



TITLE VI PROGRAM

March 2014

Jet Transit Terminal



JETS Multi-Modal Central Transfer Facility

To Be Completed Late 2015

Table of Contents

JETS Title VI Notice to the Public	2
JETS Title VI Complaint Procedures	3-4
JETS Title VI Complaint Form	5-6
List of Transit-Related Title VI Investigations, Complaints, and Lawsuits	7
Title VI Public Participation Plan	8-10
Title VI Language Assistance Plan	11-19
Factor 1: The number and proportion of LEP persons served or encountered in the eligible service population	11-15
Factor 2: The frequency with which LEP individuals come into contact with the program, activity, or service	15-16
Factor 3: The importance to LEP persons of JETS program, activity, or services	16-18
Factor 4: The resources available to the recipient and costs	18-19
Table Depicting Membership of Non-Elected Board Broken Down by Race	20
JETS Title VI Monitoring of Sub-Recipients	21
JETS Title VI Equity Analysis	22
Copy of Jonesboro City Council Resolution Approving 2014 JETs Title VI Policy	23
JETS Title VI Service Standards	24-25
JETS Title VI Service Policies	26
APPENDICES	27-30
APPENDIX 1	28
APPENDIX 2 (a)	29
APPENDIX 2 (b)	30



Notifying the Public of Rights Under Title VI

The City of Jonesboro

- The City of Jonesboro operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes that she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the City of Jonesboro.
- For more information on the City of Jonesboro's civil rights program, and the procedures to file a complaint, contact (870) 933-4640; email groark@jonesboro.org; or visit the City of Jonesboro Human Resources Department located in the Jonesboro Municipal Center, 300 South Church, Jonesboro, AR 72401. For more information, please visit <http://www.jonesboro.org/Humres/HR.html>
- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590
- If information is needed in another language, contact (870) 933-4640



The Jonesboro Economical Transit System
P.O. Box 1845, Jonesboro, AR 72404-1845
2630 Lacy Drive
870-935-5387 (Voice)/870-933-5649 (Fax)

JETS Title VI Complaint Procedures

This section outlines the Title VI complaint procedures related to providing programs, services, and benefits. However, it does not deny the complainant the right to file formal complaints with the City of Jonesboro, Equal Employment Opportunity Commission, or the Federal Transit Administration, or to seek private counsel for complaints alleging discrimination, intimidation or retaliation of any kind that is prohibited by law.

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs receiving federal financial assistance.

GENERAL

Any person who believes that he or she, individually, or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color, or national origin as noted below may file a written complaint with the City of Jonesboro, Transit Department, P.O. Box 1845, 2630 Lacy Drive, Jonesboro, AR 72403. Complainants have the right to complain directly to the appropriate Federal agency. Every effort will be made to obtain early resolution of complaints. The option of informal meeting(s) between the affected parties and the Transit Director and the Human Resources Director may be utilized for resolutions.

PROCEDURE

1. The complaint must meet the following requirements:
 - a. The Complaint shall be in writing and signed by the complainant(s). In cases where complainant is incapable of providing a written statement, a verbal complaint may be made. The Transit Director will interview the complainant and assist the person in converting verbal complainants to writing. All complaints must, however, be signed by the complainant or his/her representative.
 - b. The Complaint must include the date of the alleged act of discrimination, date when the complainants became aware of the alleged act of discrimination, or the date on which that conduct was discontinued or the latest instance of conduct.
 - c. The Complaint must present a detailed description of the issues, including names and job titles of those individuals perceived as parties to the complaint.
 - d. Federal law requires complaints to be filed within 180 calendar days of the alleged incident.

