

SECTION 10: LIMITED ENGLISH PROFICIENCY (LEP) POLICY**BACKGROUND & INTRODUCTION**

On August 11, 2000, the President signed E.O. 13166, "Improving Access to Services for Persons with Limited English Proficiency." The Executive Order requires Federal agencies to examine the services they provide, identify any need for services to those with limited English proficiency (LEP), and develop and implement a system to provide those services so LEP persons can have meaningful access to them. It is expected that agency plans will provide for such meaningful access consistent with, and without unduly burdening, the fundamental mission of the agency.

The Executive Order also requires that the Federal agencies work to ensure that recipients of Federal assistance provide meaningful access to their LEP applicants and beneficiaries. Executive Order 13166 applies to all federal agencies, all programs and operations of entities that receive funding from the federal government, including state agencies, local agencies and governments, private and non-profit entities, and sub-recipients.

KEY LIMITED ENGLISH PROFICIENCY POLICY COMPONENTS

Federally assisted recipients are required to make reasonable efforts to provide language assistance to ensure meaningful access for LEP persons to the recipient's programs and activities. To do this, the recipient should:

1. Conduct the four-factor analysis;
2. Develop a Language Access Plan (LAP);
3. Provide appropriate language assistance.

The actions that the recipient may be expected to take to meet its LEP obligations depend upon the results of the four-factor analysis including the services the recipient offers, the community the recipient serves, the resources the recipient possesses, and the costs of various language service options. All organizations would ensure nondiscrimination by taking reasonable steps to ensure meaningful access for persons who are LEP.

As part of its Title VI update, the Macatawa Area Express Transportation Authority (MAX) has developed the following Limited English Proficiency Policy. The plan's contents are consistent with the guidance on an effective language implementation plan expressed in Section VII of the U.S. Department of Transportation's Policy Guidance Concerning Recipients' responsibilities to Limited English Proficient (LEP) Persons [Federal Register: December 14, 2005] (Volume 70, Number 239).

The following policy explains to the transit agency staff the need to undertake language assistance activities including the following activities that are recommended in the DOT LEP Guidance on an implementation plan.

The U.S. Department of Justice, Civil Rights Division has developed a set of elements that may be helpful in designing an LEP policy or plan. These elements include:

1. Identifying LEP individuals who need language assistance;
2. Providing language assistance measures;
3. Training staff;
4. Providing notice to LEP persons of the availability of language assistance;
5. Monitoring and updating the LEP Policy.

This policy details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, the training of staff, how to notify LEP persons that assistance is available, and information for future plan updates.

FOUR FACTOR ANALYSIS

The DOT guidance outlines four factors recipients should apply to the various kinds of contacts they have with the public to assess language needs for ensuring reasonable and meaningful access for LEP persons:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of MAX;
2. The frequency with which LEP individuals come in contact with MAX;
3. The nature and importance of the program, activity, or service provided by MAX to the LEP Community;
4. The resources available to MAX and the overall cost.

The greater the number or proportion of eligible LEP persons; the greater the frequency with which they have contact with a program, activity, or service; and the greater the importance of that program, activity, or service, the more likely enhanced language services will be needed. Smaller recipients with more limited budgets are typically not expected to provide the same level of language service as larger recipients with larger budgets. The intent of DOT's guidance is to suggest a balance that ensures meaningful access by LEP persons to critical services while not imposing undue burdens on small organizations and local governments.

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

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

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

The U.S. Census Bureau's *2021 American Community Survey 5-Year Estimates* has a range of four classifications of how well persons speak English. For planning purposes, we are considering people that speak English less than "very well" as Limited English Proficient persons.

Table 1: Population 5 Years Old & Older Speaking a Language Other than English at Home, with any change from the last plan update noted in parenthesis.

JURISDICTION	POPULATION 5 YEARS OLD & OLDER (GAIN/LOSS)	SPEAK A LANGUAGE OTHER THAN ENGLISH AT HOME (GAIN/LOSS)	PERCENT SPEAKING A LANGUAGE OTHER THAN ENGLISH AT HOME (DIFFERENCE +/-)
HOLLAND, CITY OF	32,392 (+940)	5,111 (-466)	15.8% (-1.9)
HOLLAND CHARTER TWP.	36,045 (+597)	8,834 (-1,663)	24.5% (-5.1)
ZEELAND, CITY OF	5,350 (+240)	227 (-215)	4.2% (-4.5)
PARK TWP.	17,716 (-80)	1,504 (-49)	8.5% (-0.2)

Table 2: Among the Languages Spoken at Home, the Proportion of Population 5 Years Old or Older Speaking English Less Than “Very Well.”

