

# *Minot City Transit*

## *Title VI Plan*



Plan Updated January 20, 2017

Approved by Minot City Council

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Authorized Signature/Title

Date of Approval

**City of Minot  
1025 31<sup>st</sup> ST SE  
Minot, ND 58701**

**Phone: (701)857-4148  
Fax: (701)837-3684**

Title VI prohibits discrimination in all Federal Transit Administration (FTA) services, programs, or benefits on the basis of Race, Color, or National Origin.

### **Title VI Program**

FTA Circular 4702.1B, Chapter III for FTA Subrecipient:

Title VI Requirements & Guidelines for FTA Recipients at

<https://www.transit.dot.gov/regulations-and-guidance/fta-circulars/title-vi-requirements-and-guidelines-federal-transit>

The Federal Transit Administration Title VI Circular 4702.1B provides guidance to grantees on how to comply with Title VI regulations, as well as to ensure grantees provide meaningful language access to persons who are limited English proficient. The circular provides specific compliance information for each type of grantee and provides comprehensive appendices including additional guidance and examples to ensure recipients understand the requirements.

By filling out the required fields you are stating that your board of directors, appropriate government entity, or officials responsible for policy decisions and/or approval of board meeting minutes understand the required FTA Circular 4702.1B, Chapter III regulations and agree to adopt all Title VI Program guidelines:

Date: January 20, 2017

Title VI Contact Name: Lisa Jundt, Human Resources Director

Title VI Contact Phone: (701) 857-4753

Title VI Contact Email: lisa.jundt@minotnd.org

Title VI Program Requirements

[Attach a copy of the meeting minutes approving this action.]

Title VI Program Requirement

## **1. SUBRECIPIENT TITLE VI AND NON-DISCRIMIINATION POLICY STATEMENT**

The City of Minot, hereinafter referred to as the “LPA” is committed to compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration act of 1987, and all related regulations and statutes. The LPA assures that no person or group(s) of persons shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any and all programs, services, or activities administered by the LPA, regardless of whether those programs and activities are federally funded or not.

The LPA also assures that every effort will be made to prevent discrimination through the impacts of its programs, policies, and activities on minority and low-income populations. In addition, the LPA will provide meaningful access to services for persons with Limited English Proficiency.

In the event the LPA distributes federal-aid funds to a sub recipient, the LPA will include Title VI language in all written agreements and will monitor for compliance.

The LPA’s Title VI Coordinator Lisa Jundt, Human Resource Director, phone – 701-857-4753, [lisa.jundt@minotnd.org](mailto:lisa.jundt@minotnd.org), is responsible for initiating and monitoring Title VI activities, preparing reports and other responsibilities as required by 23 Code of Federal Regulations (CFR) 200 and 49 CFR 21.

This policy statement is posted in the Minot City Transit office and can be found on the City of Minot Website at [www.minotnd.org](http://www.minotnd.org).

An abbreviated “Statement of Non-discrimination” is posted in all Minot City Transit buses and vans.

## **2. COMPLAINT FORM AND PROCEDURES:**

### **Scope of Title VI Complaints**

The scope of Title VI covers all external City of Minot Activities. Adverse impacts resulting in Title VI complaints can arise from many sources, including advertising, bidding, and contracts

Complaints can originate from individuals or firms alleging inability to bid upon or obtain a contract with the City of Minot for the furnishing of goods and/ or services. Examples include selection of contractors, subcontractors, material and equipment suppliers, lessors, vendors, consultants, fee appraisers, universities, etc.

Complaints can originate as a result of project impacts on individuals or groups. For example, social and economic, traffic, noise, air quality, access, accidents, and failure to maintain facilities.

## Formal Title VI Complaint Procedure

The City of Minot's Title VI Policy assures that no person or group(s) of person shall, on the grounds of race, color, or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any and all programs, services, or activities administered by the LPA, regardless of whether those programs and activities are federally funded or not. The LPA also assures that every effort will be made to prevent discrimination through the impacts of its programs, policies, and activities on minority and low-income populations.

