



**City of Bowling Green  
Federal Transit Administration 5307 Funding  
Title VI Program**

**2017 Update**

**Approved by the City of Bowling Green  
Board of Commissioners, May 16, 2017**

**Community Action of Southern Kentucky  
dba/ GO bg transit**



## **Contents of Plan**

- A. – Title VI Policy Statement
- B. – Title VI Public Outreach Overview
- C. – Title VI Complaint Procedures
- D. – Title VI Complaint Form
- E. – Title VI Investigations/Complaints or Compliance Reviews
- F. – Title VI System – Wide Service Standards and Policies
- G. – Language Access Plan

## GO bg Transit System Title VI Policy Statement

The GO bg Transit System is operated by Community Action of Southern KY on behalf of the City of Bowling Green. Service is presently provided on five fixed routes and para-transit services are provided through the GO bg Too Transit system.

The City of Bowling Green grants all citizens equal access to its transportation services and is committed to a policy of non-discrimination in the conduct of all business. It is the City's policy to utilize its best efforts to make citizens aware of their rights as provided by Title VI of the Civil Rights Act of 1964.

Title VI of the Civil Rights Act of 1964, as amended, protects any person in the United States on the ground of race, color, or national origin from being excluded from participation, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal financial assistance from the Department of Transportation.

Toward this end, it is the City's objective to:

- Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin
- Identify and address, as appropriate, disproportionately high and adverse human health and environmental effects, including social and economic effects of programs and activities on minority populations and low-income populations;
- Promote the full and fair participation of all affected populations in transportation decision making;
- Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations
- Ensure meaningful access to programs and activities by persons with limited English proficiency.

The City Grants Coordinator and the transit provider share the responsibility for carrying out the City's commitment to Title VI. They are responsible for the day-to-day operation of the program and investigate all Title VI complaints that come through the complaint procedures process.

## Title VI Public Outreach Overview

The City of Bowling Green posts a copy of its Title VI public notice in the common areas of the offices of the Department of Neighborhood and Community Services and on the City of Bowling Green website located at [www.bgky.org](http://www.bgky.org). The notice is available in English, Spanish, and Bosnian. These represent the three main languages spoken in the city, as determined in the City of Bowling Green LEP Plan.

The City of Bowling Green does not operate a transit system. The service for the GO bg Transit System is contracted through Community Action of Southern KY (CASK). CASK uses a variety of methods to disseminate Title VI information to its riders. Title VI notices are made available to CASK in English, Spanish and Bosnian. Community Action of Southern KY posts similar notices in the following locations:

<b>Location</b>	<b>Room(s)</b>
Community Action Central Office	Lobby
Community Action Annex	Driver's Room
Transit Center of Bowling Green	Lobby, Driver's Room, Light Maintenance Office
All Fixed Route Vehicles	Behind Driver
All ADA Para Transit Vehicles	Behind Driver

The City of Bowling Green is governed by an elected Board of Commissioners (4) that each serves a two year term and a mayor that serves a four year term. The Board of Commissioners appoints members to a total of 33 separate boards, none of which oversee the operation or management of the transit program. The oversight of operations and managements of the transit program is provided by two boards related to Community Action of Southern KY, Transit Advisory Committee and the Community Action Board of Directors.

### Community Action Board of Directors

Organization Representative	Sector	Race/ Ethnicity	Sex
Allen County Judge Executive	Public	C	M
Barren County Judge Executive	Public	C	M
Butler County Judge Executive	Public	C	M
Edmonson County Judge Executive	Public	C	M
Hart County Judge Executive	Public	C	M
Logan County Judge Executive	Public	C	M
Metcalf County Judge Executive	Public	C	M
Monroe County Judge Executive	Public	C	M
Simpson County Judge Executive	Public	C	M
Warren County Judge Executive	Public	C	M
Deborah Claypool, Head Start Policy Council Rep.	Other	B	F
Velen Furlon-Barren County	Other	C/H	F
Darnelle Gearlds-Monroe County Head Start	Other	C	F
Deborah Claypool-Warren County	Other	B	F
Cheryl Payne-Logan County	Low Income	B	F

Carolyn Parnell-Metcalf County	Low Income	C	F
Carole Sindelar, Simpson County	Low Income	C	F
Mae Pitcock-Monroe County	Low Income	C	F
Connie Gill-Simpson County	Low Income	B	F
Garry Robbins-Butler County	Other	C	M
Daniel Frantz, Simpson County	Low Income	C	F
Rebecca Tyree-Butler County, Vice Chairman	Low Income	C	F
Vickie Walker-Edmonson County	Low Income	C	F
Carol Kees-Logan County	Other	B	F
Virginia Davis-Hart County	Other	C	M
Bobby Young-Allen County	Other	C	M
Amy Parker-Barren County	Low Income	C	F
Phillip Trent-Hart County	Low Income	C	F
Rebecca Hancock-Warren County	Low Income	B	F
Total Members:29 Race/Ethnicity: Caucasian 22 Black 6 Hispanic 1 Sex: Female 16 Male 13			

**Transit Advisory Committee**

Organization Representative	Race/ Ethnicity	Sex
AARP	C	F
City of Bowling Green, Public Works	C	F
Southcentral KY Community and Technical College	C	M
Bowling Green MPO	C	F
Lifeskills (Sheltered Workshops)	C	F
Lifeskills (Service Centers)	C	F
Barren River Area Development District	C	F
WKU Parking and Transportation Director	C	F
WKU Topper Transit Manager	C	M
Wal Mart Manager	C	F
Greenview Regional Hospital	C	M
CEO Community Action of Southern KY	C	F
Transportation Manager Community Action of Southern KY	C	F
Public Transit Coordinator Community Action of Southern KY	C	M
International Communities Liaison City of Bowling Green	H	F
Driver, GO bg transit	B	F
Barren River Area Safe Space	C	F
South Central KY Council of The Blind (Blind)	C	F
Bowling Green Public Works (Director)	C	M
	C	M
Total Members: 20 Race/Ethnicity: Caucasian 18 Hispanic 1 Black 1 Sex: Female 14 Male 6		

Before significant changes are made that would affect any person's ability to access transit services, staff with the City and CASK will receive input from all parties and representatives from other community based organizations. When decisions are made that directly affect the overall level of service provided, all individuals are given opportunity to provide commentary. These decisions would include change in service, fee changes, additional routes, changes in para-transit services or any other effective decision. Individuals will be provided the opportunity to make comments either in person or in writing to the City of Bowling Green or CASK. Both organizations are located in predominately low-income areas and are along existing transit routes.

Bowling Green is home to several local organizations that provide essential services to low income residents. The City of Bowling Green and CASK will discuss proposed changes with these organizations to determine how the change might impact their clientele.

The City of Bowling Green monitors Title VI compliance by reviewing complaints, if received, monthly reports and monthly DBE reports. The City has membership on the Transit Advisory Committee to assist in making sure that services are provided equally and fairly. Staff from GO bg Transit routinely make presentations to the Bowling Green Board of Commissioners and work directly with staff on changes and updates to the Transit program.