(Continued on reverse side)

2. A complaint must meet the following criteria for acceptance:
 - a. The complaint must be filed within 180 calendar days of the alleged occurrence.
 - b. The allegation must involve a covered basis such as race, color, or national origin.
 - c. The allegation must involve a JETS service of a Federal aid recipient, sub-recipient, or contractor.
3. A complaint may be dismissed for the following reasons:
 - a. The complainant requests the withdrawal of the complaint.
 - b. The complainant fails to respond to repeated requests for additional information needed to process the complaint.
 - c. The complainant cannot be located after reasonable attempts.
4. Upon receipt of a properly filed complaint, the Transit Director will forward the complaint to the Human Resource Department for the investigation of its merits. The Transit Director will also collect data pertinent to circumstances of the allegations.
5. Once JETS and the COJ Human Resources Department decide to accept the complaint for investigation, the complainant will be notified in writing of such determination.
6. In cases where JETS and the COJ Human Resources Department assumes the investigation of the complaint, within 90 calendar days of the acceptance of the complaint, an investigative report will be developed by JETS Transit Director and COJ Human Resources Director. This report shall include a narrative description of the incident, identification of persons interviewed, a determination developed from the factual findings, and recommendations for disposition. In the event JETS is in non-compliance with Title VI regulations, remedial actions will be listed.
7. The investigative report and the determination will be presented for review to the Mayor of Jonesboro and, in some instances, to the Jonesboro City Attorney. These two officials will have the authority to modify these documents as they may deem necessary.
8. Notice of the investigative report developed by the Transit Director and the Human Resources Director, and reviewed by the Mayor, will be mailed to the complainant. This notice shall also include information regarding appeal rights of the complainant and instructions for initiating such an appeal. Notice of appeals are as follows:
 - a. JETS will reconsider the findings in the investigative report if new facts come to light.
 - b. If complainant is dissatisfied with the findings in the investigative report set forth by, the same complaint may be submitted to FTA for investigation. Complainant will be advised to contact the Federal Transit Administration, Office of Civil Rights, 819 Taylor Street, Room 8A36, Fort Worth, TX 76102, or by telephone at (817) 978-0558.
9. A copy of the original complaint, JETS investigative report, and the Final Remedial Action Plan, if appropriate, will be issued within 120 days of the receipt of the complaint.
10. A summary of the complaint and its resolution will be included as part of the Title VI updates to the FTA by JETS.

JETS Title VI Complaint Form

Section I:

Name: _____

Address: _____

Telephone (Home): _____

Telephone (Work): _____

Electronic Mail Address: _____

Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	

Section II:

Are you filing this complaint on your own behalf?

Yes*

No

* If you answered "yes" to this question, go to Section III

If not, please supply the name and relationship of the person for whom you are complaining: _____

Please explain why you have filed for a third party: _____

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.

Yes

No

Section III:

I believe the discrimination I experienced was based on (check all that apply):

Race

Color

National Origin

Date of Alleged Discrimination (Month, Day, Year): _____

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.

Section IV:

Have you previously filed a Title VI complaint with this agency?	Yes	No
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Section V:

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?

If yes, check all that apply:

Federal Agency: _____

Federal Court: _____

State Court: _____

State Agency: _____

Local Agency: _____

Please provide information about a contact person at the agency/court where the complaint was filed.

Name: _____

Title: _____

Agency: _____

Address: _____

Telephone: _____

Section V:

Name of agency complaint is against: _____

Contact person: _____

Title: _____

Telephone number: _____

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date required below

Signature

Date

Please submit this form in person at the address below, or mail this form to:
City of Jonesboro Title VI Coordinator
P.O. Box 1845
Jonesboro, AR 72403

JETS Title VI List of Investigations, Lawsuits, and Complaints

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Actions Taken
Investigations	Not Applicable	Not Applicable	Not Applicable	Not Applicable
1.				
2.				
Lawsuits				
1. Charles H. Simmons, Plaintiff, vs. City of Jonesboro, Arkansas and Harold Perrin and Steve Ewart in their official and individual capacities, Defendants. No. 3:10-CV-00226 SWW	Filed September 20, 2010	The complaint was that during the employment of Charles H. Simmons. An African-American, with the City of Jonesboro that he was subjected to discriminatory treatment and harrassment on account of his race by Steve Ewart, JETS Transit Director, and Michael Black, JETS Transit Supervisor, both of whom were Caucasian	Stipulation of Voluntary Dismissal Without Prejudice	None
2.				
Complaints	Not Applicable	Not Applicable	Not Applicable	Not Applicable
1.				
2.				