The City of Minot uses the following detailed, internal procedures for prompt processing of all Title VI complaints received by it. These procedures include but are not limited to:

1. Any person or groups of persons who believe they have been aggrieved by an unlawful discriminatory practice under Title VI may individually, or through a legally authorized representative, make and sign a complaint and file the complaint with the City of Minot. Allegations received do not have to use the key words "complaint," "civil rights," "discrimination," or their near equivalents. It is sufficient if such allegations imply any form of unequal treatment in one or more of the City of Minot's programs for it to be considered and processed as an allegation of a discriminatory practice.
2. The complaint **must** be filed, in writing, no later than 180 calendar days after the date of the alleged discrimination. The City of Minot's Title VI Complaint Form must be used.
3. The complaint may also be filed with the North Dakota Department of Transportation Title VI Liaison Officer, NDDOT, 608 East Boulevard Avenue, Bismarck ND 58505-0700. The complaint **must** be filed, in writing, no later than 180 calendar days after the date of the alleged discrimination, unless the time for filing is extended by the NDDOT Title VI Liaison Officer.
4. The complaint may also be filed with the Secretary, U.S. Department of Transportation, Departmental Office of Civil Rights, 1200 New Jersey Ave, S.E. Washington, DC 20590. The complaint must be filed, in writing, no later than 180 days after the date of the alleged discrimination, unless the time for filing is extended by the Secretary, U.S. Department of Transportation.
5. Immediately, upon receipt of a Title VI complaint, it is referred and reported to the appropriate department head and the Title VI Coordinator for processing.
6. The City of Minot will review and determine the appropriate action regarding every complaint. The City of Minot will decide not to proceed with or continue a complaint investigation if:
  - a. The complaint is, on its face, without merit.
  - b. The same allegations and issues of the complaint have been addressed in a recently closed investigation or by previous federal court decisions

- c. The complainant's or injured party's refusal to cooperate (including refusal to give permission to disclose his or her identity) has made it impossible to investigate further.
7. If an investigation is to be initiated, the City of Minot determines the method of investigation and who will conduct the investigation. The entire investigation process, including the submission of the final report of the investigation and recommendations to the City Manager from the investigating party is to be carried out in a period not to exceed sixty (60) calendar days from the date the original complaint was received by the City of Minot
8. The City of Minot acknowledges receipt of the allegation(s) within ten (10) working days. The complainant is notified of the proposed action to be taken to process the allegations(s). The notification letter contains:
  - a. The basis for the complaint.
  - b. A brief statement of the allegation(s) over which the City of Minot has jurisdiction.
  - c. A brief statement of the City of Minot's jurisdiction over the recipient to investigate the complaint.
  - d. An indication of when the parties will be contacted.
  - e. Depending on the nature of the complaint, the complaint will be referred to the City Manager for final Decision
9. The investigation consists of an in-depth, personal interview with the complainant(s). Information gathered in this interview includes but is not limited to: identification of each complainant by race, color, sex, age, national origin, disability/handicap, or income status; name of the complainant; a complete statement concerning the nature of the complaint, including names, dates, places, and incidents involved in the complaint; the date the complaint was filed; and any other pertinent information the investigator(s) feels is relevant to the complaint. The interview(s) is recorded, either on audio tape or by an investigator taking notes. The investigator(s) arranges for the complainant to read, make necessary changes to, and sign the interview transcript or interview notes.
10. Following the interviews, the investigator(s) develops a report of the investigation and recommendations based on the facts. The report contains the investigator's(s) findings, conclusions concerning each issue raised in the complaint, and recommendations for corrective action. The report is the last document prepared by the investigator(s). Any other actions taken as a result of the investigator's(s) findings and conclusions are the responsibility of the City of Minot management.
11. The complainant receives a letter from the City of Minot detailing the findings and any recommendations for corrective action to be taken based on the facts. All issues in the complaint are addressed. The complainant is informed that the final determination is made by the City of Minot Title VI Coordinator.
12. The City of Minot forwards the report of the investigation and recommendations to the City Manager. Included with the report is a copy of the complaint, copies

of all documentation pertaining to the complaint, the date the complaint was filed, the date the investigation was completed, and any other pertinent information.