The GO bg Transit System rarely undertakes construction activities. If a National Environmental Policy Act (NEPA) activity is going to take place with FTA funding, the City of Bowling Green and CASK will integrate Environmental Justice into their NEPA documentation. If the City of Bowling Green or CASK will be completing documentation related to a Categorical Exclusion (CE), staff will use the standard FTA CE Checklist. If the project will require an Environmental Assessment (EA) or an Environmental Impact Statement (EIS), staff will integrate environmental justice analyses that include the following components:

- A description of low-income and minority population within the affected area with a discussion of source methodology.
- A description of all the effects, both adverse and positive, of the project both during and after construction that would affect the identified minority and low-income population.
- A description of all mitigation and environmental enhancement actions incorporated into the project to address the adverse effects.
- A description of other effects and a justification on why additional mitigation was not proposed.
- When projects affect both minority and low-income areas and non-minority and non-low-income areas, a comparison of mitigation and environmental actions for both areas should be completed. If a determination is made that there is no basis for comparison, a description should be included.

The City of Bowling Green or Community Action of Southern KY have any pending FTA related construction projects that would require an equity analysis.

## Title VI Complaint Procedures

The City of Bowling Green, Kentucky, is committed to a policy of non-discrimination in the conduct of its business, including its Title VI responsibilities for the delivery of equitable and accessible transportation services. It is the City's policy to utilize its best efforts to assure that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under its program of transit service delivery and related benefits.

These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990, for alleged discrimination in any program or activity administered by the City.

These procedures do not deny the right of the complainant to file formal complaints with other State or Federal agencies or to seek private counsel for complaints alleging discrimination. Every effort will be made to obtain early resolution of complaints at the lowest level possible. Any individual, group of individuals or entity that believes they have been subjected to discrimination prohibited under Title VI and related statutes may file a complaint.

The following measures will be taken to resolve Title VI complaints:

1) A formal complaint must be filed within 180 days of the alleged occurrence. Complaints shall be in writing and signed by the individual or his/her representative, and will include the complainant's name, address and telephone number, name or description of alleged discriminating respondent, basis of complaint (race, color, or national origin), and the date of alleged act(s). A statement detailing the facts and circumstances of the alleged discrimination must accompany all complaints.

The City of Bowling Green strongly encourages the use of the official Title VI Complaint Form when filing official complaints. Reasonable measures will be undertaken to preserve any information that is confidential.

The preferred method is to file your complaint in writing using the Title VI Complaint Form, and sending it to:

City of Bowling Green  
Neighborhood & Community Services  
Grants Coordinator  
PO Box 430  
Bowling Green, KY 42102-0430

2) In the case where a Complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to the Grants Coordinator of the City of Bowling Green's Neighborhood & Community Services Department (NCS). Under these circumstances, the Complainant will be interviewed, and the Grants

Coordinator will assist the Complainant in converting the verbal allegations to writing. The City will provide appropriate assistance to complainants who are limited in their ability to communicate in English.

- 3) When a complaint is received, the Grants Coordinator will provide written acknowledgment to the Complainant, within fifteen (15) days by registered mail.
- 4) If a complaint is deemed incomplete, additional information will be requested, and the Complainant will be provided 60 days to submit the required information. Failure to do so may be considered good cause for a determination of no investigative merit.
- 5) Within 20 business days from receipt of a complete complaint, the City will determine its jurisdiction in pursuing the matter and whether the complaint has sufficient merit to warrant investigation. Within seven (7) days of this decision, the Grants Coordinator or his/her authorized designee will notify the Complainant and alleged discriminating respondent, by registered mail, informing them of the disposition.
  - a. If the decision is not to investigate the complaint, the notification shall specifically state the reason for the decision.
  - b. If the complaint is to be investigated, the notification shall state the grounds of the City's jurisdiction, while informing the parties that their full cooperation will be required in gathering additional information and assisting the investigator.
- 6) When the City of Bowling Green does not have sufficient jurisdiction, the Grants Coordinator or his/her authorized designee will refer the complaint to the appropriate State or Federal agency holding such jurisdiction.
- 7) If the complaint has investigative merit, the Grants Coordinator or his/her authorized designee will fully investigate the complaint. A complete investigation will be conducted, and an investigative report will be submitted to the City Manager within 60 days from receipt of the complaint. The report will include a narrative description of the incident, summaries of all persons interviewed, and a finding with recommendations and conciliatory measures where appropriate. If the investigation is delayed for any reason, the Grants Coordinator will notify the appropriate authorities, and an extension will be requested.
- 8) The City Manager or his/her authorized designee will issue letters of finding to the Complainant and Respondent within 90 days from receipt of the complaint.
- 9) If the Complainant is dissatisfied with the City's resolution of the complaint, he/she has the right to file a complaint with the:

Federal Transit Administration Office of Civil Rights  
Attention: Title VI Program Coordinator  
East Building, 5th Floor - TCR  
1200 New Jersey Ave., SE  
Washington, DC 20590

City of Bowling Green  
Kentucky

Title VI Complaint Form

If you would like to submit a Title VI complaint to the City of Bowling Green, please complete this form and mail it to: City of Bowling Green, Neighborhood & Community Services, Grants Coordinator, PO Box 430, Bowling Green, KY 42102-0430.

For questions or a full copy of the City of Bowling Green's Title VI Policy Statement, please write City of Bowling Green, Neighborhood & Community Services, Grants Coordinator, PO Box 430, Bowling Green, KY 42102-0430 or call (270) 393-3659.

1. Name (Complainant):  	
2. Phone:  	3. Home Address (Street No., City, State, Zip)  
4. If applicable, name person(s) who allegedly discriminated against you:  	
5. Location and position of person(s) if known:  	6. Date of Incident  
7. Is this complaint the result of an Title VI appeal from a Contract Provider?  <input type="checkbox"/> Yes <input type="checkbox"/> No    If YES, then what agency: _____	
8. Discrimination because of:  _____	
9. Explain as briefly and clearly as possible what happened and how you believe you were discriminated against. Indicate who was involved. Be sure to include how you feel other persons were differently than you. Also, attach any written material pertaining to your case.          	
10. Why do you believe these events occurred?  	

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11. What other information do you think is relevant to the investigation?

12. How can this/these issue(s) be resolved to your situation?

13. Please list below any person(s) we may contact for additional information to support or clarify your complaint (witnesses):

Name:	Address:	Phone Number:
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14. Have you filed this complaint with any other Federal, State, or local agency or with any federal or state court?

YES       NO

If yes, check all that apply.

Federal Agency       Federal Court       State Court

Local Agency       State Agency

If filed at an agency and/or court, please provide information about a contact person at the agency/court where the complaint was filed.

