

Johnson City Transit
137 W. Market St.
Johnson City, TN 37604
Grantee ID #1123

**LANGUAGE ASSISTANCE
IMPLEMENTATION PLAN
FOR
LIMITED ENGLISH PROFICIENT
PERSONS**

UPDATED Nov. 2017



**Prepared in accordance with
Executive Order 13166 (August 11, 2000) and
USDOT LEP Guidelines 70 FR 74087**

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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 66,677², is the urban center of the Johnson City Urbanized Area, located in upper northeast Tennessee. The current Johnson City Urbanized Area population is 120,415.³

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. (**Exhibit 1** provides a current JCT fixed-route map.) JCT demand response service includes: 1) paratransit services within $\frac{3}{4}$ mile of all JCT fixed routes as well as within the entire city limits of Johnson City for ADA certified individuals with disabilities, and 2) Job Access

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 American Fact Finder 2016 Estimate.

³ Urbanized Area population data calculated using 2010 Census population data.

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 2011-2015 American Fact Finder, Ability to Speak English, and was able to determine that only 1.4% 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 (69.9%) speak Spanish as their primary language. **Exhibit 2** presents data from the U.S. Census Bureau, American Fact Finder, and Ability to Speak English, for Johnson City, TN. U.S. Census data for 2011-2015 was used, as this is the most current demographic data available for this characteristic.

JCT planning staff also consulted with the Johnson City School System. Data provided by JC Schools states that 4.4% of its student population is LEP. Johnson City Police Department has estimated a Limited English Proficiency level of the city's population to be approximately 1%. The vast majority of the LEP students in the school system speak Spanish as their primary language.

Based on U.S. Census data, Johnson City School System data, data provided by JC police 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 individuals in the JCT service area (approximately 2%) who speak English less than very well. The vast majority of the LEP individuals 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 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.

- AECOM conducted a comprehensive operational analysis for the services provided by JCT. More than 1,000 individuals were interviewed, and of these results 908 were used due to completeness. This study showed that 6% of the population of the riders spoke a language other than English at home. This study did not describe the level of English proficiency, nor did it state the most common language spoken at home.
- 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 Avaza Language Services, an “instantaneous” telephonic conferencing interpretation service. Notices about the Avaza Language Services free service are posted in visible locations throughout the JCT transit center lobby/public area, and on JCT revenue vehicles. (**Exhibit 3** presents a copy of the Avaza Language Services free service notice.) Since the last update, Avaza language services have been enlisted 3 times.
- JCT has implemented a method on its website which will track the number of clicks on the language translation feature.
- Consultation with local agencies whose clients served include persons with Limited English Proficiency, including the Johnson City School System, the East Tennessee State University Language and Culture Resource Center, and the Northeast Tennessee Division of the Tennessee Department of Human Services, Johnson City Police Department.

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*⁴) for JCT employees who have direct contact with LEP individuals using JCT services; JCT most recently purchased 30 more books for it staff in August 2017.
 - providing public notices (including newspaper) in both English and Spanish formats
 - providing training to JCT employees regarding assisting LEP individuals; JCT staff, most administrative as well as dispatcher and drivers have received at least one hour of LEP training since the last Title VI update.
- 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

⁴ *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.

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, nor since 2014 submission of the LEP:

- There were no requests for either translators at public meetings or documents in translated version(s).
- JCT has 3 request for Avaza language services since its last update in 2014, with two occurring in the last fiscal year. JCT will remain a client of Avaza Language Services, and will maintain this service for patrons (at no charge to patrons) for potential future use.
- 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 2.0% 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 Police department stated that the approximate percentage of LEP individuals would be around 1%.
- The Johnson City School System stated that 4.4% of the total students enrolled in the school system for the 2016-2017 academic year are LEP students.
- The ETSU Language and Culture Resource Center reported that while they do not have numerical data on LEP persons they serve, compared to the total area population, the percentage of LEP persons would be small.

