

Kingsport Area Transit Service

900 East Main Street
Kingsport, TN 37660
Grantee ID #05097

Language Assistance Implementation Plan For Limited English Proficient Persons

Updated April 2024



Prepared in accordance with Executive Order 13166 (August 11, 2000)

And USDOT LEP Guidelines 70FR 74087

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APPENDIX D

LIMITED ENGLISH PROFICIENCY PLAN

Kingsport Area Transit Service

This document serves as the plan for Kingsport Area Transit Service (KATS) to provide services to Limited English Proficiency (LEP) individuals in compliance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166: Improving Access to Service for Persons with Limited English Proficiency. The transit system has developed this Limited English Proficiency Plan to help identify reasonable steps to provide language assistance for LEP persons seeking access to KATS services. This plan details procedures on how to identify a person who may need language assistance, the ways in which language assistance may be provided, training staff, providing notice to LEP persons, and information for future updates.

FOUR FACTOR ANALYSES

In developing the LEP plan, KATS undertook the U.S. Department of Transportation policy guidance to utilize the four factor LEP analysis for assessing language needs and determining what steps should be taken to ensure access for LEP persons. The four factors include: 1) number of LEP individuals in the service area, 2) frequency of contact with LEP individuals, 3) importance of the program, and 4) resources available and costs.

- 1) The number or proportion of LEP persons eligible in the service area who may be served or likely to encounter a transit program, activity, or service. According to the United States Census Bureau 2022 Quick Facts and American Community Survey 5 year estimates approximately 3.0 % of Kingsport’s population speaks a language other than English at home. The KATS service area is 90.2 % white, 3.3% black or African American, 2.5% Spanish, 08% Other Indo-European languages, 1.3% Asian and Pacific Islander languages and .1% Other languages. (<https://www.census.gov/acs/www/about/why-we-ask-each-question/language/>) (<https://www.census.gov/quickfacts/fact/table/kingsportcitytennessee/PST045223>)

The following tables provide racial makeup and language spoken at home for the KATS

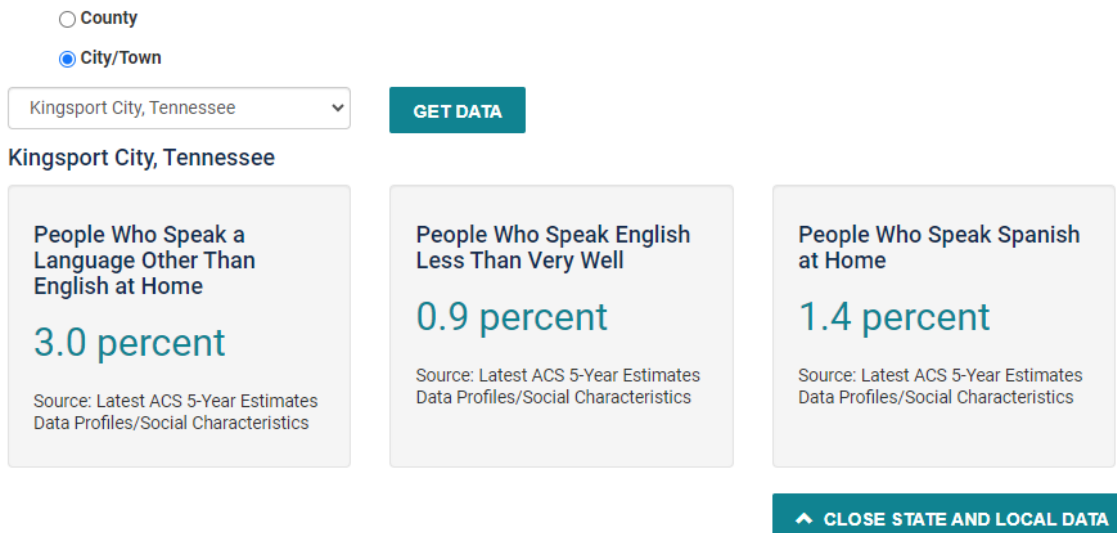
QuickFacts Kingsport city, Tennessee; United States What's New & FAQs

QuickFacts provides statistics for all states and counties. Also for cities and towns with a population of 5,000 or more.

