

Johnson City Transit

137 W. Market St.

Johnson City, TN 37604

Grantee ID #1123

LANGUAGE ASSISTANCE
IMPLEMENTATION PLAN
FOR
LIMITED ENGLISH PROFICIENT
PERSONS

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Executive Order 13166 (August 11, 2000) and
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JCT Title VI Liaison – Bradley Osborne
Telephone: 423-434-6269 / E-mail: bosborne@johnsoncitytransit.org

Johnson City Transit Language Assistance Implementation Plan for Limited English Proficiency Persons

Introduction

The purpose of the *Johnson City Transit Language Assistance Implementation Plan for Limited English Proficiency Persons* (LEP) is to fulfill the requirements of Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency,” issued on August 11, 2000, and Federal Transit Administration LEP policy guidance (70 FR 74087, December 14, 2005). Executive Order 13166 clarifies existing requirements for LEP persons under Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), and FTA policy guidance (70 FR 74087) provides recipients of FTA financial assistance with guidance and instructions necessary to carry out the U.S. Department of Transportation Title VI regulations (49 CFR Part 21).

Goal of Johnson City Transit LEP Plan

It is the goal of Johnson City Transit (JCT) to reduce the language barriers for LEP individuals seeking to utilize JCT’s services, to ensure that they are accessible to these persons. To achieve this goal, JCT will take ongoing, reasonable steps consistent with the fundamental mission of JCT¹, to ensure meaningful access by LEP persons to the public transportation services provided by JCT.

Johnson City Transit System Overview

JCT provides public transportation service in Johnson City, Tennessee. Johnson City, with a population of 63,152², is the urban center of the Johnson City Urbanized Area, located in upper northeast Tennessee. The current Johnson City Urbanized Area population is 111,979.³

Johnson City Transit (JCT) provides both fixed route and demand response services. JCT fixed route service covers the major activity centers areas in Johnson City, including medical facilities, educational institutions, public housing complexes, and retail development centers. JCT demand response service includes: 1) paratransit services within ¾ mile of all JCT fixed routes as well as within the entire city limits

¹ The mission statement of Johnson City Transit is: “Johnson City Transit is committed to providing safe, efficient, effective, reliable public transportation for access within the community.”

² Johnson City population data obtained from 2010 U.S. Census

³ Urbanized Area population data calculated by the JCMPO, using GIS to apply 2010 Census population data to TAZs in the urbanized area.

of Johnson City for ADA certified individuals with disabilities, and 2) Job Access transportation service, which provides job-related trips within the entire city limits of Johnson City as well as to adjacent employment areas.

Chapter 1 – Four Factor Analysis

Factor 1: Number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the grantee.

JCT planning staff examined data from the U.S. Census Bureau's 2005-2009⁴ American Community Survey, Economic Characteristics, Ability to Speak English, and was able to determine that only 2.2% of Johnson City's population have the ability to speak English less than "very well." Of the population which speaks English less than very well, the large majority (75%) speak Spanish as their primary language. Data from the U.S. Census Bureau, American Community Survey, Social Characteristics, Ability to Speak English, for Johnson City, TN. U.S. Census data for 2005-2009 was used, as this is the most current demographic data available.

JCT planning staff also consulted with the Johnson City School System, which provided data listing Limited English Proficiency students at approximately 1% of the total student population. Most the LEP students in the school system speak Spanish as their primary language.

Based on U.S. Census data, Johnson City School System data, and JCT staff interaction with the public utilizing JCT's transit services, JCT planning staff determined that there is currently a small percentage of LEP persons in the JCT service area (approximately 2%), most of whom speak Spanish as their primary language.

Factor 2: The frequency with which LEP individuals come in contact with the program, activity, or service.

JCT planning staff assessed, as accurately as possible, the frequency with which JCT has or should have contact with LEP individuals seeking assistance. This assessment included:

- A review of JCT public meetings (attendees) and public notices within the past year, all of which were publicized and stated that that translators/interpreters were available at meetings, upon request, at no charge to the individual(s) making the request.
- Interviews with JCT drivers and dispatchers by JCT planning staff. Drivers have direct contact with patrons utilizing JCT public transit when

⁴ Most current demographic data available.

they are on the JCT vehicles. JCT dispatchers are located in a cubicle in the transit center lobby, and have direct contact with patrons as they provide operational information to patrons both in person and by telephone.