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 assist area LEP individuals, free of charge:

- 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 Avaza Language Services. As noted previously, on page 3 herein, copy of a notice posted in the Transit Center about using free Avaza Language Services is shown in Exhibit 3);
- Provision of a web translation service for JCT's website, which will translate the website into various languages. (Exhibit 4 shows this service availability on the JCT website, which is available on all pages of the JCT website);
- 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; currently JCT has one employee fully fluent in Spanish and English, as such, it has not required to train an employee to speak Spanish. An employee's ability to speak multiple languages is considered a very positive attribute during the hiring phase.
- 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. (Exhibit 5 provides a copy of a public hearing notice published in both English and Spanish in the local daily newspaper, *Johnson City Press*.);
- 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, less than 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, are provided access to the *Johnson City Transit Language Assistance Implementation Plan for Limited English Proficiency Persons*, and are educated on procedures and services available and the importance of the plan. This information has become part of the JCT training/orientation for new employees. Training topics provided to all JCT employees include:

- Understanding JCT's Title VI and LEP policies and procedures;
- How to access a staff interpreter and/or a staff member to utilize Avaza Language Services telephone interpreters;
- How to access JCT documents which have been translated into Spanish;
- How to use booklet *Basic Spanish for Transit Employees and In-house Created Speaking Spanish to School age children Document*, and
- Documentation of language assistance requests.
- Since the previous update, JCT has had three employee LEP informational and how to implement meetings.

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 when need arises. Tri-Cities Bilingual Services Company is located very near JCT's transit facility, and is capable of providing this service to JCT.

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:⁵

⁵ There are no non-English-language radio and/or television stations in the Johnson City or upper East Tennessee area.

- Post notices in English/Spanish 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;
- 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 translate any given page of the JCT website into the language needed by the LEP individual
- 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 when asked for.

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.

Exhibit 1.