Enter state, county, city, town, or zip code -- Select a fact -- CLEAR TABLE MAP CHART DASHBOARD MORE

Table

Race and Hispanic ...	Kingsport city, Tennessee	United States
Population estimates, July 1, 2023, (12/2023)	NA	334,914,895
PEOPLE		
Race and Hispanic Origin		
White alone, percent	90.2%	75.5%
Black or African American alone, percent (a)	3.3%	13.6%
American Indian and Alaska Native alone, percent (a)	0.1%	1.3%
Asian alone, percent (a)	1.3%	6.3%
Native Hawaiian and Other Pacific Islander alone, percent (a)	0.0%	0.3%
Two or More Races, percent	4.2%	3.0%
Hispanic or Latino, percent (b)	2.5%	19.1%
White alone, not Hispanic or Latino, percent	89.4%	58.9%



Language spoken at home data help communities:

Educate Children

We ask about language spoken at home in combination with other information, such as disability status, school enrollment, and poverty status, to help schools understand the needs of their students and staff. For more about how to find

People That Speak English Less Than "Very Well" in the United States

Click the image to view the interactive data visualization.



- 2) The frequency with which LEP individuals come in contact with a KATS program, activity, or service. KATS assesses the frequency at which staff and operators have or could possibly have contact with LEP persons. This includes documenting phone inquiries, request for translated documents, and surveying drivers. To date, KATS has had no requests for interpreters. Staff and drivers have had very little to no contact with LEP individuals. Currently, the frequency of contact with LEP persons associated with local public transportation services has not transpired at this juncture. There is no large geographic concentration of any one type of LEP individuals in the transit service area and no identified social, service, professional, or leadership organizations that focuses on outreach or membership of LEP individuals.

- 3) The nature and importance of the program, activity, or service provided by the transit system to the community. Public transportation can be vital to many people’s lives, especially those that have no other means of transportation. A KATS ridership survey in March 2023 indicated the primary trip purposes for transit customers were shopping and business, with medical trips being the second most identified trip. While KATS does provide an importation service for the community, the service is limited with no evening hours of service or weekend service available. Transit service is offered weekdays from 7:30 a.m. to 5:30 p.m., with four routes (buses) in operation in the morning and afternoon.

ADA paratransit services are provided by five lift-equipped vans and are operated citywide on a demand-response basis.

Although the transit system does provide service to the hospital, delay of access would not have life-threatening implications on LEP individuals, especially compared to the services provided by fire, police, and other emergency services. It is also believed that any delay of access to information provided by KATS would not have serious implications on a LEP individual.

- 4) Resources are available to KATS. Funds available for KATS for LEP services would be derived entirely from existing operating budgets and compete with other operational requirements on an annual basis. It is anticipated that the cost of providing transit services will continue to grow, with the major potential for cost increases in the foreseeable future due to national trends, such as insurance and fuel costs. No bilingual staff has been identified; however, oral interpreter and translation services have been established on as needed basis. KATS has also taken inventory of available organizations that the transit system could partner with for outreach and translation efforts.

