Revised 11-17-15

Greensboro Transit Authority

Language Assistance Implementation Plan

November 2015

City of Greensboro Department of Transportation
Public Transportation Division
PO Box 3136
Greensboro, NC 27402-3136
(336) 373-2634

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I. INTRODUCTION

The Greensboro Transit Authority (GTA) serves as the primary public transportation provider for the city of Greensboro, North Carolina. GTA operates 16 fixed routes and 1 connector route under the GTA moniker while an additional 5 are offered under the service name of Higher Education Area Transit (HEAT). In addition, GTA provides Specialized Community Area Transit paratransit services (SCAT) open to residents with qualified disabilities.

GTA averages about 4.3 million passenger trips per year, serving the many populations within the city limits with the sole out-of-city destination of Guilford Technical Community College. Serve hours are 5:15 a.m to 11:30 p.m. Monday – Friday, 6:00 a.m. to 10:00 p.m. Saturdays and 6:00 a.m. to 6:00 p.m. on Sundays. Most routes Monday – Friday operate on a 30-minute frequency while Saturdays and Sundays are an hour frequency with only 7 routes on Sunday. Together, GTA and HEAT drive over 2.1 million revenue miles per year. SCAT services are offered during the same hours as required by federal law for almost 1000 regular users, averaging over 1.4 million passenger miles annually.

Together, the three services provide access to many demographic groups including persons of low income, foreign-born and Low English Proficiency. Routes are continually evaluated to ensure destinations for these groups are accessible including such locations as Guilford County Social Services, Guilford County Health Department, Guilford Technical Community College, Moses Cone Health System and a number of public schools, medical facilities and shopping areas. Transit planners continually reevaluate system routes to ensure that areas of higher population density are served while input is readily accepted through our translatable websites, customer comment cards and during various committee, panel and board meetings.

II. PURPOSE

The purpose of this policy is to ensure compliance with Title VI of the Civil Rights Act of 1964 and Section 2 of Executive Order 13166 with respect to persons with limited English proficiency (LEP). Title VI of the Civil Rights Act of 1964 prohibits discrimination based on the grounds of race, color or national origin by any entity receiving federal financial assistance. Administrative methods or procedures, which have the effect of subjecting individuals to discrimination or defeating the objectives of these regulations, are prohibited.

This Plan details the Greensboro Transit Authority (GTA) initiatives and plans to improve access to its federally conducted programs and activities by eligible individuals who are limited English proficient (LEP).

28 C.F.R., Part 39, Editorial Note, *Section 29.102 Application*. Neither Executive Order 13166 nor this Plan creates any new right(s), including the right to seek administrative or judicial enforcement, on the part of any person, including a person with limited English proficiency.

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III. Scope of Policy

These requirements apply to the Greensboro Transit Authority including subcontractors, vendors, and subrecipients.

GTA will ensure that LEP individuals have meaningful access to benefits and services provided through contractors or service providers receiving federal funding from GTA.

IV. Definitions

A. Limited English Proficient (LEP) individual – Any prospective, potential, or actual recipient of services from Greensboro Transit Authority who cannot speak, read, write or understand the English language at a level that permits them to interact effectively with transit system staff.

B. Vital Documents – These forms include, but are not limited to, applications, consent forms, letters containing important information regarding participation in a program; notices pertaining to the reduction, denial, or termination of services, the right to appeal such actions, or that require a response from notices advising LEP persons of the availability of free language assistance, and other outreach materials.

C. Title VI Compliance Officer – The person responsible for compliance with Title VI policies.

D. Substantial number of LEP – 5% or 4,500 people, whichever is smaller, are prospective, potential or actual recipients of service and speak a primary language other than English and have limited English proficiency or who cannot read, write or understand the English language at a level that permits them to interact effectively with transit system staff.