Agency/Court	Contact's Name	Address	Phone Number
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Signature (Complainant):

X

Date of Filing:

/ /

## City of Bowling Green

### Title VI Investigations/Complaints or Compliance Reviews

Date Filed	Entity or Organization Where the Investigation was Filed	Purpose	Summary of Findings	Status

\* Currently there are no Title VI open Complaints/Investigations/Compliance Reviews as of 5/16/17 and no Title VI Complaints/Investigations/Compliance Reviews in the last three years



# ***Service Standards and Policies***



## Table of Contents

<a href="#">SUMMARY</a> .....	3
<a href="#">1. Introduction</a> .....	4
<a href="#">1.1 Overview</a> .....	4
<a href="#">1.2 Application</a> .....	4
<a href="#">1.3 Updating</a> .....	5
<a href="#">2. Productivity Standards</a> .....	6
<a href="#">2.1 Use of Standards</a> .....	6
<a href="#">2.2 Ridership and Economic Measures</a> .....	6
<a href="#">2.2.1 Performance Measures</a> .....	6
<a href="#">2.2.2 Passengers per revenue hour and revenue mile</a> .....	6
<a href="#">3. Vehicle Load</a> .....	8
<a href="#">3.1 Maximum Load Standard</a> .....	8
<a href="#">4. Vehicle Headway</a> .....	9
<a href="#">4.1 Minimum Service Frequency</a> .....	9
<a href="#">5. Service Availability</a> .....	10
<a href="#">5.1 Design Standards</a> .....	10
<a href="#">5.1.1 Directness of Route</a> .....	10
<a href="#">6. Vehicle Assignment Targets</a> .....	11
<a href="#">7. On Time Performance</a> .....	12
<a href="#">8. Distribution of Transit Amenities</a> .....	13
<a href="#">8.1 Bus Shelters</a> .....	13
<a href="#">8.2 Benches</a> .....	13
<a href="#">8.3 Bus Schedules and Route Maps</a> .....	13
<a href="#">9. Transit Security</a> .....	14
<a href="#">GO bg transit Goals</a> .....	15
<a href="#">GO bg transit Mission Statement</a> .....	16

## SUMMARY

GO bg transit was started in 1993 by Community Action of Southern Kentucky with funds from United Way. The City of Bowling Green Kentucky had no public transit service in place at that time. In 2003, the City of Bowling Green became eligible to receive 5307 funding for transit. Community Action continues to provide the service as a contract provider to the City. The City competitively procures a contract provider for transit services every 3 years. GO bg transit works with community partners to obtain other funding opportunities to add additional shelters and amenities for the routes as funding permits. GO bg transit partners with property owners when possible to include transit amenities in new development and property refurbishment when it will serve the riders of the transit and be readily accessible, meeting Americans with Disabilities Act (ADA) requirements. The City of Bowling Green previously assisted GO bg transit with funding from Community Development Block Grants (CDBG) to obtain bus shelters. Additional amenities are being developed as funding permits.

The City of Bowling adopted Title VI Policies and Procedures to ensure service design and operations practices do not result in discrimination on the basis of race, color, or national origin. Service policies differ from service standards in that they are not necessarily based on quantitative threshold.

# 1. Introduction

## 1.1 Overview

GO bg transit continually receives requests for changes to existing service and for new service in growing areas of the City. Additionally, GO bg transit may be operating some services that are not attracting enough riders to justify their cost. In order to be consistent in the evaluation of service proposals, and to ensure that the service being provided represents the most cost-effective use of the City's resources, a set of service standards is maintained by GO bg transit.

The specific procedure for applying these standards is presented in this document. Since service standards are intended to optimize usage of the City's resources, they are updated periodically to reflect changes in the City goals and resources. The procedure for updating the standards is described in Section 1.3.

GO bg transit ensures that no person or groups of persons shall be discriminated against with regard to the routing, scheduling, or quality of service of transportation service furnished as part of the project on the basis of race, color, or national origin. Furthermore frequency of service, age and quality of vehicles assigned to routes, quality of stations serving different routes, and location of routes shall not be determined on the basis of race, color, or national origin.

## 1.2 Application

The standards are used to evaluate existing services and to evaluate proposals for new service. These standards are a benchmark by which service operations performance may be monitored and analyzed.

The application of standards to existing routes is a flexible process. The purpose of the standards is to help identify routes which are most in need of service changes, such as restructuring to eliminate lower-productivity segments or branches, adjusting service frequency to better reflect the demand for service, or providing additional marketing efforts to promote less patronized routes where appropriate. Routes which do not meet standards are not automatically designated for elimination. Elimination of routes is only intended as a last resort, when it has been determined that no cost-effective actions are available to improve the productivity of the route.

The standards for evaluation of existing routes are not intended to preclude changes to routes that meet these minimum standards. In many cases, it may be possible to improve the productivity of routes that meet the minimum standards by making changes to headways or trip times. Since the goal of GO bg transit is to "provide safe, clean, reliable, courteous, cost-effective public transit", these standards should not be used to prevent changes to improve the efficiency of existing routes, as long as the changes meet the route design standards.

The evaluation of new service proposals will take place as proposals are received or needs identified. The most recent standards for existing routes will be used to evaluate the proposed new services. Decisions regarding implementation of new routes will be made through the service planning process. New routes will be expected to meet all applicable route design standards described in Chapter 2, but will not be expected to meet the productivity standards described in Chapters 2 and 3 until they have been in operation for at least 24 months.

## 1.3 Updating

The service standards are intended to support the goals and objectives of the City of Bowling Green, KY and GO bg transit. Since these objectives and the resources available to attain them can be expected to change over time, the standards will be revised periodically to reflect those changes.

The service standards will be reviewed on a bi-annual basis. At that time, experience with the service standards over the previous time period, as well as changes in the City's goals and objectives, will be used to determine whether any standards should be added or revised.

The productivity standards will be updated each year, using ridership, revenue and cost figures for the most recent twelve-month period for which data are available. The rankings are based only on those routes that existed for the entire year. Routes which were eliminated during the year will not be included because they cannot be identified as candidates for revisions. Routes that were introduced during the year will not be included in determining the new standards since they are not required to meet the productivity standards until they have been in operation for at least 24 months. However, these routes will be evaluated separately, using the service standards contained in this document.

The updating procedure will compare the productivity standards with those in effect for the previous year. Operating cost data for the previous year will be revised to account for system-wide increases or decreases in operating cost.

## 2. Productivity Standards

### 2.1 Use of Standards

The productivity standards are used to identify routes and services for appropriate marketing and possible revision or elimination. Separate standards are identified for each class of service. Routes are evaluated on ridership (either boardings per in-service hour or mile, depending on the class of service).

New services should meet the applicable standards for their class of service after twenty-four months of operation. All new services will be reviewed after twenty-four months of operation and routes that have not shown adequate progress toward meeting the standards will be targeted for cost-effective actions to increase productivity or for elimination.

For the purpose of applying the standards, routes will be divided into two groups based on area-type and land-use designations:

**Local Route** – providing a basic level of transit access throughout the city, and operate in all periods. These routes operate primarily in arterial corridors. Commercial routes operate at a frequency of at least 60 minutes.

**University Route** – these routes service high demand, densely populated areas near Western Kentucky University, with direct service to campus. These routes are held to high standards to justify their limited market. University routes operate at a greater frequency when school is in session.

The standards for evaluating portions of routes are intended for use in identifying needed service improvements, for making modifications to specific portions of existing routes, or for identifying low productivity segments of routes.

These standards could be used in situations such as isolating low productivity portions of otherwise productive routes or measuring options for bringing unproductive routes into compliance with the overall service standards. These standards may also be used to evaluate proposals for new route extensions or deviations on existing routes.

### 2.2 Ridership and Economic Measures

GO bg transit's approach is to develop transit services suited to a variety of travel markets. All services are designed to match the level of service with demand, thus improving performance and sustainability. This results in multiple domains of acceptable performance for the various classes of service. The objective is to maximize overall ridership with the available resources.