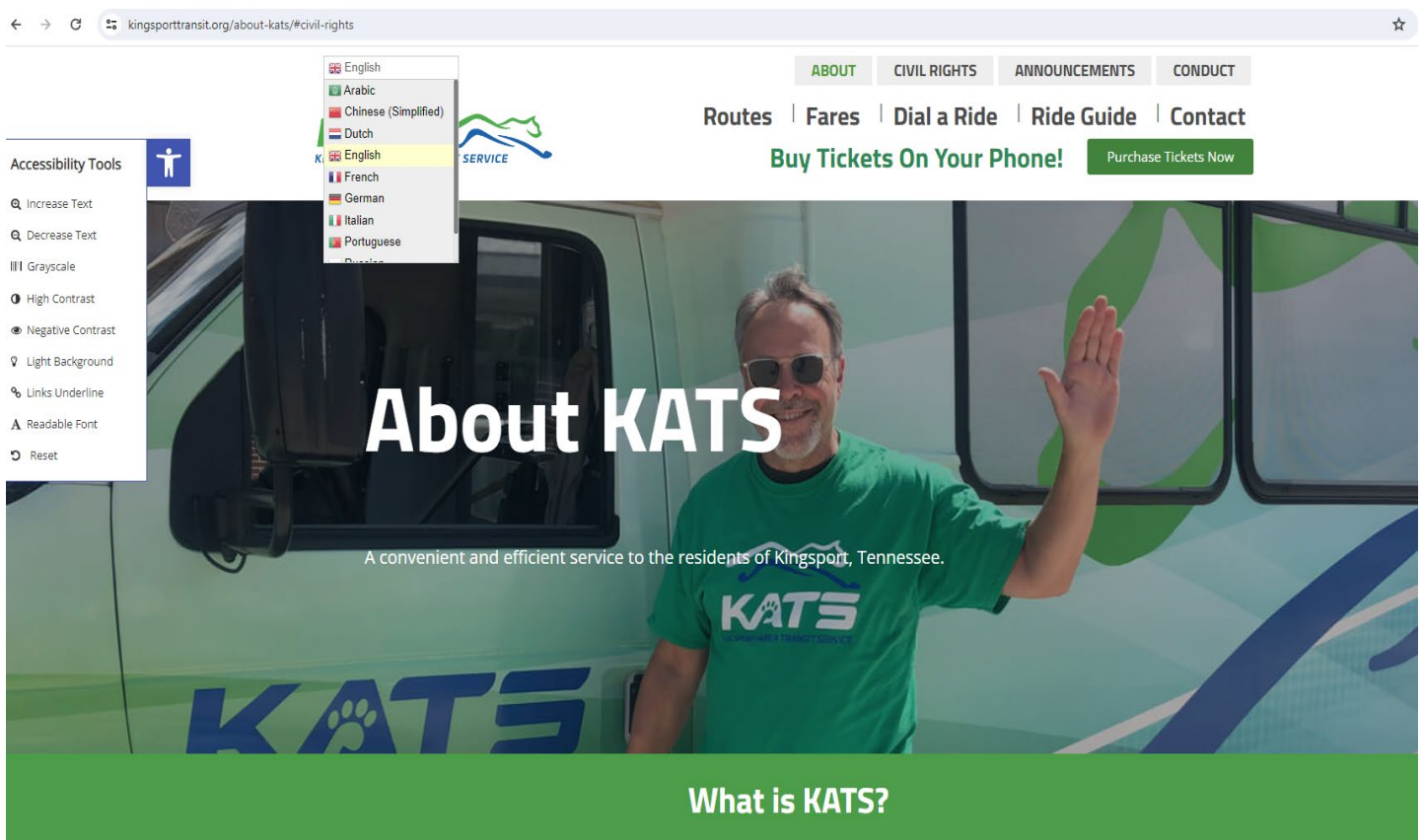
LANGUAGE ASSISTANCE MEASURES

KATS's LEP program was established after review of the four factors in the DOT LEP Guidance. As a result of this analysis, the transit systems LEP process was based on the limited frequency of contact with different types of languages and the low percentage of identified LEP populations. As a public transportation agency serving very few LEP persons, the transit system does not maintain an extensive LEP plan but has taken reasonable steps to provide access to programs and activities for LEP persons. Considering the relatively small scale of the KATS area, the small number of LEP individuals in the service area, and the limited financial resources, it is necessary to limit language aid to the most basic and cost-effective services. Language assistance measures currently available to KATS customers include:

- 1) Use of the Census Bureau's "I Speak Cards" by transit operators and staff to assist in identifying LEP individuals who need language assistance. These have currently been updated and all vehicles equipped with cards that show the phone number and access code needed to access a translator. The "how to" process was listed on our local February edition "KATS CHAT" newsletter for all employees to review. (see below)
- 2) Several local resources are available, and maintained on file, for assistance with individuals with limited English proficiency. These include colleges and universities that provide foreign language curriculums that will provide translation services with advanced notice. In addition, the KATS maintains a list of available translator services available with notice.

- 3) Local services can be a valuable resource, however; a reasonable time delay can be expected in contacting the appropriate translator. As a result, the transportation system has contracted with Avaza Language Services Corp. to provide oral translation services for languages other than English. We also have access to the City of Kingsport's account with Linguistics International.
- 4). The KATS website is able to be read in several different languages through a useful google tool installed on the website.

Our website allows a person to select any language by one click of a button. This option is available on every page on the KATS website at www.kingsporttransit.org.