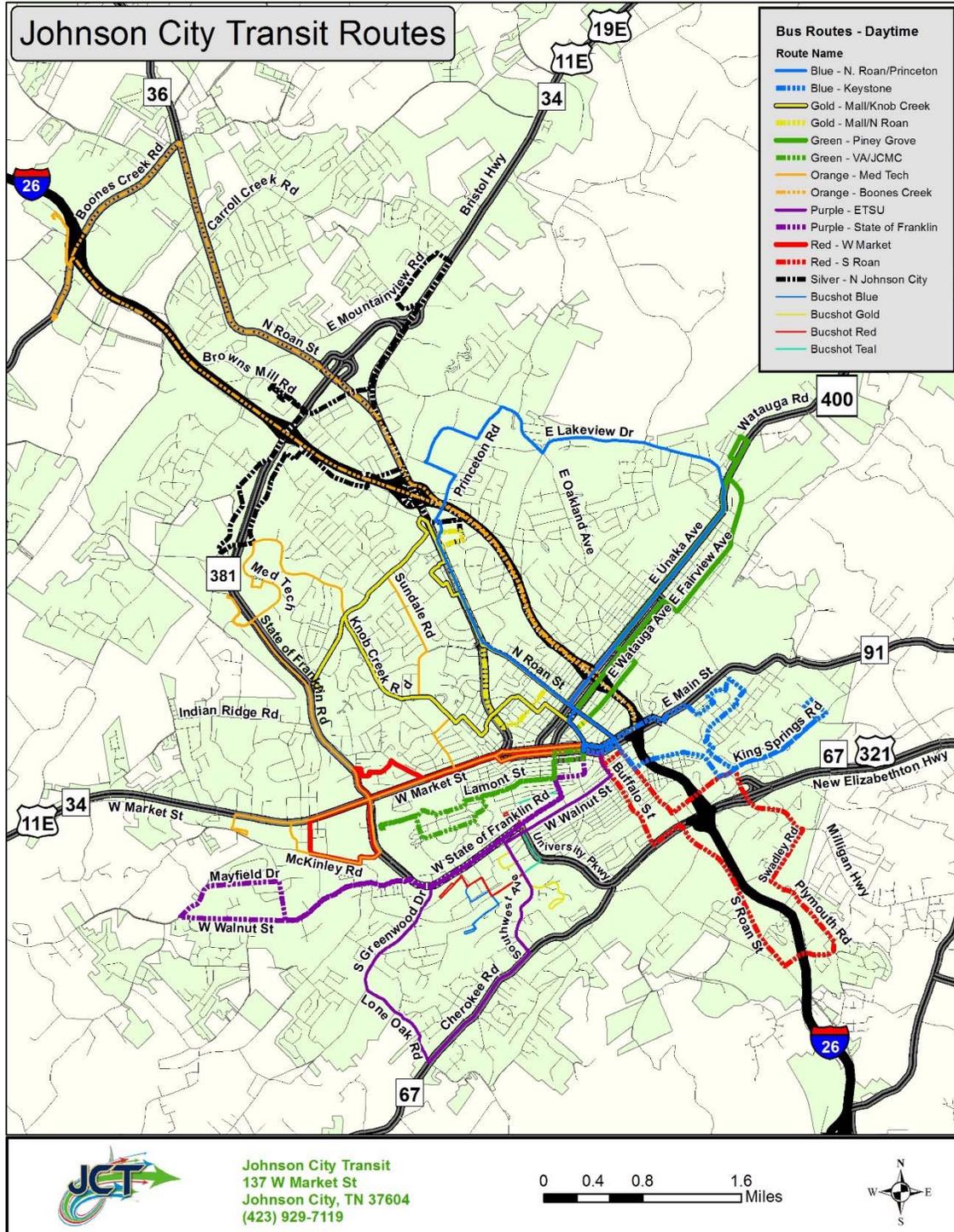


Exhibit 2.

Tell us what you think. Provide feedback to help make American Community Survey data more useful for you.

Although the American Community Survey (ACS) produces population, demographic, and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