	SPANISH, SPEAKING ENGLISH LESS THAN “VERY WELL.”	OTHER INDO- EUROPEAN, SPEAKING ENGLISH LESS THAN “VERY WELL.”	ASIAN & PACIFIC ISLANDER, SPEAKING ENGLISH LESS THAN “VERY WELL.”	OTHER LANGUAGES, SPEAKING ENGLISH LESS THAN “VERY WELL.”
HOLLAND, CITY OF	3.9% (-1.2)	0.1% (0.0)	0.9% (+0.2)	0.1% (-0.1)
HOLLAND CHARTER TWP.	5.7% (-1.5)	0.8% (+0.1)	3.4% (-0.5)	0.1% (+0.1)
ZEELAND, CITY OF	1.1% (-1.0)	0.5% (-0.6)	0.0% (-0.1)	0.0% (0.0)
PARK TWP.	2.5% (+0.8)	0.2% (-0.1)	0.7% (-0.1)	0.0% (0.0)

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

An established Latinx/Spanish-speaking community resides within the MAX service area, the population primarily concentrated within the city limit of Holland and in portions of Holland Charter Township, with fewer numbers reported within the city limit of Zeeland and in Park Township. MAX assessed the frequency with which staff and drivers have—or could have—contact with LEP persons, and includes vehicles operators, dispatchers, supervisory staff, and customer service representatives.

To date the most frequent contact between LEP persons is with bus drivers, and customer service staff that either field incoming phone calls or handle walk-in customers at the front desk. Currently, MAX employs four (4) bus drivers, one (1) Road Supervisor, one (1) Utility Supervisor, and one (1) Administration staff (Executive Director) who are bilingual in Spanish; four (4) bilingual telephone operators assist Spanish-speaking LEPs at the main passenger transfer and service center—at nearly all times, at least one is available during daily service hours.

Reserve-A-MAX travel training is also available upon request, with a Spanish-speaking staff member provided when requested, and is made available free-of-charge.

As part of its Limited English Proficiency Policy, MAX will work with staff to recognize, identify, and record the frequency with which persons identified as specific Asian language-speaking LEPs (with fewer but notable numbers within the service area, primarily in Holland Township) come into contact with MAX staff.

Possible contact points include but are not limited to: Community marketing events, telephone inquiries, service center walk-in visits, day-to-day bus route operations, or written or verbal inquiries or outreach, formal or informal, from related local groups and organizations. Based upon findings and occurrences, including ongoing demographic trends, MAX will routinely evaluate the need and feasibility of providing print information and/or direct language assistance in specific languages other than English and Spanish as part of its LEP program reviews.

FACTOR 3: THE NATURE AND IMPORTANCE OF THE SERVICE PROVIDED TO THE LEP COMMUNITY

Without a conscious effort from federal recipients to make available adequate and necessary information to all persons, some populations may not have fair and equal access to important, perhaps life-saving services. MAX recognizes that access to transportation is crucial to many populations, regardless of background.

As the provider of public transportation for the greater Holland-Zeeland area, MAX does not provide direct emergency services or assistance to the community in situations that potentially have serious or life-threatening implications on an LEP individual, especially compared to services such as health, emergency transportation, utilities, fire/police protection, and other emergency services.

The Macatawa Area Express Transportation Authority does understand its role within the community and operates in full agreement with the U.S. Department of Transportation's Limited English Proficiency Guidance Section V (4) recognizing that the inability of an LEP person to effectively utilize public transit (due to a language barrier) could in fact adversely affect his or her ability to obtain quality health care, child care, education, or access to employment opportunities within the service area.

Based on the demographic analysis and the frequency of contact with the available services, MAX considers access to its fixed routes and demand-response services within the local service area as essential with respect to the area's LEP population. MAX will continue to assess the relative impact of these services on LEP individuals and employ effective means to provide language assistance for LEP persons to ensure meaningful access.