V. Demography

The Greensboro Transit Authority has developed a demographic profile of the population served or likely to be served. The following information is based on 2010 Census Data:

The City of Greensboro had a population of 269,666 individuals. The race and ethnic breakout is as follows:

Population by Race

White	130,396	48%
African American	109,586	41%

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American Indian/Alaskan Native	1,385	.51%
Asian	10,772	4%
Native Hawaiian/Other Pacific Islander	157	.05%
Identified by two or more categories	7,080	2.63%
Other	10,290	3.81%

Population By Ethnicity

Hispanic/Latino	20,336	7.54%
Non Hispanic/Non-Latino	249,330	92.46%

The 2009-2013 American Community Survey estimates a total population of 273,419 persons. It offers an additional breakdown of race and ethnic classifications:

White	134,914	49.4%
African American	111,637	40.9%
Asian	11,428	4.2%
Asian Indian	1,386	.5%
Chinese	917	.3%
Filipino	426	.2%
Japanese	191	.1%
Korean	929	.3%
Vietnamese	4,797	1.8%
Other Asian	2,782	1%
Native Hawaiian/Other Pacific Islander	232	.1%
Some other race	7,516	2.8%
Hispanic or Latino	20,387	7.5%
Mexican	12,498	4.6%
Puerto Rican	1,681	.6%
Cuban	493	.2%
Other Hispanic or Latino	5,715	2.1%

10.7% of the population of Greensboro is foreign born with 91.3% of those entering the City before 2010 and 8.7% after 2010.

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13.7% of the population 5 years of age or older in Greensboro speaks a language other than English at home and of that 46.3% speak English less than "very well." The following information is based on the 2009-2013 American Community Survey:

Spanish	6.5%
Speak English less than "very well"	3.2%
Indo-European languages	2.2%
Speak English less than "very well"	.7%
Asian & Pacific Island languages	3.2%
Speak English less than "very well"	1.8%
Other Languages	1.8%
Speak English less than "very well"	.7%

Data retrieved from Guilford County Schools for the Greensboro area reflects the highest concentration of LEP households within the school system are ranked in the following order:

- Spanish
- Vietnamese
- Arabic
- Urdu (Pakistan)
- Karen (Myanmar or Burma)
- French

Also, based on data from the City of Greensboro Public Affairs Department, the largest groups of LEP persons represented within the city is Spanish and Montegnard, a dialect of Vietnamese.

VI. Frequency of Contact

Over the past few years transit system staff has had intermittent contact with LEP persons who speak either Spanish or other non-English languages. However, the transit system has developed additional plans to reach the individuals who are Vietnamese, Hispanic or Latino and live within the Greensboro City Limits. This will increase the frequency of contact thereby increasing the transit system's need to ensure appropriate measures are taken to communicate with these individuals.

VII. Importance

Public transportation has been considered the "to" in Welfare to Work, Access to Healthcare, and several other programs and/or services that often are utilized by the low-income, minorities, and LEP persons. Without access to public transportation many of these individuals would not be able to take advantage of other services that could potentially be life changing or life sustaining.

While our buses are open to persons within these and other groups, we recognize that the limited proficiency with English can create a real barrier for current and potential riders. GTA continues to conduct outreach activities. We have also partnered with GTCC and the New Arrivals Institute to increase availability of transit services for the daily ESL classes through the use of shuttle buses supplementing regular transit service departures.

Greensboro Transit Authority has applications for several of its programs that could be used by LEP persons to maintain quality of life. The Specialized Community Area Transportation (SCAT) service provides door to door transportation for the elderly and disabled, and the GTA Reduced Fare program provides reduced fares for the elderly, disabled, and Medicare and Medicaid card holders.

Basic transit information such as rules, schedules, and "how to" information would greatly impact access to individuals who do not qualify for the special programs, but depend on public transportation as their means to access education, employment, healthcare, social services, and shopping.

It has become increasingly important for nearly all transit information to be available in a format that is accessible for LEP persons to prevent delays or denial of access to services. Due to the varying dialects of the top languages identified as well as cost considerations, the following vital documents are made available on an as-needed basis through a local translation service:

- applications
- consent forms
- reduction, denial, or termination of service notices
- appeal notices

The availability of these resources will be publicized as outlined in section IX.

VIII. Resources

Language Access Coordination

The Title VI Compliance Officer is the individual assigned to coordinate and ensure meaning access to services for LEP individuals.

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Points of Contact

- Office staff answering transit information lines
- Customer Service Agents at the J. Douglas Galyon Depot
- Bus Operators
- Transit Road Supervisors

Staff

Currently there are a limited number of staff persons who are bilingual. In the case there is a need to communicate with persons who do not speak English, staff has access to local resources for language translation services

Outside the City of Greensboro, staff works with the appropriate agencies to assist with translation services.

Greensboro Transit Authority also uses its Internet websites to communicate with LEP persons. Each site contains a translation tool administered by Google, Inc. to translate the site text into 42 languages.