#### 2.2.1 Performance Measures

Performance will be monitored and measured using the following metrics:

- Passengers/hour
- Passengers/mile

Passengers per hour refer to the number of passengers per in-service (revenue) hour. Passengers per mile refer to the number of passengers per revenue mile.

#### 2.2.2 Passengers per revenue hour and revenue mile

GO bg transit has employed a method to monitor service performance measures to assure optimal productivity levels for public transportation services. Measures have been established to determine if a route is operating at an "E" (Exceeds), "S" (Satisfactory), "M" (Marginal), and "U" (Unsatisfactory) level of performance. The following actions are taken based on the level of

performance findings:

- E = Consider headway improvements □ S = No change □ M or U = headway reductions, operation at policy headways, marketing, redesign or elimination. Routes are evaluated based on the number of total passengers carried per revenue hour, and total passengers per revenue mile. A system wide benchmark of 10 passengers per hour was set. Routes are organized into two subcategories and respective performance standards are summarized in the **Figure 1** below.

Figure 1. Passenger per revenue hour and mile by service category

<b>Local Route</b>		<b>Pass/Hour</b>	<b>Pass/Mile</b>
	Exceeds	>10	>3.5
	Satisfactory	5-10	2.5-3.5
	Marginal	5	1.5-2.0
	Unsatisfactory	<5	<1.5
<b>University Route</b>		<b>Pass/Hour</b>	<b>Pass/Mile</b>
	Exceeds	>10	>3.5
	Satisfactory	5-10	3-5
	Marginal	5	1.5-3
	Unsatisfactory	<5	<1.5

GO bg transit has employed a method to monitor service performance measures to assure optimal productivity levels for public transportation services. These figures represent the average for all hours of operation. Routes experience peak periods much the same as roads do during go to work, go home from work and peak class times on University routes during school.

### 3. Vehicle Load

#### 3.1 Maximum Load Standard

For local routes in the peak periods, the maximum load standard is 125% of a seated load at the maximum load point. For commercial and university routes outside of the peak periods and regional routes for all periods the maximum load is the seated capacity of the bus.

Figure 2. Maximum Load Standard

\* Peak intervals: Monday-Friday between 7:00 am and 9:00 am and Monday-Friday between 2:00 pm to 5:30 pm

<b>Service Type</b>	<b>Time</b>	<b>Load Standard</b>
<b>Local Route</b>	Peak*	125% Seated Capacity
	Off Peak	Seated Capacity
<b>University Route</b>	Peak*	125% Seated Capacity
	Off Peak	Seated Capacity

## 4. Vehicle Headway

### 4.1 Minimum Service Frequency

New routes shall provide the minimum frequencies specified below. Existing services that cannot meet these minimum standards while adhering to the minimum passengers per hour or trip standards defined in Chapter 2 shall be identified as candidates for service changes or appropriate marketing promotion within available resources. These service changes may include providing service with longer headways if no other viable alternative exists. Elimination of the route may be considered if service changes and/or promotional efforts do not improve productivity.

These are “policy” service levels and represent a compromise between economic efficiency and the functionality of the system. To be sustained at these levels, a route must meet the minimum ridership performance standards discussed in Section 2.2.1. Routes providing frequencies higher than the policy minimum must be justified by ridership demand.

The following table indicates the minimum frequency standard for types of service and time of day.

Service Type	Time Frame	Minimum Frequency
Local Route	Peak*	60 min
	Off Peak	60 min
University	Peak*	30 min
	Off Peak	60 min

Figure 3.  
Minimum  
Service  
Frequency

For routes meeting the above frequency, ridership, and load standards, frequency better than every 30 minutes may be provided when and where justified by ridership and funding is available. This standard applies equally to all service categories. In order to be sustainable, higher frequency service must meet the following criteria:

- Incremental frequency necessary to maintain the appropriate load standard during any 30 minute time period.
- When a service exceeds the maximum load standard, higher frequency may be justified during that time period and/or route segment.

Service frequency in the GO bg transit network is based on ‘clock pattern’ schedules. This pattern provides consistent and easy to understand schedules for our customers, and makes possible the provision of timed transfer connection hubs, whereby multiple routes are scheduled to meet at one location to facilitate connections. In general, routes are scheduled to operate in even increments of 30 minutes, or every 60, 30, or 15 minutes. However, other frequencies may be provided depending upon passenger demand, or operational and scheduling needs.

## 5. Service Availability

### 5.1 Design Standards

A transit operator inevitably receives many requests for service from citizens who are not within walking distance of any route, or who desire that buses operating in their neighborhoods serve different destinations. Since transit resources are limited, it is unlikely that everyone will be accommodated to a satisfactory degree. Therefore, it is necessary to determine how to allocate the available resources to provide the best possible service. In designing service the following variables will be considered:

- Population density (current and projected)
- Employment density (current and projected)
- Service area characteristics (age, income, auto's per household)
- Enhancement of timed transfers
- Destinations:
  - **Employers:** Employers with 300 or more employees are large enough to warrant consideration for service. This standard applies to both individual employers and groups of employers in a concentrated area.
  - **Hospitals/Nursing Homes:** These do not attract a large number of trips. These facilities do, however, often serve those who depend on transit.
  - **Colleges/Schools:** Students comprise a measurable segment of GO by transit's ridership. For this reason, colleges and high schools have been included in the availability standard. Those institutions with an enrollment of at least 1,000 students warrant consideration of service.
  - **Shopping Centers:** Shopping trips constitute a major reason for transit travel. Shopping centers with more than 100,000 square feet of leased retail space are large enough to warrant consideration for GO by transit service. Mixed-use retail and office complexes can also be included within this category.
  - **Social Service/ Governmental Centers:** Public agencies, government centers and community facilities attract some volume of traffic. While the nature and size of these facilities varies greatly, it can be generally stated that those serving at least 100 clients daily warrant public transit service.

#### 5.1.1 Directness of Route

This standard addresses the need for system coordination, coherence and accessibility. Complicated circuitous routes and inordinate trip travel times discourage transit use.

- Routes shall be designed to be as direct as possible and to provide maximum accessibility to transit.
- Deviations accommodating disabled persons shall account for ¼ of a mile from any point on the fixed route resulting in a 1.5 mile deviation. The additional travel time will vary due to the variability associated with boarding and securing disabled passengers.

## 6. Vehicle Assignment Targets

Equipment shall be assigned to specific routes and trips according to the following guidelines. These guidelines may be modified if operational and scheduling needs require:

- Small 25'- 39' Bus: Appropriate for lower volume Residential routes where ridership does not require a standard bus, or for routes where specific operating concerns preclude use of standard buses.
- Standard 40' Transit Bus: The standard equipment for University.

Prior to each sign up, a vehicle assignment guide is prepared for the upcoming period. Lower mileage vehicles are normally assigned to higher mileage blocks to equalize the mileage on vehicles of the same age. Also, prior to each sign up, the average vehicle age is calculated for all routes and the trips they operated. The average vehicle age for the minority routes is compared to the overall system to determine if a disparate impact exists.