HOLLAND-AREA ORGANIZATIONS SERVING LIMITED ENGLISH PROFICIENCY (LEP) INDIVIDUALS

The listing below identifies organizations MAX has either partnered with in the past or has contacted seeking input on its LEP Policy and whether any issues or barriers are known to exist with respect to local transit services. Copies of the LEP Policy will be submitted at least annually to each organization listed below both for awareness purposes and to open the Policy as well to public feedback—all to better serve the community as a whole:

Holland Public Schools, Melissa Remillard, Assistant Superintendent of School Improvement

320 W. 24th St., Holland MI 49423

616.494.2017, mremilla@hollandpublicschools.org

Lao Christian Reformed Church, Lee Khang, Reverend

940 Royce Ave., Holland MI 49423

616.719.7319, lee.khaab@gmail.com

Latin Americans United for Progress, Johnny Rodriguez, Executive Director

430 W. 17th St., Suite 31, Holland MI 49423

616.888.7225, johnny@laup.org

**Lighthouse Immigrant Advocates, Sarah Yore-Van Oosterhout, Esq.,
Founder; Managing Attorney & Advocacy Director**

412 W. 24th St., Holland MI 49423

616.298.8984, syore@lia-michigan.org

FACTOR 4: THE RESOURCES AVAILABLE AND THE OVERALL COST

Although current resources remain limited, MAX continues to provide Spanish-language translations that are included or available separately in bus schedules, brochures, service announcements, and pre-street closure bus stop notices. Bilingual staff also assist Spanish-language LEP persons, and these same staff members attend or accompany others to selected community events and outreach opportunities where the need for their skills is expected. MAX has Spanish-language "vital" documents and translation of its website (which now includes multiple languages) as part of its LEP planning.

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

IDENTIFYING LEP INDIVIDUALS WHO NEED LANGUAGE ASSISTANCE

To help identify and record the primary language of a Limited English Proficiency individual, MAX staff will make use of a language identification listing during any such initial encounters, and to report the encounter directly to the transit system's Title VI coordinator. Additionally, review of the translation service billing cycle will be used as a system double-check, which lists encounter dates, times, and languages used.

The official listing to be utilized by MAX Transit, the 2004 Census Test Language Identification Flashcard, has been developed by the U.S. Census Bureau and contains a check box with the phrase "Mark this box if you read or speak (name of each language)" listed in 38 different languages. The flashcard is used by governmental and non-governmental agencies to identify the primary language of LEP individual during face-to-face contacts. The Language Identification Flashcard has been made available at the front desk of the MAX Transit main transfer station, the Padnos Transportation Center.

MAX staff are also instructed to utilize the Language Identification Flashcard and to report any contacts made during other instances where LEP contact may occur, such as public meetings, workshops, or community events.

Documentation forms for reporting LEP contact are found in the LEP Plan binders for office staff use, and additionally on each bus driver's daily time sheets. These forms are reviewed by the Title VI coordinator, directly to whom LEP contacts can also be reported. Through the use of such cards and double-checks, MAX Transit will be better able to record any contact with an LEP individual.

PROVIDING LANGUAGE ASSISTANCE MEASURES

In compliance with the "safe harbor" threshold, Spanish-language assistance will be provided for LEP individuals through the translation of key or "vital" documents and materials, as well as through oral language interpretation when necessary and when possible. Translation of all MAX Transit plans and materials is not possible due to cost restrictions and secondary population levels that do not warrant such measures.

MAX Transit continues to provide Spanish-language bus schedules, bus stop pre-closure notices, and "how to" guides among its inventory of translated brochures. In addition, the transit system's website offers a Spanish-translation version—as well as ten (10) additional language options—through the use of translation software.

Spanish-language staff are available to assist with written communications and document translation requests. Spanish-language staff members also assist customers who are Spanish-speaking LEPs.

Beyond this scope, MAX has contracted with AAA Translation to provide language translations services in more than 150 languages. Additionally, Google Translate—a free, web-based translation service—is available for use by either office staff, or by MAX bus operators, accessed through onboard vehicle tablets.

As part of the LEP Policy, "vital" documents (those documents deemed necessary to understanding the transit system's policies and safety measures, and for utilizing all available services) have been identified and translated into Spanish. Examples of these documents include the demand-response No-Show Policy, No-Show infraction letters, Title VI policies and complaint forms, ADA Assessment Applications, holiday-related service notices, and the MAX system's general Comment/Complaint form.

Since MAX is unable to determine which recipients of No-Show letters might be LEPs, the English version of the letter contains a line in Spanish notifying the reader to call the offices to request a Spanish-Language letter. A similar format will be used on future documents routinely mailed and have been deemed "vital" by the MAX Transit system.

Written correspondence, regardless of language, is to be directed through the Transit Specialist/Administrative Assistant, where the document can be translated either through internal or external sources. A professional response or action

can be determined, and a translation made back into the original language for return to the original LEP individual.