13. The City Manager makes the final agency decision.

### **Informal Title VI Complaint Procedure**

1. Title VI complaints may be resolved by informal means. When informal means are used, the complainant is informed of his or her right to file a formal written complaint.
2. Any complaint received in writing is considered to be a formal complaint and is handled under the formal complaint procedure outlined above.
3. The City of Minot periodically informs the City Manager of the status of all informal complaints.
4. When a complaint has been directly filed with another governmental agency, the City of Minot is to be informed by the agency where the complaint has been filed and is to take whatever action is needed to resolve the complaint.

### **Title VI Complaint Form**

See attachment 1

### **3. Transit-Related Title VI Investigations, Complaints, and Lawsuits**

In order to comply, the City of Minot will prepare and maintain a list of any active investigations conducted by the City of Minot or, lawsuits naming the City of Minot and/ or its subcontractor(s) that allege discrimination on the basis of race, color, or national origin.

The list will include:

1. The date the investigation, lawsuit or complaint was filed;
2. A summary of the allegations(s);
3. The status of the investigation, lawsuit or complaint;
4. Actions taken by the City of Minot in response to the investigation, lawsuit or complaint.

To date, the City of Minot has no transit related Title VI complaints. Minot City Transit will submit SFN 60805 Transit Title VI – List of Investigations, Lawsuits, and Complaints along with this plan.

### **4. PUBLIC PARTICIPATION PLAN:**

Minot City Transit is committed to ensuring it serves the community fairly, consistently and in the most cost-efficient and appropriate manner using available resources. Through conversation and collaboration with riders, prospective riders, and local human service agencies, Minot City Transit continually assesses the quality of its service, measures potential impacts from Minot City Transit proposed initiatives and ensures that it is providing valuable services to the residents and visitors of the City of Minot. Public

participation is a vital part of the process. The City of Minot Voluntary Attendance Sheet (see attachment 2) will be utilized to collect statistical data for public participation.

### **Purpose of the Public Participation Plan**

As part of the Title VI Program, Minot City Transit, a division of the City of Minot, is bolstering its public participation processes and enhancing its strategies for engaging under-served groups, including those with limited English. This plan outlines the importance of and provides guidelines for involving the public in Minot City Transit's planning efforts to ensure that all groups are represented and their needs considered.

### **Public Participation Process**

A public participation process will be considered at the earliest stages of any Minot City Transit project that may impact the general public and/ or potential riders. As the scope of the projects vary in time and size, the public participation process may vary for each, as well as the extent of public participation.

Minot City Transit's public participation process ensures that:

1. Information about public participation opportunities will be advertised and/ or posted appropriately. Any public members with concerns or interests will have an appropriate opportunity to participate in decisions about Minot City Transit services and will be notified of these opportunities to provide input.
2. At the beginning of all projects staff will determine which strategies might have the highest potential to encourage public participation and best serve all those affected or possibly affected by the project, including those in the under-served communities. At any time during the project, it may be reevaluated and if appropriate, additional public participation activities will be explored.
3. Community involvement and contribution will be included in the development of the plans, passenger amenities and improvements at Minot City Transit
4. Comments and concerns of all persons or groups participating in the process will be considered in the development of the plans and locations of transit services and amenities.
5. At any time, members of the public are welcome to submit comments or concerns to Minot City Transit via email ([pwclerk@minotnd.org](mailto:pwclerk@minotnd.org)); in person at the Minot City Transit office in the Public Works Department building, 1025 31<sup>st</sup> Ave SE, Minot ND; by mail at P.O Box 5006, Minot, ND 58701; or by calling Minot City Transit at (701) 857-4148.

### **Public Participation Outreach Options**

Minot City Transit uses several strategies to provide interested parties with reasonable opportunities to be involved in the planning process. The following is a non-inclusive list of participation strategies and techniques that have been utilized:

1. Posting and/or distributing notices and/or flyers at key community locations and in buses; notifying stakeholders such as Health and Human Service Agencies, Minot Public Schools, and Minot State University.
2. Monthly Minot City Council meetings are open to the public for questions or comment on any Minot City Transit Services.
3. Rider surveys and interviews on board the transit vehicles; electronic surveys via website.
4. Utilize local media and news sources to inform the public of participation opportunities; news releases; public service announcements.
5. Posting information on the City of Minot website; posting on social media sites.