Native born LEP individuals will be provided whatever assistance they require to access the services. These methods include but are not limited to reading instructions and applications to the individual, filling in the information they provide orally on necessary applications, and directing/assisting to the correct bus or van.

IX. Providing Notice to LEP Individuals

The transit system will take appropriate steps to inform all applicants, recipients, community organizations, and other interested persons, including those whose primary language is other than English, of the provisions of this policy. Such notification will also identify the name, office telephone number, and office address of the Title VI compliance officer.

TITLE VI COMPLIANCE OFFICER
Candyce Brown, Transit Planner
Greensboro Transit Authority
223 W. Meadowview Road
Greensboro, NC 27406
(336) 373-2182
(336) 373-2809 (fax)
candyce.brown@greensboro-nc.gov

A. The transit system will post and maintain signs in regularly encountered languages other than English in reception/waiting areas that will inform applicants and recipients of service that interpretive services are available by request.

   Areas where signs will be posted:
   - Lobby of the transit system administrative offices
   - At J. Douglas Galyon Depot Customer Service Office
   - At J. Douglas Galyon Bus Slip Area
   - On all transit buses

B. The transit system will include statements of the right of free language assistance by request in Spanish and other regularly encountered languages in all outreach material that is routinely disseminated to the public (including electronic text).

X. Provision of Services to LEP Applicants/Recipients of Services

A. Assessing Linguistic Needs of Potential Applicants and Recipients

   1. The transit system will assess the language needs of the population to be served, by identifying:

      a. The language needs of each LEP applicant/recipient
      b. The points of contact where language assistance is needed; and
      c. The resources needed to provide effective language assistance, including location, availability and arrangements necessary for timely use.

   2. Determining the Language Needs of the Population to be Served

      The transit system is responsible for assessing the needs of the population to be served. Such assessment will include, but not be limited to the following:

      a. Determining the non-English languages GTA is likely to encounter.
      b. An estimate of the number of people in the community for whom English is not the primary language used for communication will be completed and updated annually. To identify the language and number of LEP individuals the transit system will review:

         i. Census data
         ii. Community agencies' data
         iii. School system data
         iv. Reports from federal, state, and local governments

v. Interviews with staff to determine frequency of contact with LEP individuals and what language was encountered

c. The points of contact in the transit system where language assistance is likely to be needed will be identified.

3. Determining the Language Needs of Each Applicant/Recipient

The transit system will determine the language needs of each applicant/recipient. Such assessment will include, but not be limited to the following:

a. At the first contact, each applicant/recipient will be assessed to determine the individual's primary language by using the following methods:

i. Using applicant/recipient's statement "Hablo español", "No hablo ingles" or a similar phrase indicating they do not speak English.
ii. Applicant/recipient's request for an interpreter
iii. Multi-language identification booklet.

b. If the LEP person does not speak or read any of these languages, the transit system will use a telephone interpreting service to identify the person's primary language.
c. Staff will not rely solely on their own assessment of the person's English proficiency in determining the need for an interpreter. If an individual requests an interpreter, an interpreter will be provided free of charge. The transit system will use the individual's declaration to establish the person's primary language.
d. When staff place or receive a telephone call and cannot determine what language the other person on the line is speaking, a telephone interpreting service will be utilized in making the determination.

B. Provision of Bilingual/Interpretive Services

1. The transit system will ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English speaking population. The transit system will provide bilingual/interpretive services promptly and without undue delay.

2. The transit system will provide language assistance to LEP individuals in an office setting via person to person or telephone interactions using a telephone interpreter service. GTA will provide language assistance to LEP individuals at public meetings by contracting with an interpreter or using a volunteer interpreter. The transit system will not require the individual to pay for bilingual/interpretive services.