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

- (2) Mandarin Chinese
- (2) Vietnamese
- (1) Cantonese Chinese
- (1) Laotian
- (1) Brazilian Portuguese
- (1) Polish
- (1) Urdu
- (4) Spanish*

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

During the above documented encounters, use of the Language Identification Flashcard, and Google Translate or the AAA Translation service assisted staff in meeting each LEP's needs. When needed, the transit system has selected and continues to provide for financially, on an on-demand basis (rather than under contract), the following organization for language interpretation services, for no cost to Limited English Proficiency individuals:

AAA Translation
17295 Chesterfield Airport Rd., Suite 200
Chesterfield MO 63005
888-263-0481
www.aaatranslation.com

No complaints were received in the preceding four (4) years concerning MAX's failure to meet LEP needs.

TRAINING OF STAFF

Members of the MAX Transit staff will be made aware of their obligations to provide meaningful access to information and services for Limited English Proficiency individuals, and will be properly trained. MAX will provide an LEP review for current employees on an annual basis and will include LEP training as part of the new employee orientation process. Management staff will also be made aware of the processes in place so they can reinforce its importance and ensure its implementation by staff.

Staff training will include, but is not limited to the following:

- Understanding the Title VI LEP responsibilities;
- Background on LEP populations within the service area;
- Description of the type of language assistance MAX currently provides, including use of the LEP language identification flashcards;
- How to use the AAA Translation and Google Translate language assistance services;
- Documentation of LEP language assistance requests;
- How to handle a potential Title VI / LEP complaint.

In key areas, the step-by-step instructions in the following section have been outlined—and as part of training—will be distributed to all transit system Customer Service and Bus Operator staff in event contact is received from an LEP person in need of interpretation services.

INSTRUCTIONS FOR LANGUAGE INTERPRETATION ASSISTANCE**BUS OPERATORS:**

It may be difficult for a non-bilingual bus operator to provide assistance to a Limited English Proficiency person who boards the vehicle requesting information.

In such circumstances, bus operators are **required** at a minimum to:

1. Ask if another passenger on the vehicle could serve as a translator;
2. Provide the phone number to the agency's transfer center customer service desk, which will provide translation services;
3. Direct the LEP person to a translated schedule placed aboard the vehicle;
4. If a riding passenger, direct them to the transfer center, where language assistance is available.

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

PLEASE NOTE: COMPLETE INSTRUCTIONS ARE AVAILABLE IN APPENDIX J.

Things to keep in mind when using Google Translate:

1. You may need to try different languages if initially unknown;
2. Use short, simple terms for translation (translations can be read visually and/or read audibly);
3. **IMPORTANT!** Document the encounter by completing the Title VI/LEP section on the bottom of your Driver's Sheet (see Page 29).

CUSTOMER SERVICE/PHONE OPERATORS:

NOTE: It is against federal law to charge any service fees to a Limited English Proficiency individual. All associated fees must be paid for by Macatawa Area Express (MAX).

AAA TRANSLATION (AVAILABLE IN ADDITION TO GOOGLE TRANSLATE):

If an interpreter is unavailable in the office, follow the instructions shown below. It only takes four simple steps to get connected with an interpreter:

Step 1

Use the Language Flashcard to identify the customer's language.

Step 2

Call AAA Translation: 1-888-263-0481

Step 3

Enter MAX Transit's PIN Code, and you'll be speaking with an Interpreter within seconds.

Step 4

Remember to document the LEP encounter with the form shown on Page 29.

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

AAA Translation offers:

- Language interpreting & translation services for more than 150 languages.
- U.S. cost is \$2.25 per minute, billed in one-minute increments.
- 24 hours, 7 days a week, 365 days a year.
- On-demand, pay-as-you-go service plan.

POLICY REGARDING THE USE OF INTERPRETERS/TRANSLATORS

IMPORTANT: Interpreters and translators should not deviate into a role as counselor, legal advisor, or any other role aside from interpreting or translator.

General Guidelines:

1. Be sure to always speak directly to your customer, not to the interpreter;
2. Always use words, not body language or gestures, to convey meaning;
3. Speak audibly and in a positive tone;
4. Always speak slowly and clearly;
5. Do not allow the customer to wait alone, or over extended periods;
6. Be prepared to explain technical terms or jargon to the interpreter, especially if the interpreter is unfamiliar with mass transit;
7. When communicating, be sure to use simple vocabulary and easy-to-understand terms;
8. Use short sentences, pausing frequently to allow the interpreter to speak;
9. Ask one question at a time;
10. Do what you can to control the environment.