Jonesboro Economical Transportation System (JETS) Public Participation Plan (PPP)

Goals and Objectives for the Public Participation Plan

The objective of Jonesboro Economical Transportation System (JETS) Public Participation Plan (PPP) is to offer real opportunities for all citizens of Jonesboro to participate in the development of their public transit system. JETS is committed to proactively involving the public in identifying and addressing public transportation issues. JETS will make all reasonable efforts to foster improved two-way communication and trust between all citizens of Jonesboro and the JETS organization.

Public contributions to public transportation planning are integral to the development of a viable transportation system. JETS Public Participation Plan is designed to effectively stimulate a broad base of public involvement and to develop a wide range of public perspectives to be considered.

Goals established by JETS for reaching its objective of offering real opportunities for all citizens of Jonesboro to participate in the development of their public transit system are as follows:

Determine what non-English languages and other cultural barriers exist to public participation within the City of Jonesboro.

Provide a general notification of meetings, particularly forums for public input, in a manner that is understandable to the various populations within the City of Jonesboro.

Hold meetings in locations which are accessible and reasonably welcoming to all area residents, including, but not being limited to, low-income and minority members of the community.

Provide effective means to obtain significant information from those segments of the community who are unlikely to attend public meetings.

Provide a framework of diverse actions appropriate to a variety of plans and programs, as well as for potential alternatives to these plans and programs.

Employ a variety of media to convey the information presented, including but not limited to charts, graphs, photos, maps and the Internet.

Determine the particular stakeholders that will be potentially affected by the transportation planning that is to be considered at a specific public meeting and make appropriately targeted efforts to engage their participation.

Scope of JETS Public Participation Program

The purpose of a Public Participation Plan is to establish procedures that allow for, encourage, and monitor participation of all citizens, including, but not limited to, low income, minority individuals, and those with limited English proficiency, in the public transit planning process. In that traditional means of soliciting public involvement may not reach the diverse community that is Jonesboro, or might not allow for meaningful avenues of input for them, JETS is committed to taking reasonable actions throughout its planning process to provide opportunities for historically under-served populations to participate.

An important portion of JETS public transportation planning process is performed in conjunction with the transportation planning process of the Jonesboro Metropolitan Planning Organization's (MPO). In that JETS is a very small and relatively young public transit system, much of its planning continues to be done within the MPO, the same structure that helped bring it into existence. Moreover, JETS Transit Director is a member of the Jonesboro MPO's Technical Committee and the Chair of JETS Community Advisory Board serves on the MPO's Policy Committee. Thus, JETS is an active participant in all Jonesboro MPO activities. The latest edition of the Jonesboro Metropolitan Planning Organization's Public Participation Plan is located on its website, <http://www.jonesboro.org/MPO/mpo.htm>. At this Website is also found the latest version of the Jonesboro MPO's Transportation Improvement Plan. JETS was integrally involved in the creation of this plan and actively participated in the public hearings surrounding its adoption.

JETS also actively participates each year in the public meetings held early each year in each of Jonesboro's six aldermanic wards. Sponsored by the Mayor of the City of Jonesboro, these generally well-attended meetings attract a good representation of the diverse demographics of each of these City Council election districts.

One noticeably absent "community" from these annual ward meetings is Jonesboro's Hispanics. Accordingly, JETS intentionally maintains a strong relationship with Hispanic Community Services, Inc. (HCSI), a regional non-profit headquartered in Jonesboro that exists to assist in the integration of the Hispanic community into the larger whole. JETS provides HCSI information about its planning activities that HCSI periodically distributes to Hispanics. JETS also cooperates with HCSI activities throughout the year, such as by participating in the annual Hispanic Celebration in May.