Sample slide used during the Title VI Public meeting on February 20, 2024 to discuss LEP and disparate impact

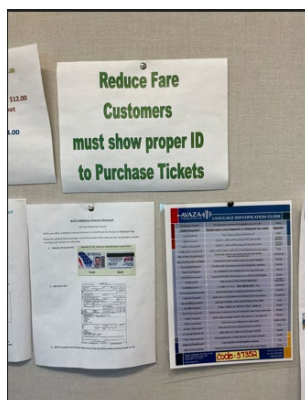
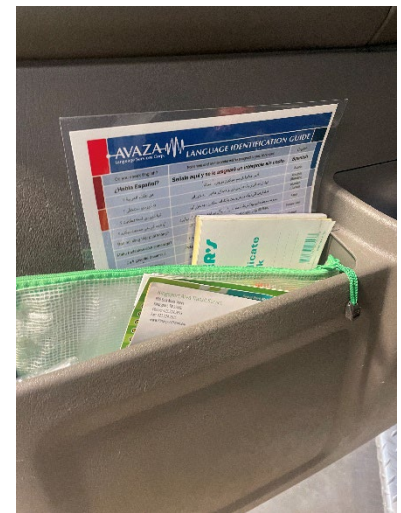
Example of Disparate Impact: (not intentional)

Example: 2 parks in the community are given the same amount of money for the upkeep and maintenance of the equipment. However, what is not taken into consideration is that there are many more people living in row houses. The equipment gets used more frequently and wears out quicker. This is discrimination, although unintentional.

STAFF TRAINING

It is important that staff members, especially those having contact with the public, know their obligation to provide meaningful access to information and services for LEP persons. Transit staff will be provided the LEP Plan and will be trained on procedures and protocols to follow. This information will also be part of the staff orientation process for new hires. Training topics include:

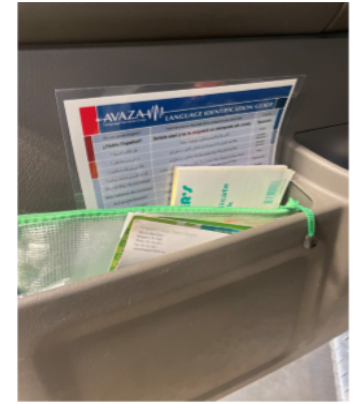
- 1) Understanding Title VI and LEP responsibilities
- 2) Use of the “I Speak Cards”; (located in the side pockets of bus and van doors).
- 3) How to access and use the oral interpretation services
- 4) Documentation of language assistance requests



The “I speak” card is also placed in the dispatch area where KATS dispatcher interact with employees at the window. This allows easy access should KATS ever need language assistance.