### **Beyond Minot City Transit's Public Participation Plan**

Minot City Transit is committed to serving the community and will continue providing public participation opportunities and outreach activities as well as execute various strategies to monitor the service area's transit needs against services provided and future plans.

### **Minot City Transit's Public Presence and Assistance**

In the past Minot City Transit has used various ways to engage, train, and distribute information to the public.

1. Conducting "Travel Training" for potential riders in order to help them understand how to use the website, ride the bus and interpret the bus route schedule
2. Attending coordination meetings with other local transportation agencies such as Souris Basin Transportation.
3. Coordinating with human service agencies to attend or present information at meetings.

### **Unmet Transit Needs Process**

Each year Minot City Transit in coordination with Souris Basin Transportation holds a publicly advertised meeting regarding paratransit services and unmet needs. This meeting is advertised in the local newspaper, on the City of Minot website and on social media. The community is invited to attend and comment on current services, planned services and any unmet needs.

### **Minot City Transit Comprehensive System Analysis**

In 2013 Minot City Transit had a Comprehensive System Analysis developed with funding from the North Dakota Department of Transportation. The final service plan was developed through an extensive community outreach effort. Throughout the outreach process, project planners presented key findings back to the community, allowing community members to fully integrate their values into the planning process. Community outreach activities that were conducted throughout the study were:

1. A community survey; an on board survey; and stakeholder interviews.
2. Meetings with a core group of city staff including, planners, the City Manager, Public Works Director, and the Finance Director.
3. Meetings with Minot Public School District to discuss needs of the students that use public transit.
4. A project website that was developed to provide information about the study, allow people to download documents, take a survey, and receive updates on the study.
5. Numerous media appearances encouraging members of the public to get involved.

The findings of the overall outreach effort provided the basis for the final service plan that was adopted by the City of Minot.

#### **5. LIMITED ENGLISH PROFICIENCY (LEP) PLAN:**

See attachment 3.

#### **6. FIXED ROUTE SERVICE STANDARDS (Only applicable if Fixed Route System)**

##### **Vehicle Load Standards**

The average of all loads during the peak operating periods should not exceed 1.3 passengers/seat.

The average of all loads during non-peak operating periods should not exceed 1.0 passenger/seat.

##### **Vehicle Headway Standards**

Minot City Transit operates all of its routes on a one-hour headway standard

##### **On-Time Performance Standards**

Minot City Transit's "on-time" performance standard prohibits vehicles from departing the transfer center at the Minot City Auditorium earlier than the posted departure time. Minot City Transit operates on a flag-stop type service. As there are no actual bus stops Minot City Transit strives to complete all routes "on time".

##### **Service Availability Standards**

Minot City Transit is a public transportation system, operating 6 fixed routes within Minot city limits Monday through Friday from 7:00 a.m. until 7:00 p.m. Minot City Transit contracts with Souris Basin Transportation to provide complimentary para-transit service within Minot city limits.

# MINOT CITY TRANSIT

## TRANSIT TITLE VI COMPLAINT FORM

**PART I - COMPLAINANT INFORMATION** (Print all items legibly.)

Name		Telephone
Street Address/P.O. Box		Email Address
City	State	Zip Code

**PART II - CAUSE OF DISCRIMINATION BASED ON** [Check all appropriate box(es).]

Race     Color     National Origin

**PART III - THE PARTICULARS ARE:** (Include names, dates, places, and incidents involved in the complaint.) [If additional space is needed, attach extra sheet(s).]


**PART IV - REMEDY SOUGHT** [State the specific remedy sought to resolve the issues(s).]


**PART V - VERIFICATION**

Complainant's Signature \_\_\_\_\_ Date \_\_\_\_\_

## Instructions

### GENERAL

1. Under Title VI of the Civil Rights Act of 1964 and the related statutes and regulations, no person or groups(s) of persons shall, on the grounds of race, color or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any and all programs, services, or activities administered by Minot City Transit. Any person or groups(s) of persons who feel they have been discriminated against may file a complaint.
2. Instructions provided within this form are not meant to be all inclusive. Complainants are responsible for all procedural requirements.
3. Complainants **must** include all required information and **must** meet all timeframes as defined in the **Minot City Transit** Title VI Complaint Procedure.
4. Legible copies of all available pertinent documentation should be attached to this form.
5. All inquiries should be directed to **City of Minot Human Resources Director, Minot City Transit, PO Box 5006, Minot ND, 58701, ph.: (701)857-4753.**

### PART I

Complete all information in this section.