Furthermore, JETS has advertising panels that it periodically displays in the rear of its buses that proclaim in Spanish, "JETS is friendly to Hispanics". The translation for these panels was done by HCSI. HCSI also offers to JETS its services when JETS needs transit materials translated from English to Spanish or in the event that a predominantly Spanish speaking rider needs to communicate directly with JETS' management.

JETS also maintained connection with the local Hispanic community through advertising in the Spanish-language newspaper *El Hispano* until it ceased publication. *El Hispano* would also, from time to time, include general news stories about JETS and its services.

Another major focus for JETS over the past five years has been developing its service to the Arkansas State University (A-State) campus. While comprehensive public transit service for the students, faculty, and staff has been JETS foremost consideration, we have also given much attention to providing a more robust transit service for the growing international student body at A-State. Over the past five years, the University has increased its international student enrollment to where it is more than 7% of the student body. Although most of these "internationals" are from Asia and the Middle East, there are also European and African students as a part of this cohort. Most of these international students come from countries that have well-developed public transit systems in even the most modest-size cities.

In that these are university students who studies are conducted in English, there is much emphasis for them to be "immersed" in the American culture. While JETS understands and supports this academic goal we also are committed to ensuring that A-State's Internationals can access JETS transit services without language being a barrier. A-State's Office of International Programs has agreed to cooperate with JETS in providing language support if and when needed.

JETS also works to establish public participation through the activity of JETS Community Advisory Board (CAB). Information about the JETS CAB can be found on JETS website (www.ridejets.com) and its regular monthly meetings are reported in the Jonesboro Sun, the daily newspaper for Northeast Arkansas. JETS CAB meetings also attract regular coverage from KASU (regional public radio), as well as periodic coverage on KAIT, the television station who coverage area includes all of Northeast Arkansas. The Arkansas State University's student run newspaper, The Herald, also covers JETS CAB meetings from time to time.

JETS frequently provides Public Service Announcements (PSAs) to these media outlets, and information pertaining to JETS transportation planning activities is definitely included in these releases. Moreover, in accordance with FTA and City of Jonesboro regulations, JETS does formally advertise all public hearings that it holds in the Jonesboro Sun.

JETS also makes limited use of recently developed technologies to disseminate information about and to encourage participation in its planning activities. Notices of planning meetings are posted on JETS website. Email notices publicizing these events are also sent to a diverse group of local organizations. The following agencies are emailed information about upcoming JETS public planning meetings, along with a request for the addressee to provide the attached information to their clientele.

Abilities Unlimited, Incorporated
Crowleys Ridge Development Council
David Puryear Center
East Arkansas Area Agency on Aging
East Arkansas Planning and Development District Focus, Incorporated
Hispanic Community Services Incorporated
Jonesboro Urban Renewal and Housing Authority
Jonesboro Regional Public Library
Mid-South Health Systems
St. Bernards Senior Centers
The Learning Center
The Mall at Turtle Creek
Wesley on the Ridge
Valley View Adult Education Center

Moreover, as a part of a major website upgrade for the City of Jonesboro, before the end of 2014, JETS will be able to communicate with the public via online social media.

Also available on JETS website is contact information for JETS management. It is not infrequent for JETS officials to receive emails on after hours/on weekends and during holidays from citizens needing information about JETS services. Such requests are responded to in a timely manner and quite often the requests for information are fully complied with before JETS' offices re-open.



JETS Language Assistance Plan

Improving Access for People with Limited English Proficiency Four Factor Analysis

The Jonesboro Economical Transportation System (JETS), a department of the City of Jonesboro, Arkansas, has conducted the following analysis under Title VI of the Civil Rights Act of 1964, which seeks to improve access to services for persons with Limited English Proficiency (LEP). The purpose is to ensure that no person on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving Federal financial assistance from the Federal Transit Administration (FTA).

JETS has conducted the following analysis using the four factors identified in the Department of Transportation (DOT) LEP guidance:

Factor 1: The number and proportion of LEP persons served or encountered in the eligible service population

Task 1, Step 1: Examine prior experience with LEP individuals.