- A review of requests by LEP individuals to utilize the interpreting and translating telephone service which JCT provides to LEP individuals at no cost, through a contract JCT has with World Wide Interpreters (WWI), an “instantaneous” telephonic conferencing interpretation service. Notices about the WWI free service are posted in visible locations throughout the JCT transit center lobby/public area, and on JCT revenue vehicles. (**Exhibit 1** presents a copy of the WWI free service notice.)
- A review of the number hits on the Spanish translated version of JCT’s website.
- Consultation with local agencies whose clients served include persons with Limited English Proficiency, including the Johnson City School System, the Johnson City Police Department, the East Tennessee State University Language and Culture Resource Center, the ETSU Migrant Education Program, the Johnson City Downtown Clinic (serving the uninsured), the Northeast Tennessee Division of the Tennessee Department of Human Services, and Frontier Health. Consultation included sending a letter and brief questionnaire to these agencies.

Factor 3: The nature and importance of the program, activity, or service provided by JCT to the community.

JCT provides regular public transit service to a small number of LEP individuals. However, JCT personnel having direct contact with LEP transit patrons (JCT drivers and dispatchers) have stated that nearly all (95 to 100%) of the LEP patrons served by JCT are able speak English well enough to communicate with JCT personnel in English in order to ask transit-related questions and comprehend the response given to them. Despite the small percent of people in the JCT service area that does not have the ability to communicate well in English, JCT realizes the importance of public transit to all residents in the community and has therefore taken numerous steps to competently accommodate LEP individuals in the JCT service area. These steps are detailed in Chapter 2, Section 2 of this plan.

Factor 4: The resources available to JCT and costs.

JCT is a small urban transit system, with a correspondingly small budget. Therefore, JCT has carefully explored the most cost-effective means of delivering competent and accurate language services to accommodate LEP individuals in the JCT service area. This included:

- identifying what staff language interpreters are readily available;
- determining what JCT staff training is needed to implement language assistance measures;
- calculating the cost of
 - a contract with a company to provide professional telephonic “instant” conferencing interpretation services in various languages;
 - professional language interpreters;
 - having JCT informational documents (ex: route schedules; JCT website) translated into Spanish, and printed copies available;
 - purchasing booklets and training CDs (*Basic Spanish for Transit Employees*⁵) for JCT employees who have direct contact with LEP individuals using JCT services;
 - providing public notices (including newspaper) in both English and Spanish formats
 - providing training to JCT employees regarding assisting LEP individuals;
- taking an inventory of available local organizations with whom JCT could consult and/or partner for input and outreach efforts.

After analyzing the above four factors, JCT planning staff developed the plan outlined in the following chapter for assisting LEP individuals to utilize JCT services.

Chapter 2 – Providing Notice of Language Assistance to LEP Persons

Section 1: Identifying LEP Persons Who Need Language Assistance

Results of the assessment of the frequency with which JCT has or should have contact with LEP individuals seeking assistance were that during the most recent fiscal year were:

⁵ *Basic Spanish for Transit Employees* is a pocket-size laminated phrase book filled with common expressions in English and Spanish, with words also provided in phonetic spellings. It was developed and is published through a joint effort by the Colorado Mountain College, Roaring Fork Transportation Authority, and Colorado DOT.

- There were no requests for either translators at public meetings or documents in translated version(s).
- There were also no requests to use the WWI telephone translator service. However, JCT will remain a client of WWI and maintain this service for patrons (at no charge to patrons) for potential future use.
- There was a very small percentage of “hits” on the Spanish translated pages of the JCT website compared to the overall “hits” on the JCT website. (2% of total “hits” on the overall JCT website during the past year).
- JCT drivers and dispatchers reported that virtually all individuals who might be considered LEP were able to communicate in English well enough to ask transit-related questions and understand the response. (Drivers/dispatchers observed such things as whether an LEP individual, after asking and receiving information from JCT driver/dispatcher boarded the correct bus to get to his/her desired destination, or was able to correctly pay his/her fare.) U.S. Census data for Johnson City, which lists only 2.2% of the population in Johnson City as speaking English “less than very well,” confirms the information obtained from interviews with JCT drivers and dispatchers, regarding the “working ability” to communicate in English of LEP individuals using JCT transit services.
- The Johnson City School System stated that only 1% of the total students enrolled in the school system for the 2011-12 academic year are LEP students.
- The ETSU Language and Culture Resource Center and Frontier Health agencies reported that while they do not have numerical data on LEP persons their agencies serve as compared to the total area population (or total population served by their agencies), the vast majority of those LEP individuals they do serve speak Spanish as their primary language.