### PART II

Check all boxes that apply indicating the basis for the complaint. The discrimination **must** be based on at least one of the listed categories.

### PART III

State the specific complaint in a manner that clearly identifies the issues upon which the complaint is based.

### PART IV

State the minimum remedy acceptable for resolution of this complaint.

### PART V

Sign and date this section to verify the information contained in Parts I through IV.

### Complaints filed with Federal Transit Administration

Discrimination complaints based on race, color, or national origin may be filed with the Federal Transit Administration at the FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590. The complaint **must** be filed, in writing, no later than 180 days after the date of the alleged discrimination, unless the time for filing is extended by the Secretary, U.S. Department of Transportation.

## Attachment 2 – City of Minot Voluntary Attendance Sheet



### Voluntary Attendance Sheet

The City of Minot monitors attendance to ensure equal opportunity. We appreciate your providing this information. This information will only be used to monitor attendance at meetings or affirmative action purposes.

Meeting/Topic: \_\_\_\_\_ Date: \_\_\_\_\_ Place: \_\_\_\_\_

**Please check the appropriate boxes**

<input type="checkbox"/> Male	<input type="checkbox"/> Female	<input type="checkbox"/> Disabled	<input type="checkbox"/> White	<input type="checkbox"/> Black	<input type="checkbox"/> Asian	<input type="checkbox"/> Hispanic	<input type="checkbox"/> American Indian/Alaskan Native
			<input type="checkbox"/> Native Hawaiian or other Pacific Islander				
<input type="checkbox"/> Male	<input type="checkbox"/> Female	<input type="checkbox"/> Disabled	<input type="checkbox"/> White	<input type="checkbox"/> Black	<input type="checkbox"/> Asian	<input type="checkbox"/> Hispanic	<input type="checkbox"/> American Indian/Alaskan Native
			<input type="checkbox"/> Native Hawaiian or other Pacific Islander				
<input type="checkbox"/> Male	<input type="checkbox"/> Female	<input type="checkbox"/> Disabled	<input type="checkbox"/> White	<input type="checkbox"/> Black	<input type="checkbox"/> Asian	<input type="checkbox"/> Hispanic	<input type="checkbox"/> American Indian/Alaskan Native
			<input type="checkbox"/> Native Hawaiian or other Pacific Islander				
<input type="checkbox"/> Male	<input type="checkbox"/> Female	<input type="checkbox"/> Disabled	<input type="checkbox"/> White	<input type="checkbox"/> Black	<input type="checkbox"/> Asian	<input type="checkbox"/> Hispanic	<input type="checkbox"/> American Indian/Alaskan Native
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			<input type="checkbox"/> Native Hawaiian or other Pacific Islander				

## Attachment 3 – City of Minot Limited English Proficiency Plan

### INTRODUCTION

This Limited English Proficiency Plan has been prepared to address the City of Minot's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English proficiency language skills. 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 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 funds, including all City of Minot departments receiving federal grant funds.

### Plan Summary

The City of Minot 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. As defined 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 City of Minot used the 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 by the City of Minot.
2. The frequency with which LEP persons come in contact with City of Minot services.
3. The nature and importance of services provided by the City of Minot to the LEP population.
4. The interpretation services available to the City of Minot and the overall cost to provide LEP assistance. A summary of the results of the four factor analysis is in the following section.

### MEANINGFUL ACCESS: FOUR-FACTOR ANALYSIS

*The number or proportion of LEP persons in the service area who may be served or are likely to require City of Minot services:*

The City of Minot reviewed the 2011-2015 American Community Survey 5-Year Estimates and determined that 2,482 people (5.8% of the population) in Minot speak a language other than English at home. Of those 2,265 people, 586 (23.6%) have limited English proficiency. In other words, they speak English less than "very well". Statistics show of the 586 that speak English less than "very well", 207 speak Spanish, 81 speak other Indo-European languages, and 220 speak Asian and Pacific Islander languages.