Years of this table are available for the following years

- 2015
- 2014
- 2013
- 2012
- 2011
- 2010
- 2009

Subject	Total		Percent		Johnson City, Tennessee									
	Estimate	Margin of Error	Estimate	Margin of Error	Speak English only or speak English "very well"		Percent speak English only or speak English "very well"		Speak English less than "very well"		Percent speak English less than "very well"			
					Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error		
Population 5 years and over	61,371	+/-446	(X)	(X)	60,229	+/-574	68.9%	+/-2.4	642	+/-227	1.4%	+/-2.4		
Speak only English	30,068	+/-754	49.0%	+/-0.9	(X)	(X)	(X)	(X)	(X)	(X)	(X)	(X)		
Speak a language other than English	3,305	+/-560	5.4%	+/-0.9	2,463	+/-500	74.9%	+/-6.2	842	+/-227	25.5%	+/-5.2		
SPEAK A LANGUAGE OTHER THAN ENGLISH														
Spanish	1,427	+/-439	2.3%	+/-0.7	989	+/-369	69.9%	+/-9.3	439	+/-157	30.1%	+/-9.3		
5 to 17 years old	254	+/-171	0.4%	+/-0.3	201	+/-152	79.1%	+/-1.9	53	+/-54	20.9%	+/-1.9		
18 to 64 years old	1,077	+/-314	1.8%	+/-0.5	757	+/-280	70.9%	+/-1.6	320	+/-137	29.7%	+/-1.6		
65 years old and over	98	+/-51	0.2%	+/-0.1	40	+/-32	41.7%	+/-2.9	58	+/-38	59.0%	+/-2.9		
Other Indo-European languages	739	+/-269	1.2%	+/-0.4	524	+/-209	72.4%	+/-1.5	214	+/-122	27.6%	+/-1.5		
5 to 17 years old	120	+/-106	0.3%	+/-0.2	116	+/-106	96.7%	+/-7.3	4	+/-7	3.3%	+/-7.3		
18 to 64 years old	481	+/-187	0.8%	+/-0.3	328	+/-157	68.0%	+/-2.1	153	+/-132	33.2%	+/-2.1		
65 years old and over	127	+/-69	0.2%	+/-0.1	90	+/-40	70.9%	+/-2.9	37	+/-38	29.1%	+/-2.9		
Asian and Pacific Island languages	838	+/-199	1.4%	+/-0.3	699	+/-194	82.4%	+/-9.4	139	+/-60	17.6%	+/-9.4		
5 to 17 years old	72	+/-66	0.1%	+/-0.1	72	+/-66	100.0%	+/-34.4	0	+/-8	0.0%	+/-34.4		
18 to 64 years old	696	+/-163	1.1%	+/-0.3	522	+/-175	80.7%	+/-1.6	134	+/-76	19.3%	+/-1.6		
65 years old and over	68	+/-47	0.1%	+/-0.1	55	+/-33	80.9%	+/-28.4	13	+/-22	19.1%	+/-28.4		
Other languages	304	+/-189	0.5%	+/-0.3	242	+/-141	79.6%	+/-7.6	62	+/-74	20.4%	+/-7.6		
5 to 17 years old	29	+/-32	0.0%	+/-0.1	5	+/-8	19.2%	+/-4.9	21	+/-31	80.8%	+/-4.9		
18 to 64 years old	299	+/-154	0.4%	+/-0.3	218	+/-124	84.2%	+/-12.5	41	+/-46	15.8%	+/-12.5		
65 years old and over	19	+/-29	0.0%	+/-0.1	19	+/-29	100.0%	+/-60.0	0	+/-28	0.0%	+/-60.0		
CITIZENS 18 YEARS AND OVER														
All citizens 18 years old and over	50,716	+/-732	(X)	(X)	50,912	+/-751	99.2%	+/-0.3	404	+/-159	0.8%	+/-0.3		
Speak only English	49,959	+/-736	98.5%	+/-0.7	(X)	(X)	(X)	(X)	(X)	(X)	(X)	(X)		
Speak a language other than English	1,783	+/-341	3.5%	+/-0.7	1,399	+/-314	77.1%	+/-8.3	404	+/-159	22.9%	+/-8.3		
Spanish	645	+/-200	1.3%	+/-0.4	459	+/-179	71.2%	+/-1.9	186	+/-100	28.8%	+/-1.9		
Other languages	1,118	+/-287	2.2%	+/-0.6	900	+/-259	80.5%	+/-10.7	218	+/-133	19.5%	+/-10.7		

Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates

Exhibit 2.

Exhibit 3.