Section 2: Language Assistance Measures

Although JCT’s assessment results indicate that there is not currently a significant need for language assistance measures, JCT has nevertheless taken numerous measures to make language assistance available, in order to ensure any language barriers by individuals using JCT service are substantially reduced. The language assistance measures JCT has taken will be ongoing/updated as applicable.

JCT provides the following services to area LEP individuals, free of charge:

- Pictographs in the JCT Transit Center (which serves as the origin/end of all JCT fixed routes) and on JCT vehicles, to provide essential information.
- JCT drivers and dispatchers carry a copy of *Basic Spanish for Transit Employees* when on duty, and they refer to it as needed.
- Telephonic conferencing interpretation services available at Transit Center (Service is available to Tennessee public transportation systems through Tennessee Department of Transportation contract with World Wide Interpreters (WWI)).
- Translation of JCT website into Spanish by a TNUCP certified Spanish minority Disadvantaged Business Enterprise (present a copy of Home page and Civil Rights page of the JCT website in Spanish version);
- Translation of major JCT documents (including Title VI informational and complaint documents, and fixed route ride guide) into Spanish by a TNUCP certified Spanish minority Disadvantaged Business Enterprise
- “As needed” contracts established with area translators (State certified translators) for oral interpretation service during JCT public meetings or for translation of written JCT program information;
- Training a bilingual (Spanish/English) JCT staff member to provide interpreter services as needed;
- Provision of notices of public hearings/meetings regarding JCT’s proposed transportation plans, projects, or changes, and reduction, denial, or termination of services or benefits, in both English and Spanish, including statement that translator/interpreter will be provided at meetings at no charge, with a seven-day advance request.
- Network with local human service agencies that provide service to LEP individuals, and seek opportunities to provide information about JCT services.

As noted in Section 1, above, per the U.S. Census, only 2.2% of Johnson City's population speaks English less than "very well." Of this group, the largest majority of LEP individuals speak Spanish. Therefore, JCT's efforts in areas such as document translation have been in Spanish to this point. However, JCT does provide telephonic conferencing interpretation services for all languages, and will maintain an ongoing awareness of Census and related data regarding the possible growth of other non-English populations in the Johnson City area.

Section 3: Training Staff

All JCT employees, including management staff, will be provided access to the *Johnson City Transit Language Assistance Implementation Plan for Limited English Proficiency Persons*, and will be educated on procedures and services available and the importance of the plan. This information will also become part of the JCT training/orientation for new employees. Training topics provided to all JCT employees will include:

- Understanding JCT's Title VI and LEP policies and procedures;
- How to access a staff interpreter and/or a staff member to utilize World Wide Interpreters telephone interpreters;
- How to access JCT documents which have been translated into Spanish;
- How to use booklet *Basic Spanish for Transit Employees*; and
- Documentation of language assistance requests.

Additional training will be provided to JCT employees who will be assisting LEP individuals to utilize the telephonic interpretation system.

JCT planning staff will work with "in-person" oral interpreters for JCT public meetings, as well work with certified translators to provide and/or update major documents in Spanish or other languages if need arises.

Section 4: Providing Notice to LEP Persons

JCT will initiate or continue to carry-out the below-listed measures to notify LEP persons of language assistance services available to them free of charge:⁶

- Post notices in English/Spanish⁷ public areas such as the JCT transit center lobby and JCT vehicles, informing LEP individuals of JCT-provided language assistance available which is available to them at no cost;

⁶ There are no non-English-language radio and/or television stations in the Johnson City or upper East Tennessee area.

⁷ See final paragraph of Chapter 2, Section 3, regarding reasons JCT's translation efforts (at this point) are being primarily focused on assisting Spanish-speaking LEP persons.