Current data indicates that approximately 2.6% of Jonesboro's population speaks a language at home other than English (**S1601 LANGUAGE SPOKEN AT HOME**). At 1.5%, the most common non-English language spoken in homes in Spanish. With LEP populations as low as these numbers indicate, JETS staff have only infrequent contact with this segment of our population.

Although Spanish-speaking individuals and families have increasingly located in Jonesboro over the past decade, this demographic is still not as sizeable as in Central and Western parts of Arkansas or other parts of the South in general. Due to the relatively small percentage of the Jonesboro population being Hispanic and the tendency of many Hispanic workers to "car-pool" to a common worksite, JETS drivers and dispatchers very seldom encounter identifiably Hispanic riders.

JETS has attempted to promote its service in the Hispanic community and among Jonesboro's Hispanic leadership JETS has a very good reputation. However, in spite of consistent efforts for more than five years to gain Hispanic riders, JETS Hispanic ridership continues to be extremely low.

While JETS does not currently employ any bi-lingual staff (JETS did have several Spanish-speaking employees from 2006-2008), it does maintain a very close relationship with the Jonesboro-based Hispanic Community Services, Incorporated. In the past HSCI has provided Spanish language translation for JETS promotional materials and is very willing to provide translation services to assist JETS personnel serve Spanish speaking riders. Moreover, from 2006 through 2009, JETS regularly advertised in *El Hispano* a Jonesboro based Hispanic weekly newspaper that since has ceased publication.

Also, Jonesboro is the home to Arkansas State University's flagship campus. For the past five years, A-State in Jonesboro has been engaged in an intense and very successful International Student recruiting process. During this time, these efforts have brought thousands of students from Asia, Africa, and the Middle East to the A-State campus in Jonesboro.

JETS drivers and dispatchers do encounter/interact with this diverse student body somewhat regularly. A-State has developed its own bus service for this cohort that basically serves in the hours after JETS goes out of service and on weekends when JETS does not operate.

Moreover, most of A-State's International Students have very good English skills and they prefer to use English as they conduct their everyday lives in Jonesboro. JETS has an excellent relationship with the Office of International Programs at A-State and works with it to ensure that the needs of the A-State International Students are met relative to their use of public transit. JETS also has an agreement with the A-State Office of International Programs that allows JETS to request assistance with translation for the general population.

Task 1, Step 2: Become familiar with data from the U.S. Census.

S1601 LANGUAGE SPOKEN AT HOME 2012 American Community Survey 1-Year Estimates

Subject	Jonesboro city, AR; Jonesboro, AR Metro Area					
	Total		Percent of specified language speakers			
	Estimate	Margin of Error	Speak English "very well"		Speak English less than "very well"	
			Estimate	Margin of Error	Estimate	Margin of Error
Population 5 years and over	N	N	N	N	N	N
Speak only English	N	N	(X)	(X)	(X)	(X)
Speak a language other than English	N	N	N	N	N	N
Spanish or Spanish Creole	N	N	N	N	N	N
Other Indo-European languages	N	N	N	N	N	N
Asian and Pacific Island languages	N	N	N	N	N	N
Other languages	N	N	N	N	N	N
SPEAK A LANGUAGE OTHER THAN ENGLISH						
Spanish or Spanish Creole	N	N	N	N	N	N
5-17 years	N	N	N	N	N	N
18-64 years	N	N	N	N	N	N
65 years and over	N	N	N	N	N	N
Other Indo-European languages	N	N	N	N	N	N
5-17 years	N	N	N	N	N	N
18-64 years	N	N	N	N	N	N
65 years and over	N	N	N	N	N	N
Asian and Pacific Island languages	N	N	N	N	N	N
5-17 years	N	N	N	N	N	N
18-64 years	N	N	N	N	N	N
65 years and over	N	N	N	N	N	N
Other languages	N	N	N	N	N	N
5-17 years	N	N	N	N	N	N
18-64 years	N	N	N	N	N	N
65 years and over	N	N	N	N	N	N
CITIZENS 18 YEARS AND OVER						
All citizens 18 years and over	51,763	+/-1,465	99.5%	+/-0.5	0.5%	+/-0.5
Speak only English	97.4%	+/-1.3	(X)	(X)	(X)	(X)
Speak a language other than English	2.6%	+/-1.3	81.3%	+/-18.8	18.7%	+/-18.8
Spanish or Spanish Creole	1.5%	+/-1.2	71.3%	+/-35.7	28.7%	+/-35.7
Other languages	1.1%	+/-0.6	95.1%	+/-7.1	4.9%	+/-7.1
PERCENT IMPUTED						
Language status	3.7%	(X)	(X)	(X)	(X)	(X)
Language status (speak a language other than English)	2.7%	(X)	(X)	(X)	(X)	(X)
Ability to speak English	7.2%	(X)	(X)	(X)	(X)	(X)