*The frequency with which LEP persons come in contact with City of Minot services:*

The City of Minot staff has reviewed the frequency with which City Council members and City staff have, or could have, contact with LEP persons. This includes documenting phone inquiries or office visits. To date, the City of Minot has had no requests for interpreters and no requests for translated program documents. The City of Minot staff have had very little contact with LEP persons.

*The nature and importance of services provided by the City of Minot to the LEP population:*

There is no large geographic concentration of any type of LEP individuals in the service area for the City of Minot. The overwhelming majority of the population, 94.2%, speak English. As a result, there are few social, service, professional and leadership organizations within the City of Minot service area that focus on outreach to LEP individuals. The City of Minot City Council and staff are most likely to encounter LEP individuals through office visits and phone conversations.

*The resources available to the City of Minot, and overall costs to provide LEP assistance:*

The City of Minot reviewed its available resources that could be used for providing LEP assistance and identified which of its documents would be most valuable to be translated if the need should arise. City employees will likely be available to provide Spanish translation if needed, and local citizens will likely be available to provide Spanish translation, and other languages will be interpreted through a telephone interpreter line for which the City would pay a fee.

## **LANGUAGE ASSISTANCE**

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to City of Minot services. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another and/or translation, which means the written transfer of a message from one language into another language.

How the City of Minot staff may identify an LEP person who needs language assistance:

- Post notice of the LEP Plan and the availability of interpretation or translation services free of charge.
- All City staff will be provided with “I Speak” cards to assist in identifying the language interpretation needed if the occasion arises.
- All City staff will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year.
- When the City of Minot sponsors an informational meeting or event, a staff person may greet participants as they arrive. By informally engaging participants in conversation it is possible to gauge each attendee’s ability to speak and understand English. Although translation may not be able to be provided at the event it will help identify the need for future events.

*Language Assistance Measures:*

Although there is a very low percentage of LEP individuals in the City of Minot, that is, persons who speak English “not well” or “not at all”, it will strive to offer the following measures:

1. The City of Minot staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating English.
2. The following resources will be available to accommodate LEP persons:
  - Local interpreters for Spanish language will be provided within a reasonable time period.
  - Language interpretation will be accessed for all other languages through a telephone interpretation service.

## **STAFF TRAINING**

The following training will be provided to all staff:

- Information on the Title VI Policy and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of the “I Speak” cards.
- Documentation of language assistance requests.
- How to handle a potential Title VI/LEP complaint.

All contractors or subcontractors performing work for the City of Minot will be required to follow the Title VI/LEP guidelines.

## **TRANSLATION OF DOCUMENTS**

The City of Minot weighed the cost and benefits of translating documents for potential LEP groups. Considering the expense of translating documents, the likelihood of frequent changes in documents and other relevant factors, at this time it is an unnecessary burden to have any documents translated.

Due to the very small local LEP population, the City of Minot does not have a formal outreach procedure in place, as of 2012. Translation resources have been identified and are limited in this region. However, when and if the need arises for LEP outreach, the City of Minot will consider the following options:

- When staff prepares a document, or schedules a meeting, for which the target audience is expected to include LEP individuals, the same procedures will be used to identify LEP individuals and their need for document translation services as with other requests for interpretation that may arise.

## **MONITORING**

### *Monitoring and Updating the LEP Plan:*

The City of Minot will update the LEP Plan as required. At a minimum, the plan will be reviewed and updated every three years, or when it is clear that higher concentrations of LEP individuals are present in the City of Minot service area. Updates will include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether the City of Minot’s financial resources are sufficient to fund language assistance resources needed.
- Determine whether the City of Minot fully complies with the goals of this LEP Plan.
- Determine whether complaints have been received concerning the agency’s failure to meet the needs of LEP individuals.

## **DISSEMINATION OF THE CITY OF MINOT LEP PLAN**

- Post I Speak cards at the front desks/doors of City offices to aid staff in notifying LEP persons of the LEP Plan and how to access language services.