Questions or comments regarding the LEP Plan may be submitted to the University of Minnesota Parking & Transportation Services as follows:

University of Minnesota Parking & Transportation Services
300 Transportation & Safety Building,
511 Washington Ave SE
Minneapolis MN 55455
Phone: 612-626-7275 / email: parking@umn.edu

University of Minnesota Admission Requirements

If you are a non-native speaker of English, and you have lived in the United States for less than 8 years, you may be required to submit the results of an English language test. Also, if you have taken the ACT exam and scored 21 or lower on the English OR reading section (or SAT Evidence Based Reading and Writing score of 540 or lower), you may be asked to submit scores from an English language test.

You may also be exempt from this requirement if:

- You have successfully completed 26 or more transferable semester credits at a two- or four-year post-secondary institution in the United States AND have completed the equivalent of the U of MN freshman English writing requirement with a grade of C or better;
- You have successfully completed 60 or more transferable semester credits at a two- or four-year post-secondary institution in the United States.

The University of Minnesota accepts the results of the Test of English as a Foreign Language (TOEFL) or the Minnesota Battery.

Most undergraduate programs at the University of Minnesota require a specific minimum score (see the chart below). Some undergraduate programs may admit students with lower scores, but will require an additional test prior to registration. The results of this test will determine if any additional English courses will be required. Some programs in the health sciences require higher scores.

Test	Minimum score
Computer-based TOEFL	550
Internet-based TOEFL	79

An official report of the TOEFL, Minnesota Battery, or IELTS scores should be sent to the Office of Admissions. Our TOEFL institutional code is 6874.

Minnesota Battery

The [Minnesota Battery test](#) includes listening, grammar, cloze, vocabulary, reading, and composition. It is designed to determine the English proficiency of students. In the event that the Office of Admissions requests that an applicant take the Minnesota Battery, the fee will be waived. Students from whom we request the Minnesota Battery will be instructed to contact the Office of Admissions at 1-800-752-1000 for test and registration details.

- The Minnesota Battery is offered on the University of Minnesota campus. Testing is paper-based and occurs approximately once a month throughout the year.

- The test takes approximately 2.5 hours to complete. Sample questions are available upon request.
- Bring a picture I.D. (e.g. driver's license, passport, or student I.D.).

Students who are otherwise eligible for admission to the President's Emerging Scholars Program in the College of Education & Human Development may study English through the **College English Transitions program**. International students on visas are not eligible for this program.

College English Transitions is a freshman program at the U of M for students who are non-native speakers of English. The program is designed to help students build academic English skills while taking a sequence of typical President's Emerging Scholars Program courses, including: freshman writing, speech, and reading courses connected to biology, sociology, chemistry, and psychology. All courses offer college credit and fulfill U of M requirements. For more information regarding the College English Transitions program, contact 612-625-0772 or www.cehd.umn.edu/trio/cet/default.html.

With the language requirements in place for admission to the University and the resources available, LEP assistance is being completed comprehensively at the University-wide level.

University of Minnesota Countries of Origin Table

University of Minnesota TC Enrollment - Countries of Origin			
Fall 2019			
Category	Country	Count of Category	Enrollment
Minnesota	United States - Greater MN	1247	6,791
Minnesota	United States - TC Metro	272	24,885
Minnesota	United States - Unknown	11	23
Other US	United States - Other	994	7,472
Other US	United States - Reciprocity	101	5,632
Foreign	Zimbabwe	2	5
Foreign	Zambia	1	1
Foreign	Yemen	3	5
Foreign	Vietnam	21	157
Foreign	Venezuela	8	12
Foreign	Uzbekistan	2	2
Foreign	Uruguay	5	5
Foreign	Unknown	10	71
Foreign	United Kingdom	13	32
Foreign	United Arab Emirates	4	6
Foreign	Ukraine	5	6
Foreign	Uganda	5	5