## 7. On Time Performance

Published schedules must provide the GO bg transit's customers with a reasonable guarantee that the scheduled service will operate, and will operate on time. The dependability of GO bg transit is important to people who typically plan trips around the availability of bus service. Moreover, riders associate a time penalty with unreliable bus service that reduces the attractiveness of public transportation.

There are several ways to measure GO bg transit's dependability. The first is whether service operates at all. Measures of actual versus scheduled service are expressed as the percentage of scheduled trips and percentage of pullouts that are actually made. For GO bg transit the missed trip standard is 98 percent. Therefore, only two trips in 100 can be missed to still meet the standard. Since it is easier to recover from a service disruption at the garage than it is out in the field, an even more stringent standard of 99 percent is appropriate for missed pullouts. This permits one missed trip out of 100. The exception to this is Snow and Ice when Snow routes, or stoppages beyond the control of the transit interrupt service.

On-time performance is also examined in terms of schedule adherence, which means the difference between scheduled time and the time the bus actually passes a particular location. The schedule adherence standard consists of two parts: 1) the definition of on time, and 2) the proportion of buses that operate within the on-time range. For purposes of establishing GO bg transit's on-time performance, "on-time" is established at zero minutes early to 5 minutes late. This allows the bus reasonable latitude for encountering general delays, without unduly inconveniencing the waiting patron. For most persons, a wait of up to five additional minutes would not be regarded as excessive. Buses should never be early, for this would cause patrons to miss the bus entirely and subject many riders to an even longer wait for the next scheduled bus.

The standard for GO bg transit schedule adherence is established at 90% during peak service periods, and 95% during off-peak hours.

## 8. Distribution of Transit Amenities

GO bg transit maintains service standards for the distribution of various transit amenities, including: bus shelters, benches, bus schedules, route maps, and bike racks. The long-term objective is to provide a shelter at as many bus stops as possible. Priorities in the short and medium term should be given in proportion to the volume of usage by boarding passengers, especially schoolchildren, the elderly, passengers with disabilities and the degree of exposure to wind and driving rain.

Each of these amenities is described below. Stop level ridership analysis will be determined using a 100% survey of boardings and alightings. Ride check data can be used between surveys to determine if a stop needs to be upgraded to a shelter.

### 8.1 Bus Shelters

- The placement of shelters and the development of a priority location program will be based on the number of boarding and/or transferring passengers at a specific stop.
- Shelters shall be provided at all stops which serve 50 or more boarding and/or transferring passengers each day or which serve concentrations of elderly or persons that have a disability as funding permits.
- Service information including route numbers and schedules that serve the stop should be displayed.
- A bench will be provided with each shelter.
- Shelters will have bike parking where historically more than 20 passengers have been left behind in one year's time, due to limited bike capacity on the bus. These shelter placements will be developed as funding permits.

### 8.2 Benches

- Benches will be provided at all stops that serve 25 or more boarding and/or transferring passengers each day as funding permits.
- A pad will be provided where right of way is available as funding permits.

### 8.3 Bus Schedules and Route Maps

- Bus Schedules will be provided at all transit center facilities in the GO bg transit System
- Bus Schedules will be available on each transit vehicle
- Route Maps are displayed at all transit shelters

## 9. Transit Security

GO bg transit will provide transit security measures to protect employees and the public against any act or threat of violence or personal harm.

- Participation in the Transit Watch public awareness outreach campaign.
- Each transit vehicle will be equipped with on-board surveillance cameras as funding permits.
- All Transit Center facilities will be equipped with surveillance cameras as funding permits.
- Policies regarding review of surveillance video ensure that surveillance is conducted without regard to race, color, or national origin.

## GO bg transit Goals



- To Our Customers & Communities: We respect our customers. We treat everyone with dignity and respect their feelings.
- We conduct our business with strong ethical values. These values include honesty, respect, trust, responsibility, and fairness. We maintain the highest standard of ethics with our customers, employees, and community partners.
- We are committed to collaboration with our community partners and customers to enhance our ability to maximize our impact and resources. We recognize and accept our responsibility to the communities we serve.
- We work to strengthen families and other support systems. We make positive educational, social, and health interventions available so that families, individuals and children will succeed in school and life.

## GO bg transit Mission Statement



### THE MISSION

We team with **community partners** to provide human services with **dignity and respect**, empowering people in Southern Kentucky to achieve **stability and economic security**.

# CITY OF BOWLING GREEN LANGUAGE ACCESS PLAN

*Drafted April 2012*

*Revised March 2013*

*Approved April 2013*



# Table of Contents

<b>Background and Legal Purpose</b> .....	<b>3</b>
<b>Limited English Proficiency (LEP) Population Assessment and Four Factor Analysis</b> .....	<b>4</b>
<b>Number or Proportion of LEP individuals</b> .....	<b>4</b>
<b>Frequency of Contacts</b> .....	<b>4</b>
<b>Nature and Importance of the Program or Activity</b> .....	<b>5</b>
<b>Resources Available</b> .....	<b>5</b>
<b>Purpose of City’s Language Access Plan</b> .....	<b>7</b>
<b>Language Assistance Procedures</b> .....	<b>8</b>
<b>Identifying LEP individuals that need language assistance</b> .....	<b>8</b>
<b>Language Access Measures</b> .....	<b>9</b>
• Over-the-Phone Interpretation Procedures for: All Departments, except Bowling Green Police Department .....	<b>9</b>
• Over-the-Phone Interpretation Procedures for: Bowling Green Police Department .....	<b>10</b>
• Over-the-Phone Interpretation Procedures from Mobile Phones .....	<b>10</b>
• In-person Interpretation for City Staff in Public Contact Positions .....	<b>11</b>
• Face-to-Face Interpretation for City Staff when meeting with LEP Clients .....	<b>12</b>
<b>Translated copies of essential forms</b> .....	<b>13</b>
<b>Providing notice to LEP individuals of language assistance</b> .....	<b>14</b>
<b>Training staff on LEP policies and procedures</b> .....	<b>14</b>
<b>Monitoring Agency and Contracted offices for compliance</b> .....	<b>15</b>
<b>Outreach Measures</b> .....	<b>16</b>

## **Background and Legal Purpose**

The City of Bowling Green (“City”) is growing more diverse. Increasing numbers of those who live, work or spend time in the City are not proficient in English. The City must be capable of delivering services to all residents regardless of their English language ability in order to execute municipal functions effectively. Whether seeking to protect public safety, responding to emergencies or collecting revenues, poor communications between city employees and limited English proficient (LEP) residents will undermine the quality of services rendered. The ability to deliver services in different languages makes the city a more hospitable location for newcomers to settle, promotes the development of small businesses and facilitates sound emergency management planning.

This document serves as the plan for the City of Bowling Green to provide a framework for the provision of timely and effective language assistance to City services for persons with limited English proficiency (LEP). It is designed to respond to Title VI of the Civil Rights Act of 1964 Section 601 which provides that no person shall “on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

The Supreme Court, in *Lau v. Nichols*, 414 U.S. 563 (1974), stated that a recipient’s failure to ensure meaningful opportunity to national origin minority, limited-English proficient persons to participate in the federally funded program violates Title VI and Title VI regulations because such conduct constitutes national-origin discrimination.