3. Interpreter Standards

a. Those providing bilingual/interpretive services will meet the linguistic and cultural competency standards set forth below. The transit system will ensure that interpreters have been screened to ensure that the following standards are met before being used for interpreter services:

   i. Can fluently and effectively communicate in both English and the primary language of the LEP individual
   ii. Can accurately and impartially interpret to and from such languages and English
   iii. Has a basic knowledge of specialized terms and concepts used frequently in the provision of the system's services.
   iv. Demonstrates cultural competency
   v. Understands the obligation to maintain confidentiality when appropriate
   vi. Understands the roles of interpreters and the ethics associated with being an interpreter.

b. The transit system will ensure the competency of interpreters using the following methods:

   i. Contracted interpreters
      1. Present resume or similar document showing years of experience, formal education in translation and interpretation, and accreditation from professionally recognized organizations.
      2. Present proof of continued education and any certifications.
      3. Have understanding of transportation, specifically transit, terminology.
   ii. Volunteer interpreters
      1. Native speakers
      2. Non-native speakers
         a. Present resume or similar document showing years of experience, formal education in translation and interpretation, and accreditation from professionally recognized organizations.
         b. Present proof of continued education and any certifications.
         c. Have understanding of transportation, specifically transit, terminology.
         d. Be approved through other agencies whose services may impact the LEP population.

C. Provision of Written Translations

1. Upon request, the transit system will provide written materials in languages other than English where a substantial number or percentage of the population eligible or likely to be served by transit system programs/services needs services or information in a language other than English to communicate effectively.

2. Translation of Vital Documents

   a. Upon request, the transit system will ensure that vital documents for locally designed programs are translated into languages identified in the local language assessment.

   b. The transit system will keep a record of all vital documents translated, and will submit this information to local, state, and federal agencies upon request. The transit system will maintain a manual with a copy of all such documents. A volunteer or contracted interpreter/translator will be used to translate and review the accuracy of all translated documents.

3. If the primary language of an LEP individual is a language that does not meet the threshold for translation as defined in the paragraph IIID, the LEP individual will be informed in their own language of the right to oral translation of written notices. The notification will include, in the primary language of the individual, the following: IMPORTANT: IF YOU NEED HELP IN READING THIS, ASK THE TRANSIT SYSTEM FOR AN INTERPRETER TO HELP. AN INTERPRETER IS AVAILABLE FREE OF CHARGE.

D. Staff Development and Training

1. Initially the transit system will provide staff training for all employees to notify them of the policy and their responsibilities, at new employee orientation and periodically as needed for refresher training or when updates occur in the plan. The training will include, but not be limited to:

   a. Language assistance policies and procedures, resources available to support such procedures, methods of effective use of interpreters, and familiarization with the discrimination complaint process.

   b. Cultural awareness information, including specific cultural characteristics of the group served by the agency to provide a better understanding of, and sensitivity to, the various cultural groups to ensure equal delivery of services.

2. The transit system will provide or ensure training is provided for bilingual staff and interpreters employed or utilized by the transit system. This includes the ethics of interpreting, including confidentiality; methods of interpreting; orientation to the organization; specialized terminology used by the transit system; and cultural competency.

3. The transit system will collect and maintain the following information about training provided to staff and volunteers: the date(s) of such training, the content of such training, and the names of each attendee at the training.

4. The transit system will ensure that applicable subrecipients and contractors are trained in the requirements of this policy by including applicable language in grant agreements, contracts, MOUs, or other documentation.

XI. Monitoring

The transit system will complete an annual review of the LEP population and language groups to determine if any new documents, programs, services or activities need to be made accessible for LEP individuals. The transit system will consider at a minimum the following:

1. Current LEP populations in the service area
2. Frequency of encounters with LEP language groups
3. Nature and importance of activities to LEP persons
4. Availability of resources, including technological advances and sources of additional resources, and the costs imposed.
5. Whether existing assistance is meeting the needs of LEP persons
6. Whether staff knows and understands the LEP plan and how to implement it.
7. Whether identified sources for assistance are still available and viable.

XII. Complaints of Discriminatory Treatment

A. Complaints

1. The transit system will provide assistance to LEP individuals who do not speak or write in English if they indicate that they would like to file a complaint. A complaint must be filed in writing within 180 days of the alleged violation, contain the name and address of the person filing it or his/her designee and briefly describe the alleged violation of this policy.

2. The transit system will maintain records of any complaints filed, the date of filing, actions taken and resolution.

3. The transit system will notify the appropriate agency(ies) of complaints filed, the date of filing, actions taken and resolution.

B. Investigation

1. The Title VI compliance officer will conduct an investigation of the allegations of the complaint. The investigation will afford all interested persons and their representatives, if any, an opportunity to submit evidence relevant to the complaint.