Source: U.S. Census Bureau, 2012 American Community Survey

Task 1, Step 2 A: Identify the geographic boundaries of the area that your agency serves.

JETS service area is defined by the city limits of Jonesboro, AR. Appendix 1(p. 28) contains a current JETS system map showing the boundary of JETS service area.

Task 1, Step 2 B: Obtain Census data on the LEP population in your service area.

**DP02 SELECTED SOCIAL CHARACTERISTICS IN THE UNITED STATES
2008-2012 American Community Survey 5-Year Estimates**

Subject	Arkansas				Craighead County, Arkansas Estimate
	Estimate	Margin of Error	Percent	Percent Margin of Error	
Northern America	2,239	+/-343	1.7%	+/-0.3	83
LANGUAGE SPOKEN AT HOME					
Population 5 years and over	2,719,637	+/-485	2,719,637	(X)	89,719
English only	2,527,232	+/-2,935	92.9%	+/-0.1	85,364
Language other than English	192,405	+/-2,871	7.1%	+/-0.1	4,355
Speak English less than "very well"	88,468	+/-2,524	3.3%	+/-0.1	1,953
Spanish	141,370	+/-2,367	5.2%	+/-0.1	3,113
Speak English less than "very well"	69,779	+/-2,438	2.6%	+/-0.1	1,518
Other Indo-European languages	21,383	+/-1,277	0.8%	+/-0.1	425
Speak English less than "very well"	4,754	+/-604	0.2%	+/-0.1	94
Asian and Pacific Islander languages	25,163	+/-1,175	0.9%	+/-0.1	765
Speak English less than "very well"	12,769	+/-775	0.5%	+/-0.1	329
Other languages	4,489	+/-898	0.2%	+/-0.1	52
Speak English less than "very well"	1,166	+/-301	0.0%	+/-0.1	12

Task 1, Step 2 C: Analyze the data that you have collected.

The data from this table on page 4 presents that of the 89,719 peopled surveyed in Craighead County AR only 1,953 (2.1%) indicated that they spoke English "less than very well". Jonesboro is the population center of Craighead County AR and according to 2010 Census data had 70% of Craighead County's population. Using the 89,719 respondents in the DP02 data, Jonesboro should have approximately 62,800 of that number. If all 1,953 respondents reporting that they spoke English "less than very well" lived in Jonesboro that would only be 3.1% of the Jonesboro population.

Task 1, Step 2 D: Identify any concentrations of LEP persons in your service area.

In Jonesboro, 1,426 persons are identified as being Limited English Proficient. Of these 1,193 are foreign born and 1,206, or 85%, are Spanish speakers.

Task 1, Step 3: Consult state and Local sources of data.

There are eight public school systems in Craighead County, six of which have portions of their district within the corporate limits of Jonesboro, although none of the districts lie totally within the Jonesboro. Of these six public school districts that have at least part of their attendance area within the city of Jonesboro, two districts (Jonesboro Public Schools and Nettleton Public Schools) serve the portions of the city in which the LEP population is prone to reside.