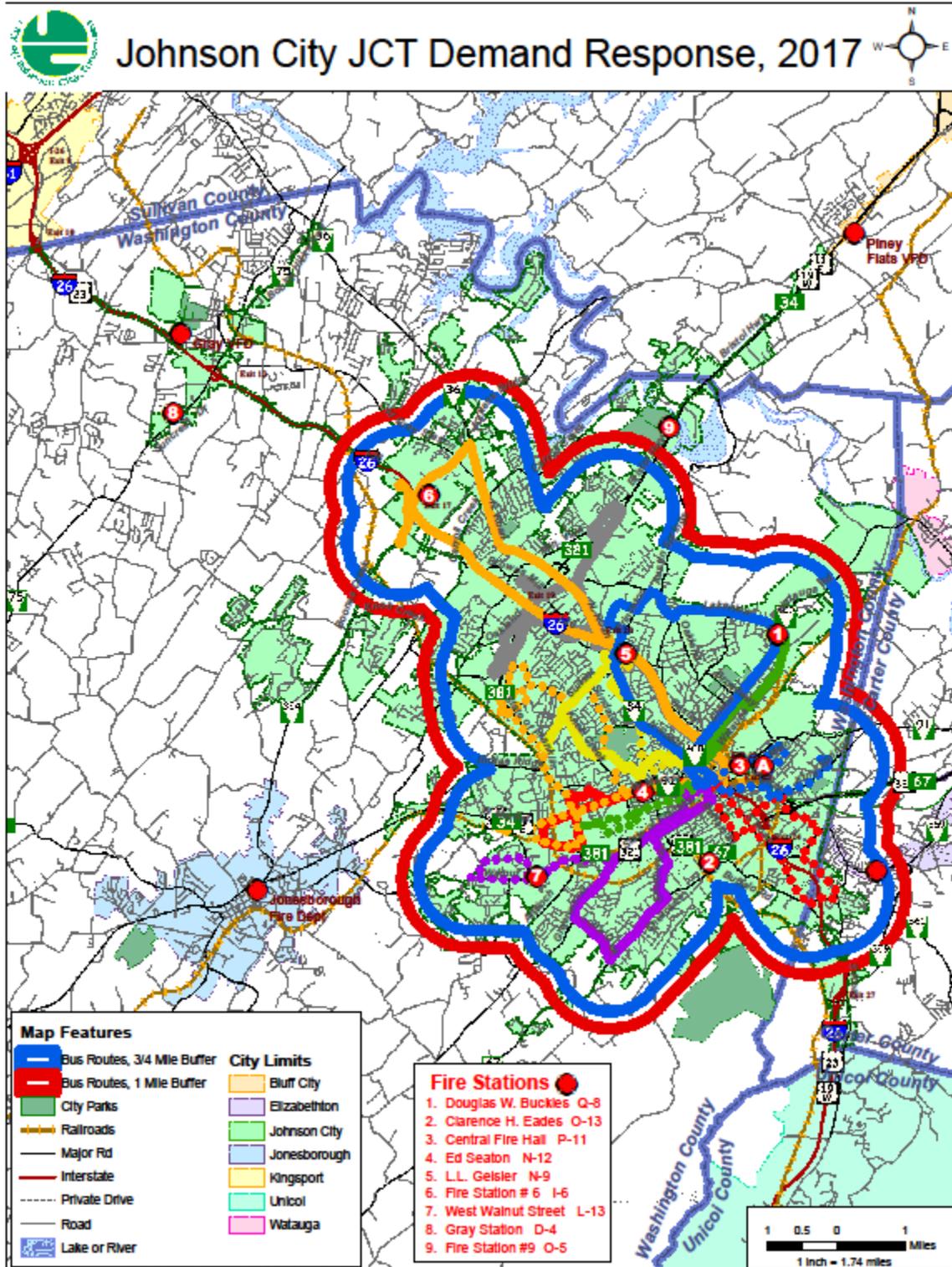


Exhibit 4.

The screenshot shows the Johnson City Transit website. At the top left is the JCT logo. To the right is a search bar labeled "Google Custom Search". Below the search bar is a navigation menu with links: HOME, GENERAL INFO, SERVICES, DEMAND RESPONSE, NEWS, DOCUMENTS, and CONTACT. The main heading is "Johnson City Transit". Below this is a "Welcome to Johnson City Transit" section with a photo of a bus. To the right is a "Join JCT Text Alerts" form with fields for Name and Cell Number, a checkbox for "I agree to Privacy Policy & Terms and Conditions", and a "Submit" button. A language selection dropdown menu is open, showing options from Afrikaans to Czech. Below the form are four service tiles: "Trip Planner" (Plan your next trip using Google Trip Planner), "General Info" (View routes, schedules, and operational hours), "Bucshot" (Get the latest info on Bucshot service), and "Contact Us" (CALL US, TWITTER, EMAIL, DIRECTIONS, ADDRESS). At the bottom is a dark footer with four columns: "Services" (Fixed Route, Job Access, Paratransit, Bucshot), "General Info." (Hours, Fares, Routes/Schedules, ADA/Civil Rights), "Trip Planning" (Trip Planner, Route/Stop Texting, JCT MyRide, Route Maps), and "Information" (Calendar, News, Documents, Sign up for Text Alerts). The footer also contains copyright information: "© Copyright 2017 Johnson City Transit | 137 West Market Street Johnson City, TN 37604".