On August 11, 2000, President Clinton signed Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency.” The Executive Order requires federal agencies to examine the services they provide, identify any need for services to those with Limited English Proficiency (LEP), and develop and implement a system to provide those services so LEP persons can have meaningful access to them.

## **Vision Statement**

The City of Bowling Green will be a leader in customer service to all people who live, work and play here; specifically it will be a pace-setter among organizations seeking to eliminate language as a barrier and obstacle to its residents’ and visitors’ enjoyment of the full scope of its municipal services. We will seek to achieve levels of service which are fully compliant with Title VI and Executive Order 13166 and which set a high, consistent standard across departments that meets or exceeds the expectations of its residents, partners and peers.

# Limited English Proficiency (LEP) Population Assessment and Four Factor Analysis:

## 1. Number or Proportion of LEP individuals

Language Data has been compiled through the 2010 U.S. Census Bureau, Warren County Public School System, Bowling Green City Independent Schools, Western Kentucky Refugee Mutual Assistance Association (WKRMAA/Bowling Green International Center); and the most recent records provided by “In Every Language” of over the phone interpretation services.

According to the 2010 U.S. Census Bureau, approximately 10.9% of the total population in Bowling Green is foreign-born, and consequently 13.5% of residents in Bowling Green over the age of five (5) speak a language other than English at home. Likewise, about 3,774 or 6.5% of the total population of the City of Bowling is of Hispanic or Latino origin, and 3,149 of these residents speak Spanish. From this subgroup, 1,005 speak English “very well,” and 2,144 speak English less than “very well.” Likewise, approximately 3,984 residents speak other languages – 2,019 speak English “very well,” and 1,965 speak English “less than very well.”

There are currently over 30 countries and 49 different languages and dialects spoken by students within the Warren County Public School System, data compiled in 2013 found that 9% of the total numbers of students are English Learners (EL). The most prevalent languages at the present time are Spanish, Burmese, Karen, Karenni, Arabic, Bosnian and Swahili. The Bowling Green Independent School District also reports that 14% of their total student populations are English Learners (EL), with approximately 34 languages and dialects spoken within its schools. Bowling Green Police Department (BYPD) and Neighborhood and Community Services Department (NCS) records for “In Every Language” over the phone interpretation services’ indicate that, over the months of July 2012 through February 2013, the languages most frequently used were Spanish, Swahili, Arabic, Bosnian, and Burmese in order of relevance. There were 19 languages documented for over the phone interpreter use in a nine-month period.

## 2. Frequency of Contacts

Currently there is no uniform language data collection method used by all City Departments. Individual departments may collect data through intake forms and over the phone interpretation services. The Bowling Green Police Department (BYPD) currently utilizes “In Every Language,” a phone interpretation service based in Louisville, Kentucky, which serves as the most accurate record to date that reflects the frequency of contacts with limited English proficient (LEP) individuals. Data collected in 2010 shows a total of 345 uses of over the phone interpreter services, a 68.69% increase since 2009. Likewise, data available from the Bowling Green Police Department for over the phone interpretation services for fiscal year 2012 shows a total of 3,325 minutes of interpreting services. Neighborhood and Community Services (NCS) adopted “In Every Language” and launched this service throughout all City Departments in May 2012, and since its inception records indicate there have been 477 minutes of interpreting services provided.

Because language data is not consistently documented across all City Departments, it is difficult to assess the frequency of contacts by LEP individuals to City Services. While the frequency of contacts by LEP individuals in the past has been few, the City of Bowling Green believes that the frequency of contacts can increase when outreach services are made available to these eligible population groups.

### 3. Nature and Importance of the Program or Activity

The services provided by the City of Bowling Green are varied and diverse, ranging from emergency services to parks and recreation services. The Bowling Green Police Department and the Bowling Green Fire Department provide services that are of an emergency nature. Because access to emergency services is crucial for all residents, the Bowling Green Police Department, whose dispatch center also processes incoming emergency contacts for the Bowling Green Fire Department, already has a language access plan in place. Access to other city services may not be considered emergency in nature, nevertheless, ensuring equal access by all residents promotes the development of an inclusive community.

### 4. Resources Available

The City of Bowling Green recognizes the growing diversity of its citizens and strives to offer, whenever practicable, and provide the same high quality of service to all citizens, regardless of their language and communication abilities. This is a list of all available resources prior to the Language Access Plan implementation:

#### A. Language Access:

1. **Language Access Plans (LAP)**- There have been three separate Language Access Plans already available – The Bowling Green Police Department’s LAP, The Bowling Green Housing and Community Development Housing Choice Voucher Program LAP, and the Transit System LAP. The Bowling Green Police Department’s LAP has been the most recent working plan and only plan actively implemented by the Department.
2. **Bilingual Staff** - There are a few city employees who are bilingual and multicultural in different departments:
  - a. **Bosnian/Serbo-Croatian** – Elvira Ramic (Neighborhood and Community Services) 393-3294, Gordana Hasanagic (Neighborhood and Community Services).
  - b. **German** – Paul Correa (Parks and Recreation) – 393-3574.
  - c. **Italian** – Kevin DeFebbo (City Manager), 393-3643.
  - d. **Spanish** - Connie Villagrana (Public Works) 393-3589, and Leyda Becker (Neighborhood and Community Services) 393-3766.
  - e. **Vietnamese** – Anh Nguyen (Finance) 393-353.
3. **“In Every Language” Line** – “In Every Language” currently offers telephonic interpreting in **170 different languages**. A toll-free, 24 hours a day, 365 days a year access. This language line charges \$1.50 per minute regardless of language.
4. **Interpretation Services** – A list of face-to-face interpreters was compiled by the Bowling Green Police Department, but it is not up-to-date.

#### B. Translated copies of essential forms -

There are several informational brochures and forms that have already been translated, primarily for use by the Bowling Green Police Department. Translated Materials include:

- a. **Information for Victims of Crime Brochure** – available in English, Spanish, and Burmese (electronic form available).
- b. **Traffic Laws Brochures** – available in English, Spanish, and Burmese (electronic form available).

- c. **Keeping Your Children Safe Brochures** – available in English, Spanish, Burmese, Swahili, and Arabic (electronic form available).
- d. **Bowling Green Police Department International Communities Liaison Brochures** – available in Spanish and Burmese (electronic form available).
- e. **In Case of Emergency Brochures** – available in English, Spanish, Arabic, and Swahili (electronic form available).
- f. **International Driver’s License Scam Notice** – available in English, Spanish, and Burmese (electronic form available).
- g. **Miranda Rights Form** – available in English and Spanish (electronic form available).
- h. **Consent to Search Form** – available in English and Spanish (electronic form available).
- i. **Welcome to the Neighborhood Brochure** - available in Spanish and Bosnian (few copies available in print, no electronic copy available).
- j. **Athletic Program Roster/Waiver Form** – available in English, Spanish, and Bosnian (electronic form available).
- k. **City of Bowling Green Website** – can be translated into Spanish and Bosnian by clicking on a small link on the top right hand corner of the website. All information on the site is translated, although the translation is not very accurate. The forms that are translated, their translated text are not formatted back into the original form. Not all forms are translated by Google.