 AVAZA Language Services Corp.			LANGUAGE IDENTIFICATION GUIDE		
Do you speak English?	Point here and an interpreter will be assigned to you, at no cost.	English			
¿Habla Español?	Señale aquí y se le asignará un intérprete sin costo.	Spanish			
هل تتكلم العربية؟	أشرك هنا والترجم سيكون موجوداً مجاناً.	Arabic			
هه کوردی دمهخالی؟	نیشارت فێرن یکه نەرجومان بز نەجازار دکنین ، به خواری.	Kurdish (Behdini)			
ئايا کوردی قسه دهکامیت؟	نیشارت لێزه یکه موهرجهت بزنامده دهکامین . به خواری.	Kurdish (Sorani)			
آیا شما فارسی صحبت می کنید؟	ترجمه در خدمت شما میباشد اما اینجا « به زبان های گوناگون قرار میگیرد.	Farsi			
Bạn nói tiếng Việt phải không?	Chỉ vào đây và sẽ có người thông dịch viên giúp đỡ Bạn. Bạn không phải trả gì hết.	Vietnamese			
Maku hadashaa afka soomaaliga?	Haikaan farta ku-ifiq turjubaan lacag la-an ayaad heleysaa.	Somali			
Da li govornik Bosanski?	Pokažite ovdje i prevodilac će vam biti obezbijeđen, besplatno.	Bosnian			
Parlez-vous française?	Ici, un interprète sera assigné pour vous, sans avoir payé.	French			
ທ່ານເວົ້າພາສາລາວແມ່ນບໍ່?	ກະສອນຍອມ:ຈຶ່ງເຫມາະດີຕາມນິ້ຈະມີນາຍພາສາມາເປໃຫ້ທ່ານໄດຍບໍ່ໄດ້ເສັ່ງເງິນ.	Laotian			
你會講中文嗎？	請點在這裡我們為你免費提供翻譯服務。	Chinese (Mandarin)			
日本語を話せますか？	ここを指して下さい。無料の通訳者を指定します。	Japanese			
Je-una azungumza kiswahili?	Nyosha kidola hapa na utafafasiwa bila kulipa chochote.	Kiswahili			
Voce fala Portugues?	Aperte aqui e um intérprete lhe será fornecido sem custo algum.	Portuguese			
कया आप हिंदी बोल सकते हैं ?	इधारा यहाँ पर किजिये, भाषांतर करनेवाले विनामूल्य मिल जायेंगे।	Hindi			
한국어를 하십니까?	여기를 지적해주시면 통역자가 무료로 호출됩니다.	Korean			
Вы говорите по-русски?	Укажите сюда, и совершенно бесплатно Вам будет предоставлен переводчик.	Russian			
አማርኛ ይናገሩለሉ??	በዋናው ወይዘራ ያሙሉኩት ያለምንም ነገር እስተርጓሚ ይዘውሰዩትል!	Amharic			
Eske ou pale kreyl?	Pwen isit la e you entèprèt ap vin ede'w gratis.	Haitian Creole			
Jin kueni Thuok nuera?	Wane eme deri thuok nuera jek ke kuic du a thii kok.	Nuer			
તમે ગુજરાતી બોલી શકો છો?	અહીંયા ઉભરો કરો, ભાષાંતર કરવાટે વિનામુલ્યે મળી જશે.	Gujarati			
Turkçe biliyor musunuz?	Burayı gösterirseniz, ücretsiz tercüman size yardım edecektir.	Turkish			
คุณพูดภาษาไทยหรือไม่?	กรุณาบอกให้ทราบด้วยถ้าคุณต้องการคนแปล	Thai			
Afaan Oromoo nidubata	Harkake asiti baasi gargasa Afaan hikaa malaqa duwa argaata.	Oromo			
Avaza Language Services Corp. 5209 Linbar Dr. Suite 603 Nashville, TN 37211 www.avaza.co			Code: 37352		tel: 615.534.3400 fax: 615.810.8506 800.482.8292

LEP: Limited English Proficient @ KATS



It is vital that we, as a service organization know how to communicate with people that speak different languages. Although we do not encounter this often, we do need to know how to should the occasion arise. We plan to do a brief training on LEP sometime this year; however, until then, please note the following.

- 1). Avaza I speak cards have been placed in each driver side door in each vehicle.
- 2). Should you encounter an individual who speaks another language, you may have them point to the language they are speaking.
- 3). Call the number on the lower right hand side of the card, and give the operator our access code.
- 4). A translator will be provided for you.

Posted in the February edition of “KATS CHAT” ...our local newsletter given to employees and other City of Kingsport leaders.

PROVIDING NOTICE TO LEP PERSONS

In order to advise the public on their rights under Title VI, and to provide notice to LEP persons that language assistance measures are available, the following options are available and will be incorporated, as appropriate:

- 1) Notices indicating that language assistance is available posted at various municipal transit properties.
- 2) Stating in documents and outreach materials that language services are available.
- 3) Working with community-based organizations and other stakeholders to inform LEP individuals of available services.
- 4) Providing statements in public notices that services are available for persons requiring special accommodations for disabilities or language assistance.