University of Minnesota TC Enrollment - Countries of Origin			
Fall 2019			
Category	Country	Count of Category	Enrollment
Foreign	Turkey	16	62
Foreign	Tunisia	4	4
Foreign	Trinidad and Tobago	2	3
Foreign	Thailand	18	42
Foreign	Tanzania, United Republic of	4	4
Foreign	Taiwan	23	149
Foreign	Syrian Arab Republic	1	1
Foreign	Switzerland	5	5
Foreign	Sweden	5	10
Foreign	Sudan	3	3
Foreign	Sri Lanka	9	10
Foreign	Spain	10	32
Foreign	South Africa	7	8
Foreign	Slovakia	3	3
Foreign	Singapore	8	18
Foreign	Serbia	4	9
Foreign	Senegal	4	4
Foreign	Saudi Arabia	14	49
Foreign	Rwanda	1	1
Foreign	Russian Federation	12	37
Foreign	Romania	4	5
Foreign	Qatar	3	3
Foreign	Puerto Rico	15	27
Foreign	Portugal	2	4
Foreign	Poland	4	5
Foreign	Philippines	5	10
Foreign	Peru	11	22
Foreign	Paraguay	3	3
Foreign	Panama	4	4
Foreign	Palestinian Territory	2	4
Foreign	Pakistan	13	24
Foreign	Oman	7	80
Foreign	Norway	10	19
Foreign	Northern Mariana Islands	1	1
Foreign	Nigeria	12	29
Foreign	Nicaragua	1	1
Foreign	New Zealand	5	5

University of Minnesota TC Enrollment - Countries of Origin			
Fall 2019			
Category	Country	Count of Category	Enrollment
Foreign	Netherlands	8	15
Foreign	Nepal	12	30
Foreign	Namibia	1	1
Foreign	Myanmar	6	9
Foreign	Mozambique	1	1
Foreign	Morocco	4	7
Foreign	Mongolia	6	10
Foreign	Mexico	15	51
Foreign	Mauritius	3	3
Foreign	Maldives	1	1
Foreign	Malaysia	18	154
Foreign	Malawi	1	1
Foreign	Macedonia	4	4
Foreign	Macao	2	2
Foreign	Luxembourg	1	1
Foreign	Lithuania	1	1
Foreign	Liechtenstein	1	1
Foreign	Libyan Arab Jamahiriya	3	3
Foreign	Liberia	1	1
Foreign	Lesotho	1	1
Foreign	Lebanon	8	12
Foreign	Lao People's Democratic Republic	1	1
Foreign	Kyrgyzstan	2	2
Foreign	Kuwait	5	7
Foreign	Korea, Republic of	33	553
Foreign	Kenya	10	18
Foreign	Kazakhstan	8	9
Foreign	Jordan	3	5
Foreign	Japan	18	81
Foreign	Jamaica	2	6
Foreign	Italy	14	23
Foreign	Israel	4	9
Foreign	Ireland	1	1
Foreign	Iraq	3	3
Foreign	Iran, Islamic Republic of	11	76
Foreign	Indonesia	14	57
Foreign	India	29	871

University of Minnesota TC Enrollment - Countries of Origin			
Fall 2019			
Category	Country	Count of Category	Enrollment
Foreign	Iceland	1	2
Foreign	Hungary	6	8
Foreign	Hong Kong	12	63
Foreign	Honduras	2	3
Foreign	Haiti	1	1
Foreign	Guatemala	5	5
Foreign	Guam	1	2
Foreign	Grenada	1	1
Foreign	Greece	7	27
Foreign	Ghana	7	13
Foreign	Germany	11	31
Foreign	Gambia	4	4
Foreign	Gabon	1	1
Foreign	France	10	30
Foreign	Finland	4	6
Foreign	Ethiopia	12	20
Foreign	Estonia	1	1
Foreign	El Salvador	5	6
Foreign	Egypt	12	29
Foreign	Ecuador	8	17
Foreign	Dominican Republic	1	1
Foreign	Denmark	5	7
Foreign	Czech Republic	3	3
Foreign	Cyprus	3	4
Foreign	Cuba	1	1
Foreign	Croatia	3	3
Foreign	Cote d'Ivoire	3	3
Foreign	Costa Rica	9	14
Foreign	Congo, The Democratic Republic of the	1	1
Foreign	Congo	1	1
Foreign	Colombia	14	37
Foreign	China	35	2,755
Foreign	Chile	10	17
Foreign	Canada	24	144
Foreign	Cameroon	3	3
Foreign	Cambodia	3	3