## Purpose of City's Language Access Plan

The purpose of this plan is to establish and provide greater access and participation in public services, programs and activities for residents of the City of Bowling Green with limited or no-English proficiency. “Access and participate” means to be informed of, participate in, and benefit from public services, programs, and activities offered by the City of Bowling Green at a level equal to English proficient individuals.

Following these guidelines is essential to the success of our mission to: “strengthen our vibrant community by focusing on quality of life, service delivery, fiscal responsibility, public safety, neighborhood revitalization, visionary leadership, and economic development.

## Definitions

1. **Limited English Proficiency (LEP).** Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English can be limited English proficient, or "LEP." These individuals may be entitled language assistance with respect to a particular type or service, benefit, or encounter.
2. **Bilingual Staff.** People who are completely bilingual are fluent in two languages. They are able to conduct the business of the workplace in either of those languages. Bilingual staff can assist in meeting the Title VI and Executive Order 13166 requirement for federally conducted and federally assisted programs and activities to ensure meaningful access to LEP persons.

3. **Interpretation vs. Translation.** Interpretation involves the immediate communication of meaning from one language (the source language) into another (the target language). An interpreter conveys meaning orally, while a translator conveys meaning from written text to written text. As a result, interpretation requires skills different from those needed for translation.

## Language Assistance Procedures

### 1. Identifying LEP individuals that need language assistance

The City of Bowling Green will have in place mechanisms to assess, on a regular and consistent basis, the language assistance needs of current and potential residents who access city services and the city's capacity to meet the needs according to the elements of this plan.

The following procedures will be adopted to identify the language needs of LEP individuals seeking city services:

- a. All current staff and personnel in a public contact position (PCP) will use language identification cards, or "I speak cards" which invite LEP individuals to identify their language need.
- b. If an LEP individual is unable to identify his/her primary language spoken, the (PCP) staff will call "In Every Language" language line at **1-866-908-6156** and request an interpreter. "In Every Language" staff will assist in identifying the individual's language.
- c. Notices will be posted at public entrances notifying LEP individuals of language assistance and the right to obtain free interpretation services if needed. This will encourage LEP individuals to identify themselves.
- d. Language fields will be added to all forms and documents, paper or electronic, available for the public to complete in order to access city services. Staff will be able to identify the preferred language use on form and seek appropriate interpretation services.

### 2. Language Access Measures

There are several means by which city staff can provide language access to residents who are Limited English Proficient (LEP), whether the need is over the phone interpretation or face-to-face interpretation. Refer to the procedures below that best apply to your position:

✓ **Over-the-Phone Interpretation Procedures for all City Departments, except Bowling Green Police Department:**

1. If caller is speaking another language, the "In Every Language" language line shall be accessed immediately. If the caller speaks limited English, notify them of their right to an interpreter. If there is difficulty communicating, the language line shall be accessed.
2. Ask the caller what language they speak:

- **In Spanish:** *¿Habla Usted Español?* This means: “Do you speak Spanish?”
  - If the answer is: *Si* = Yes
  - Ask the caller to please hold – **In Spanish:** *Un momento, por favor. No cuelgue (kwel – geh).* This means: “One moment, please. Do not hang up.”
  - If the caller does not speak Spanish, “In Every Language” language line will help in determining the caller’s language.
3. To access the “In Every Language” Interpretation Services you must have a three way conference call. To add on a third party:

- From a connected call  (not on hold), press the **Conference**  button
- Make a new call to “In Every Language” at:

**DIAL: 1-866-908-6156**

- You will be connected to a live operator
- Give the operator your code: **2459 (BGKY)**
- Give the operator your name, phone number, employee ID number, department number, and language you require
- Your account name is **City of Bowling Green**
- You will be connected to an interpreter
- Press the **Conference** button again. The conference begins and the phone displays “Conference” instead of caller ID.



- Repeat these steps to add more participants.

4. Continue with the call as usual, offering services and making appropriate referrals. Be mindful of working with an interpreter over-the-phone and follow the tips provided during training on how to effectively work with interpreters. The conference ends when all participants hang up.

✓ **“Conference in” a held call**

1. From a connected call  (not on hold), press the Conference button 
2. Press the pulsing green line button  for the held call that you want to add. Or, if the held call is on another line, press the Active Calls softkey, choose a call from the list, and press the Conference button.
3. The conference ends when all participants hang up.

✓ **Over-the-phone Interpretation Procedures for the Bowling Green Police Department:**

1. If caller is speaking another language, the “In Every Language” language line shall be accessed immediately. If the caller speaks limited English, notify them of their right to an interpreter. If there is difficulty communicating, the language line shall be accessed.
2. To access the “In Every Language” Interpretation Services you must contact Police dispatch at 393-3537 or 393-4580, a dispatcher will assist you in connecting to this service.
3. Refer to the Bowling Green Police Department’s Language Access Plan for other Departmental policies and procedures.

✓ **Over-the-Phone Interpretation Procedures from Mobile Phones** – The “In Every Language” over-the-phone interpretation service can be accessed from any phone. If you are on the field and require this service to communicate with an LEP resident face-to-face follow these procedures:

1. If resident is speaking another language, the “In Every Language” language line shall be accessed immediately. If the resident speaks limited English, notify them of their right to an interpreter. If there is difficulty communicating, the language line shall be accessed.
2. Ask the resident what language they speak:
  - **In Spanish:** *¿Habla Usted Español?* This means: “Do you speak Spanish?”
  - If the answer is: *Si = Yes*
  - Ask the resident to please wait – **In Spanish:** *Un momento, por favor.* This means: “One moment, please.”
3. If the resident does not speak Spanish, show them the “In Every Language” Language Identification Brochure or “I Speak Card;” show him/her the portion of the card for the area of the world you believe he/she comes from. This will help you determine what language you need.
4. To access the “In Every Language” Interpretation Services you must:

**DIAL: 1-866-908-6156**

- You will be connected to a live operator
  - Give the operator your code: **2459 (BGKY)**
  - Give the operator your name, phone number, employee ID number, department number, and language you require
  - Your account name is **City of Bowling Green**
  - You will be connected to an interpreter
5. Inform the interpreter that you are face-to-face with an LEP resident and are using a mobile phone and you will need to put the interpreter on Speaker phone in order for all three individuals to communicate.

6. Communicate with resident as usual, offering services and making appropriate referrals. Be mindful of working with an interpreter over-the-phone and follow the tips provided during training on how to effectively work with interpreters.
  - ✓ **In-person Interpretation for City Staff in Public Contact Positions** – If your position deals with the public, please follow these procedures when helping an LEP resident in person:
    1. If the resident speaks limited English, notify them of their right to an interpreter by pointing to the public notice or “I Speak cards” that specify this information.
    2. Ask the resident what language they speak:
      - **In Spanish:** *¿Habla Usted Español?* This means: “Do you speak Spanish.”
      - If the answer is: *Si* = Yes
      - Ask the resident to please wait – **In Spanish:** *Un momento, por favor.*
      - Call Leyda Becker at #3766 and if available, will come to help interpret for the resident face-to-face.
    3. If the resident does not speak Spanish and/or Leyda Becker is not available to interpret face-to-face show them the “In Every Language” Language Identification Brochure or “I Speak Card;” show him/her the portion of the card for the area of the world you believe he/she comes from. This will help you determine what language you need.
    4. City Staff will never require a family member or friend to be used as an interpreter unless the applicant/customer requests such assistance from their family member or friend.
    5. To access the “In Every Language” Interpretation Services you must:
      - DIAL: 1-866-908-6156**
      - You will be connected to a live operator
      - Give the operator your code: **2459 (BGKY)**
      - Give the operator your name, phone number, employee ID number, department number, and language you require
      - Your account name is **City of Bowling Green**
      - You will be connected to an interpreter
    6. If available, use a dual handset phone, use one handset for yourself and provide the other phone handset to the LEP resident. Inform the interpreter that you are face-to-face with an LEP resident and they are on the line with you.
    7. ✓ Communicate with resident as usual, offering services and making appropriate referrals. Be mindful of working with an interpreter over-the-phone and follow the tips provided during training on how to effectively work with interpreters.