To help assist the customer, remember to keep the following in mind:

1. Ask your customer if they feel they understand your question and if they need to ask any questions themselves;
2. Ask your customer if they need anything re-explained. If your message is not clearly understood, be prepared to say it differently;
3. If you think that your message may not be fully understood by your customer, double check by saying "Tell me what you understand."

To help assist the interpreter, remember to keep the following in mind:

1. Allow the interpreter the time needed to provide the clearest interpretation;
2. Allow the interpreter to stop you and seek clarification when appropriate;
3. Allow the interpreter to take notes if things get complicated;
4. Allow the interpreter to clarify cultural issues, if necessary.

LISTING OF BILINGUAL STAFF

<u>Name:</u>	<u>Job Title:</u>	<u>Language:</u>
Junior Beltran	Bus Operator	Spanish
Jacinto Flores	Bus Operator	Spanish
Elisa Hoekwater	Executive Director	Spanish
Leandro Montes	Bus Operator	Spanish
Nicandro Sanchez	Utility Supervisor	Spanish
Andrea Rubio	Information Specialist	Spanish
Jacob Trevino	Road Supervisor (AM)	Spanish
Alyssa Valderas	Information Specialist	Spanish
Jessica Valderas	Information Specialist	Spanish
Tawney Valderas	Info. Specialist/Human Resources Assistant	Spanish
Noe Ybarra	Bus Operator	Spanish

LIMITED ENGLISH PROFICIENCY (LEP) CONTACT DOCUMENTATION FORM:**LEP Documentation Form:**

Date of contact ____/____/____

Location of contact: _____

Name of staff member filling out form: _____

Indicate language of LEP customer: SPANISH Other: _____

Did the LEP customer purchase a bus pass? (Circle one) YES NO

How were the LEP language needs met? (Circle one) MAX TRANSLATOR AAA TRANSLATIONS GOOGLE TRANSLATE

Please describe the nature of the LEP customer's visit:

Were their needs met by the end of the visit? YES NO

Return completed form to: Charles Veldhoff, Compliance Analyst/EEO Officer

LEP Documentation Form/Bus Operators (SHOWN IN YELLOW BELOW ON THE FIXED ROUTE FORM):

MAX TIME RECORD SHEET FIXED ROUTE													
DATE		ROUTE		BUS NO		DRIVER NAME							
AM ROUTE					PM ROUTE								
TIME					TIME								
CLOCK IN		<input style="width: 100px;" type="text"/>			CLOCK IN		<input style="width: 100px;" type="text"/>						
		Odometer					Odometer						
DEPART GARAGE		<input style="width: 100px;" type="text"/>			DEPART FIXED RTE END		<input style="width: 100px;" type="text"/>						
ARRIVE FIXED RTE START		<input style="width: 100px;" type="text"/>			ARRIVE AT GARAGE		<input style="width: 100px;" type="text"/>						
CLOCK OUT		<input style="width: 100px;" type="text"/>			CLOCK OUT		<input style="width: 100px;" type="text"/>						
FUEL STOPS													
	BUS #	GALLONS	MILEAGE	TIME IN	TIME OUT								
BUS 1													
BUS 2													
BUS 3													
BUS SWITCH OUT													
	BUS #	TIME IN	TIME OUT	BEG ODOM	END ODOM								
OTHER DRIVER INFORMATION													
CHECK ALL LIGHTS					Google Translate - TITLE VI/LEP DOCUMENTATION								
LOG OFF TABLET					Which Language required Translation? _____								
POWER TABLET DOWN					Were you able to successfully assist the passenger today? YES NO								
COMPLETE PAPERWORK					Which Language required Translation? _____								
DID YOU HAVE A LUNCH? YES / NO					Were you able to successfully assist the passenger today? YES NO								
LUNCH START:					Which Language required Translation? _____								
LUNCH END:					Were you able to successfully assist the passenger today? YES NO								
HOURLY WALKTHROUGH CHECKS													
<input type="checkbox"/> 6AM	<input type="checkbox"/> 7AM	<input type="checkbox"/> 8AM	<input type="checkbox"/> 9AM	<input type="checkbox"/> 10AM	<input type="checkbox"/> 11AM	<input type="checkbox"/> 12PM	<input type="checkbox"/> 1PM	<input type="checkbox"/> 2PM	<input type="checkbox"/> 3PM	<input type="checkbox"/> 4PM	<input type="checkbox"/> 5PM	<input type="checkbox"/> 6PM	<input type="checkbox"/> 7PM

NOTICE OF THE AVAILABILITY OF LANGUAGE ASSISTANCE

The Macatawa Area Express (MAX) has established the following methods to inform Spanish-speaking LEP individuals, supporting organizations—as well as the general public—of available no-fee LEP services.