MONITORING AND UPDATING THE LEP PLAN

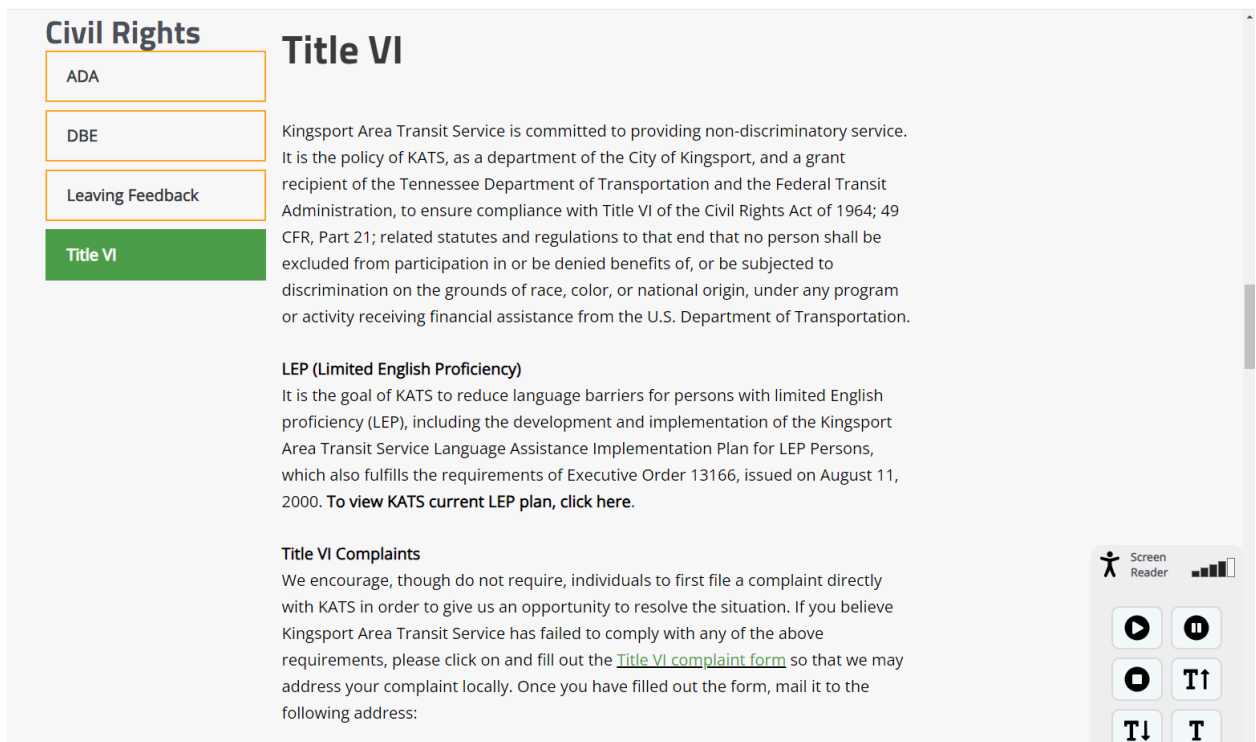
This plan is designed to be flexible and one that can be easily updated. At a minimum, KATS will follow the Title VI Program update schedule to review the LEP process. Each update should examine all plan components including:

- 1) How many LEP persons have been encountered?
- 2) What is the current LEP population in the service area?
- 3) Are the existing language assistance measures meeting the current needs?
- 4) Have available resources, such as technology, changed?
- 5) Were any complaints received?

DISSEMINATION OF THE LEP PLAN

KATS will post the LEP Plan on the transit page www.kingsporttransit.org

Copies the plan will be provided to any person or agency requesting a copy and LEP persons may obtain copies/translations of the plan upon request. Any questions or comments regarding this plan should be directed to KATS staff at 423-224-2613 or the Civil Rights Program Administrator at 423-343-9711.



The screenshot shows a website page with a navigation menu on the left under the heading "Civil Rights". The menu items are "ADA", "DBE", "Leaving Feedback", and "Title VI", with "Title VI" highlighted in green. The main content area is titled "Title VI" and contains the following text:

Kingsport Area Transit Service is committed to providing non-discriminatory service. It is the policy of KATS, as a department of the City of Kingsport, and a grant recipient of the Tennessee Department of Transportation and the Federal Transit Administration, to ensure compliance with Title VI of the Civil Rights Act of 1964; 49 CFR, Part 21; related statutes and regulations to that end that no person shall be excluded from participation in or be denied benefits of, or be subjected to discrimination on the grounds of race, color, or national origin, under any program or activity receiving financial assistance from the U.S. Department of Transportation.

LEP (Limited English Proficiency)
It is the goal of KATS to reduce language barriers for persons with limited English proficiency (LEP), including the development and implementation of the Kingsport Area Transit Service Language Assistance Implementation Plan for LEP Persons, which also fulfills the requirements of Executive Order 13166, issued on August 11, 2000. [To view KATS current LEP plan, click here.](#)

Title VI Complaints
We encourage, though do not require, individuals to first file a complaint directly with KATS in order to give us an opportunity to resolve the situation. If you believe Kingsport Area Transit Service has failed to comply with any of the above requirements, please click on and fill out the [Title VI complaint form](#) so that we may address your complaint locally. Once you have filled out the form, mail it to the following address:

In the bottom right corner of the screenshot, there is a "Screen Reader" accessibility widget with icons for play, pause, stop, and text-to-speech.