University of Minnesota TC Enrollment - Countries of Origin			
Fall 2019			
Category	Country	Count of Category	Enrollment
Foreign	Bulgaria	2	2
Foreign	Brunei Darussalam	2	2
Foreign	Brazil	16	88
Foreign	Bosnia and Herzegovina	1	1
Foreign	Bolivia	6	6
Foreign	Benin	2	3
Foreign	Belize	1	1
Foreign	Belgium	2	2
Foreign	Belarus	3	4
Foreign	Bangladesh	15	51
Foreign	Bahrain	1	1
Foreign	Bahamas	2	2
Foreign	Azerbaijan	1	1
Foreign	Austria	4	10
Foreign	Australia	11	18
Foreign	Armenia	1	1
Foreign	Argentina	8	15
Foreign	Angola	1	1
Foreign	Andorra	1	1
Foreign	Algeria	1	1
Foreign	Albania	3	4
Foreign	Afghanistan	1	1
Unknown	Unknown	3	3

LEP Fixed Route Driver Survey

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Executive Order 13166, titled Improving Access to Services for Persons with **Limited English Proficiency (LEP)**, indicates that differing treatment based upon a person’s inability to speak, read, write or understand English is a type of national origin discrimination.

As a result, to ensure compliance with the above federal regulations, University of Minnesota Parking & Transportation Services has developed a Limited English Proficiency Plan to help identify reasonable steps for providing language assistance to persons with **limited English proficiency [LEP]** who wish to access services provided by University of Minnesota Parking & Transportation Services. An LEP person is defined as person who does not speak English as their primary language and have limited ability to read, speak, write or understand English.

One component of University of Minnesota Parking & Transportation Services’ Limited English Proficiency Plan includes a driver survey to help assess the number and frequency that LEP persons use its services. Please complete the survey by **October 31, 20xx** and return to the **PTS Office**. *Your Driver Badge ID and completion date must be filled in below*. Your assistance is greatly appreciated.

Thank you.

LEP Survey Questions:

1. In the past 30 days, do you recall coming into contact with LEP bus riders while driving a University of Minnesota bus?
a. ___ Yes b. ___ No (Check one response – If yes, continue to question 2, if no, your survey is complete).
2. If yes to question 1, on average, how many times a week do you come into contact with LEP bus riders while driving a University of Minnesota bus? _____
3. If yes to question 1, on average, how many times a week do you provide assistance to LEP bus riders while driving a University of Minnesota bus? _____
4. If yes to question 1, if known, please list the non-English languages spoken by the LEP bus riders you encountered on the University of Minnesota buses:

Driver Name and Badge ID # _____

Date Completed _____

Dial-A-Ride Survey of Drivers and Customer Service Reps

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Executive Order 13166, titled Improving Access to Services for Persons with Limited English Proficiency (LEP), indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination.

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One component of University of Minnesota Parking & Transportation Services' Limited English Proficiency Plan includes a driver survey to help assess the number and frequency that LEP persons use its services. Please complete the survey by **March 1, 2020** and return to the University of Minnesota Parking & Transportation Services or to your Supervisor. Your name or Driver Badge ID and completion date must be filled in below. Your assistance is greatly appreciated. Thank you.

1. In the past 30 days, do you recall coming into contact with LEP customers while driving a University of Minnesota Parking & Transportation Services Dial-A-Ride bus or on the phone as Customer Service Rep?

a. ___ Yes b. ___ No (Check one response – If yes, continue to question 2, if no, your survey is complete).

2. If yes to question 1, on average, how many times a week do you come into **contact** with LEP customer? _____

3. If yes to question 1, on average, how many times a week do you **provide assistance** to a LEP customer? _____

4. If yes to question 1, if known, please list the non-English languages spoken by the LEP customer you encountered: _____

Driver Name _____

Driver or Customer Service Reps (Circle One)

Date Completed _____

Log to Record Inquiries for Requests for Interpreters and Requests for Translated University of Minnesota PTS Documents

Date of Inquiry or Request: _____

Request for Interpreter: _____ yes _____ no

Language _____

Request for Translated Document: _____ yes _____ no

Language _____

Name of Document _____

Contact Info for Person Making the Request

Summary of Action and Conclusion