2. The investigation will not exceed 30 days, absent a 15-day extension for extenuating circumstances.

C. Resolution of Matters

1. If the investigation indicates a failure to comply with the Act, the Title VI compliance officer or his/her designee will inform the violator and the matter will be resolved by one of the following means within 45 days.

   a. Employee

      i. Retraining on the LEP Policy.
      ii. If necessary, appropriate disciplinary action will be taken per the City of Greenboro's Personnel Resolution.

   b. Volunteer, Contractor or Subrecipient

      i. Volunteer interpreter
         1. Written notice notifying volunteer of violation
         2. Retraining on the LEP Policy
         3. Future violations could result in discontinued use of volunteer

      ii. Contractor
         1. Written notice notifying contractor of non-compliance
         2. Retraining on the LEP Policy
         3. Future violations could result in termination of contract

      iii. Subrecipient
         1. Written notice notifying subrecipient of non-compliance
         2. Retraining on the LEP Policy
         3. Future violations could result in termination of federal funds

2. If the matter cannot be resolved by informal means, then the individual will be informed of his or her right to appeal further to the Greensboro Transit Authority Board. This notice will be provided in the primary language of the LEP individual.

3. If not resolved by the GTA Board, then the complaint will be forwarded to:

   Federal Transit Administration Region IV Office
   230 Peachtree, NW
   Suite 800
   Atlanta, GA 30303

Discrimination Complaint Form

Last Name:	First Name:	☐ Male ☐ Female

Mailing Address:	City:	State:	Zip:

Home Telephone: ( )	Work Telephone: ( )	E-mail Address:

Identify the Category of Discrimination:

☐ RACE	☐ COLOR	☐ NATIONAL ORIGIN	☐ AGE
☐ RELIGION	☐ DISABILITY	☐ SEX/GENDER	☐ INCOME STATUS

Identify the Race of the Complainant

☐ Black	☐ White	☐ Hispanic	☐ Asian American
☐ American Indian	☐ Alaskan Native	☐ Pacific Islander	☐ Other _____

Date and place of alleged discriminatory action(s). Please include earliest date of discrimination and most recent date of discrimination.

How were you discriminated against? Describe the nature of the action, decision, or conditions of the alleged discrimination. Explain as clearly as possible what happened and why you believe your protected status (basis) was a factor in the discrimination. Include how other persons were treated differently from you. (Attach additional page(s), if necessary)

The law prohibits intimidation or retaliation against anyone because he/she has either taken action, or participated in action to secure rights protected by these laws. If you feel that you have been retaliated against, separate from the discrimination alleged above, please explain the circumstances below. Explain what action you took which you believe was the cause for the alleged retaliation.

Names of individuals responsible for the discriminatory action(s):

Names of persons (witnesses, fellow employees, supervisors, or others) whom we may contact for additional information to support or clarify your complaint: (Attach additional page(s), if necessary)

	Name	**Address**	**Telephone**
1.			
2.			
3.			
4.			

Discrimination Complaint Form

Have you filed, or intend to file, a complaint regarding the matter raised with any of the following? If yes, please provide the filing dates. Check all that apply.

- ☐ US Equal Employment Opportunity Commission Date:
- ☐ Federal Highway Administration Date:
- ☐ Federal Transit Administration Date:
- ☐ Federal or State Court Date:
- ☐ Other Date:

Have you discussed the complaint with any Greensboro Transit Authority representative? If yes, provide the name, position, and date of discussion.

Please provide any additional information that you believe would assist with an investigation.

Briefly explain what remedy, or action, you are seeking for the alleged discrimination.

****WE CANNOT ACCEPT AN UNSIGNED COMPLAINT. PLEASE SIGN AND DATE THE COMPLAINT FORM BELOW.**

_____	_____
COMPLAINANT'S SIGNATURE	**DATE**

MAIL COMPLAINT FORM TO:

City of Greensboro/Greensboro Transit Authority

Mailing:
PO Box 3136
Greensboro, NC 27401

Location:
223 W. Meadowview Road
Greensboro, NC 27406

FOR MORE INFORMATION VISIT THE WEB SITE:
www.ridegta.com
or call
336-373-2634

FOR OFFICE USE ONLY

Date Complaint Received: _____

Processed by: _____

Case #: _____

Referred to: ☐GTA Board ☐FTA ☐FHWA ☐DOJ Date Referred:_____

Greensboro Transit Authority
Title VI Complaint Log

Case #	Complainant	Respondent	Receiving Agency	Date Filed	Basis	Date of Report	Determination / Resolution