- ✓ **Face-to-Face Interpretation for City Staff when meeting with LEP Clients** - When scheduling meetings, public information forums, etc. where LEP clients may be present, staff should schedule for an in-person interpreter to be available for the LEP client. Follow these procedures to schedule an interpreter:
  - a. **Spanish Language Interpreter** – If it has been identified that the LEP Client needing language access speaks Spanish, contact Leyda Becker, International Communities Liaison, at leyda.becker@bgky.org or at #3766 to interpret for you.
  - b. **Interpreters for Other Languages** –
    - Contact Leyda Becker, International Communities Liaison, at leyda.becker@bgky.org or at #3766. Leyda can assist any department in contracting an interpreter or can supply the staff member with an updated language resource list to access available resources.
    - Contact any City Staff who is part of the “Language Access Task Force,” and this staff can also help facilitate the process of contracting an interpreter.
    - Place a service request for an interpreter at least 5 days in advance if possible. Although this may not be possible in a number of settings, allow adequate time for contracting agency to reach a face-to-face interpreter.

#### 4. **Translated copies of essential forms**

- a. The City of Bowling Green will coordinate the translations of vital documents into the top citywide LEP Languages.
- b. The extent of the city’s obligation to provide written translations of documents should be determined by the International Communities Liaison and each City department on a case-by-case basis, looking at the totality of the circumstances in light of the four factor analysis and provide for their translation into the language of each frequently-encountered LEP group eligible to be served and/or likely affected by the city’s program is necessary. Such written materials to be translated could include:
  - Applications to participate in a program or activity or to receive benefits or services
  - Consent and complaint forms
  - Intake forms with the potential for important consequences
  - Written notices of rights, denial, loss, or decreases in benefits or services
  - Notices advising LEP persons of free language assistance
  - Outreach materials published by City Departments that inform individuals about their rights or eligibility requirements for benefits and participation

- o Hard Copies of the above translated documents will be made available upon request or via the city's website.
- c. The city will incorporate plain language guidelines and standards into all translated materials so that documents are easy-to-read.
- d. The International Communities Liaison will work with the Information Technology Department to develop an online language access policy pertaining to websites which each department intends to follow where practicable. A copy of the city's Language Access Plan and all translated essential documents will be posted online.

#### **4. Providing notice to LEP individuals of language assistance**

The Limited English Proficiency Plan also takes into account physical signage and spatial considerations so that interactions between City Staff and LEP patrons can take place in a cordial and appropriate manner.

- a. Each Department shall take appropriate steps to inform all patrons, applicants, recipients, community organizations, and other interested persons, including those whose primary language is other than English, of the provisions of this plan. Such notification shall also identify the name, office telephone number, and office address of the employee(s) responsible for compliance with this plan.
- b. Each department shall post and maintain signs in regularly encountered languages other than English in waiting rooms, reception areas and other initial points of entries. These signs must inform patrons, applicants and beneficiaries of their right to free language assistance services and invite them to identify themselves as persons needing such services.

#### **5. Training staff on LEP policies and procedures**

- a. The International Communities Liaison will provide a one-time orientation on the city's language access plan, policies and procedures to all current staff in public contact positions (PCP). This orientation will include training on how to identify a customer's primary language, training on "In Every Language" over the phone interpretation service, and how to professionally interact with individuals who are Limited English Proficient.
- b. The Language Access Plan will be provided at the orientation and will also be posted on the city's International Communities Liaison webpage and will be made available to all employees through the Click.
- c. Training assistance can be provided by "In Every Language" over the phone interpretation service to city staff that will be using their service, and will also provide tools and documents to guide employees whenever applicable.

- d. Information on the City's language access policies and procedures will also be provided to new employees in public contact positions as part of their new hire orientation. Such new employees will also receive a copy of the city's Language Access Plan.
- e. The International Communities Liaison will work with managerial and supervisory staff, even if they do not interact regularly with LEP persons, to integrate the city's Language Access Plan into every city department in order to reinforce its importance and ensure its implementation by staff.
- f. The International Communities Liaison will work with the City's Human Resources Department to incorporate cultural competency training as part of the agencies EEO training curriculum.
- g. The International Communities Liaison will oversee the development of the necessary internal documents and materials to inform city staff of language access programs, policies and procedures.

## **6. Monitoring Agency and Contracted offices for compliance**

- a. A city employee Language Access Taskforce will be created to assist the International Communities Liaison in monitoring and implementing the language access plan. This taskforce will be composed of city staff and personnel who are key stakeholders to the success of the plan's implementation and appointed by Senior Management in each department.
- b. The Language Access Taskforce will convene on a quarterly basis. The taskforce will make the following assessments in considering changes and improvements to the plan:
  - o Reports indicating the number of requests for interpretation received and what languages were requested will be compiled by the taskforce.
  - o A determination of whether existing assistance is meeting the needs of residents with Limited English Proficiency. For example, were they able to assist the patron in getting the document they requested, did they refer them to correct agency if we were unable to assist them.
  - o An assessment of whether staff members understand the city's Language Access Plan, its policies and procedures and how to implement them.
  - o Available Language Resources and a determination of their effectiveness in providing language assistance.
- c. The International Communities Liaison will establish an International Communities Advisory Council to provide advisement regarding the needs of immigrant and international residents

in Bowling Green. Changes and improvements will be made to the Language Access Plan based on recommendations made by the International Communities Advisory Council and the Language Access Taskforce.

## **7. Outreach Measures**

The International Communities Liaison will develop a plan to conduct outreach to communities with limited or no-English proficient populations about the City of Bowling Green's language access plans and about the benefits and services to be offered under the Language Access Plan. Methods of outreach may include the following:

- Organize events in LEP communities (e.g. fairs, community meetings, forums, educational workshops, etc.);
- Disseminate information through LEP media outlets when applicable (e.g. local TV, newspapers, and radio);
- Partner with Community-based organizations to implement a project and/or deliver a service;
- Distribute flyers, brochures, and other printed material;
- Disseminate information through the city's website;
- Issue press releases;
- Run a topic-specific campaign to raise awareness of a particular service or project in an LEP community;
- Sponsor educational, informational, cultural and/or social events in LEP communities;
- Participate in LEP community events and/or meetings;
- Invite LEP community to visit city service site(s) and government facilities;
- Cosponsor community events with Community-based organizations and other LEP organizations;
- Organize regular needs assessment meetings with LEP Community-based organizations.