- An English/Spanish sign (see sample in APPENDIX A) has been incorporated into the Title VI statement and has been posted at the front entrance of the transit system’s central transfer center. The notice will also allow for LEPs traveling between cities to learn of language interpretation services. The central transfer center also serves Amtrak passengers and inter-city bus lines. In the past, MAX Transit staff has assisted Spanish-speaking LEPs using transportation other than our own, and will continue to do so when needed;
- A phrase in English/Spanish has been added to reprints of the master bus schedules, reminding passengers of the availability of language services offered by MAX Transit, free of charge;
- When possible, MAX Transit will have present at least one Spanish-speaking member of the staff at any public meeting intended for educational purposes or for gathering community input. Spanish-speaking staff will be on-hand to serve LEPs during community marketing events and shows, when possible, especially given scenarios where demographics point to a higher probability of participation by Spanish-speaking LEPs;
- A notice has been posted on the MAX Transit website www.catchamax.org under the “Contact Us” section notifying visitors of the availability of language assistance at no cost to the user. The notice can be translated into ten (10) languages through use of the website’s translation feature;
- On an annual basis MAX will mail/email copies of its LEP Policy to seek input from local organizations who serve the LEP population (list shown on Page 24), while at the same time notifying them of available language services offered by the transit system.

Current budget and staff limitations do not allow for the implementation of all available notification techniques. However, MAX will consider additional notification options in the future, especially those suggested from within the local LEP community.

MONITORING & UPDATING THE LEP POLICY

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

Each update will include but will not be limited to a review of the following information:

- Feedback and frequency from documentation/recorded LEP encounters;
- Establishing whether or not LEP needs have been met through existing assistance;
- Nature and importance of activities to LEP persons;
- Evaluating local population/demographic changes, particularly among LEPs;
- Feedback from LEP individuals or community organizations, or participation in public meetings;
- A review of whether any complaints have been received;
- Availability of resources and the costs imposed.

PUBLIC PARTICIPATION & DISSEMINATION OF THE LEP POLICY

The Macatawa Area Express will continue cultivating relationships with community agencies that serve LEP populations. LEP engagement may include attending already existing community meetings and gatherings—such as school meetings, farmers markets, faith-based events, and other community activities—in order to reach LEP populations who may not attend hosted events.

Additionally, more directly targeted LEP engagement efforts to be utilized by the Authority include:

- Ensuring that non-English language interpretation will be made at any public meeting or workshop, as is appropriate or necessary;
- Utilizing bilingual postings on all buses and transit-related public facilities;
- Posting any event information in both English and Spanish, as deemed necessary;
- Distributing event information to community groups and agencies that work with LEP populations, through both contact lists and postings on social media;
- Making notices bilingual, or using Spanish-language notices alongside English notices, as deemed necessary;
- As appropriate or necessary, having non-English language interpretation available in additional languages.

MAX will continue assessing the language needs of citizens in its service area through its Language Assistance Plan. As such time—as additional groups with limited English proficiency reach significant numbers—MAX will review this plan and its strategies for engaging with non-English speaking populations.

The public participation process will be augmented with specific outreach activities appropriate for the particular projects, such as additional public workshops, focus groups, and surveys. As funding permits, multiple public hearings or workshops may be held at varying times to accommodate different schedules. Public participation events will be held at central locations close to bus stops, short of accentuating circumstances dictating otherwise. These projects may also require the development of special materials such as fact sheets, newsletters, project webpages, and additional social media and press releases.

MONITORING OF SUB-RECIPIENTS

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

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

GENERAL LEP POLICY INFORMATION

The MAX Transit LEP Policy is posted on the website www.catchamax.org. For individuals without internet services, the Herrick Public Library in downtown Holland offers web access free-of-charge. Following updates, the LEP Policy will be provided to local community organizations serving LEP individuals.

The Plan will be available upon request in hard copy at the Padnos Transportation Center. Requests will also be fulfilled via mail, or sent electronically in PDF format over email.

Questions or comments regarding the LEP Policy should be directed to:

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

Phone: 616.928.2494

Fax: 616.928.2467

Email: c.veldhoff@catchamax.org