- Provision of Spanish translation copies of the JCT route guide to LEP persons by JCT dispatchers to those LEP persons who request or it or whose questions to JCT dispatchers and/or JCT drivers indicate it would be helpful to them;
- Provide a link on the JCT website to a Spanish translation of the website, with the clause, in Spanish, “To see a Spanish translation of this page, please click here” (“*Para obtener una traducción de este documento en Español, favor marcar/click en este espacio*”) on each page of the JCT website, routing/linking LEP persons to the Spanish translation of each page;
- Publish public hearing/meeting in both English and Spanish, with both versions of the notices including the following clause:

“Contact Emily Wood (434-6269) at Johnson City Transit by (applicable month and day), to arrange special services (signing; interpreting; other) required during the meeting.” ; and
- Provide Spanish translation copies of the JCT ride guide and Title VI brochure (which contains LEP information) to community agencies identified as those JCT could partner with for outreach to LEP persons.

Chapter 3 – Monitoring and Updating the LEP Plan

This plan will be reviewed, with a reevaluation of whether there have been changes in the Johnson City area LEP population demographics, types of JCT services, or other needs which indicate a need to update/expand JCT’s language assistance services. At a minimum, this review will follow the JCT / JCMPO Title VI Program update schedule.

During the plan review, the following will be assessed:

- Current LEP populations in the JCT service area;
- Frequency of JCT encounters with LEP persons;
- Nature and importance of JCT services to LEP persons;
- Whether sources identified in this plan for JCT language assistance are still available and viable;
- Whether additional language assistance measures are needed;
- Availability of JCT resources (including technological advances and/or other new resources) and the costs entailed;
- Whether existing JCT language assistance measures are meeting the needs of LEP persons in JCT service area, including input from applicable community agencies/groups; and

- Whether JCT employees continue to understand JCT's LEP plan and their part(s) in implementing it.

Chapter 4 – Dissemination of the JCT LEP Plan

- The *Johnson City Transit Language Assistance Implementation Plan for Limited English Proficiency Persons* will be posted on the Johnson City Transit website at <http://www.johnsoncitytransit.org/dbe.htm>.
 - For persons without internet service, the Johnson City Public Library, located on the JCT fixed routes and in the JCT paratransit service area, offers free Internet access.
- The JCT LEP Plan is available upon request in hard copy at the JCT Transit Center.
 - The plan will be mailed upon request.
- A Spanish translation of the plan will be available upon request.
- Information about the JCT LEP Plan will be provided in the JCT Title VI brochure, which is widely distributed to local human service agencies, to neighborhood organizations, and at JCT public meetings/hearings.

An Interpreter Will Be Provided At No Cost To You

	Arabic اللغة العربية وسنادي المترجم حالاً.	Korean 한국말 당신이 쓰는 말을 지적하세요.	
	Armenian Հայերէն Ինքան Կը Խօսիք՝	Laotian พາສາລາວ ຊື່ບອກພາສາທີ່ເຈົ້າເວົ້າໄດ້	
	Cambodian ភាសាខ្មែរ សូមចង្អុលភាសាអ្នក	Mandarin 國語 請指認您的語言.	
	Cantonese 廣東話 唔該點出您講嘅語言.	Polish Polski Proszę wskazać na swój język ojczysty.	
	French Français Montrez-nous quelle langue vous parlez.	Portuguese Português Aponte seu idioma.	
	German Deutsch Zeigen Sie auf Ihre Sprache.	Russian Русский Язык Укажите, на каком языке Вы говорите	
	Hindi हिन्दी अपनी भाषा इशारे से दिखाइये।	Spanish Español Señale su idioma.	
	Hmong Hmoob Thov taw tes rau koj yam lus.	Tagalog Tagalog Paki turo mo nga ang iyong wika.	
	Italian Italiano Faccia vedere qual è la sua lingua.	Thai ภาษาไทย ท่านชี้ให้ทางพูดเลยว่าภาษาไทยคือภาษาที่ท่านพูด	
	Japanese 日本語 あなたの話す言葉を指さしてください	Vietnamese Tiếng Việt Chỉ rõ tiếng bạn nói.	

POINT TO YOUR LANGUAGE