The data provided by these two school districts over the past five years have consistently indicated an ELL/LEP enrollment of less than 5% (4.0-4.3%). Although Spanish is the predominant ELL language, there have generally been up to seven different languages worked with in any given year.

Of the 15 Jonesboro Public Schools and Nettleton Public Schools campuses, 14 are located within one-quarter mile of JETS Fixed Route system (by July 2014, the number of Jonesboro/Nettleton Public School campuses that have JETS service within one-quarter mile will be 15 of 15).

Task 1, Step 4: Community organizations that serve LEP persons.

JETS has current relationships with the following local institutions who provide services to the LEP community:

Arkansas State University – Jonesboro Campus

The Valley View Adult Education Center

The Hispanic Community Services, Incorporated

The ELL departments of the Jonesboro and Nettleton Public School districts

Task 1, Step 4.A: Identify community organizations and obtain information.

Arkansas State University – Jonesboro International Students/ESL Students

Arkansas State University-Jonesboro reported that for Spring 2014 semester they enrolled 95 English as a Second Language (ESL) students.

Valley View Adult Education Center – Number of ESL students in 2010-2011

Valley View Adult Education Center reports that it served 53 ESL students for the Fall 2013 semester.

Hispanic Community Services, Incorporated – Translation Services for Hispanics

For the year 2012-13, The Hispanic Community Services, Incorporated provided translation services for some 2700 LEP individuals. In that HCSI is a regional institution, not all of these individuals who were served reside in Jonesboro.

Jonesboro Public Schools ELL

As of February 2014 Nettleton Public Schools has 250 Limited English Proficient (LEP) students enrolled.

Nettleton Public Schools LEP

As of February 2014 Nettleton Public Schools has 124 Limited English Proficient (LEP) students enrolled.

Factor 2: The frequency with which LEP individuals come into contact with your program, activities, and services

Task 2, Step 1: Review the relevant programs, activities, and services you provide.

As was discussed in Step 1, JETS, apart from its fairly frequent contact with ASU's International Students, does not generally experience much contact with the LEP population. This is especially true of the lack of utilization of JETS transit by the Hispanic community.

This reality that the Hispanic population in Jonesboro seldom rides JETS transit continues to exist in spite of JETS having taken extraordinary efforts to make our service more popular to the Hispanic community. Specifically, JETS has produced transit materials in Spanish, advertised in the now-defunct *El Hispano* newspaper for several years, and located stops on two of the three JETS Fixed Routes that are immediately adjacent the HCSI offices. Moreover, JETS serves the areas of the City of Jonesboro in which Hispanic families generally live and provides Fixed Route service to many of the areas where Hispanic people work and shop. Moreover, 14 of the 15 Jonesboro Public Schools/Nettleton Public Schools campuses (all of which serve LEP students) have access to JETS Fixed Route service within one-quarter mile of the campuses.

As an indication of how closely JETS Management collaborates with that of HCSI, JETS annually supports the Hispanic Center's HUD application for CBDG funding to help fund its translation services. JETS, as well, advertises in HCSI publications and participates in the annual Hispanic Festival held in early May each year.

JETS Transit Director has also communicated with the A-State International Student community at least semi-annually. JETS has also collaborated with instructors of International Students to familiarize them with JETS Fixed Route buses via "Travel Training."

Task 2, Step 2: Review information obtained from community organizations.

JETS communicates on a regular basis with officers of the Hispanic Community Services, Incorporated (HCSI) in an effort to learn of any change in the dynamics affecting the local Hispanic community. HCSI Executive Director Gina Gomez and the JETS Transit Director frequently exchange emails about HCSI's fund raising efforts that JETS attempts to assist with. While Valley View Adult Education Center does offer ESL classes to non-English speakers throughout the year, JETS Route 47 which serves the Adult Education Center does not report any significant LEP customers. Some of this pattern of non-use for access to this ESL instruction may be due to these classes being offered primarily in the evening after JETS suspends service at 6:30 p.m.

Task 2, Step 3: Consult directly with LEP persons.

The approved FFY 2012 Unified Planning Work Program (UPWP), Task 1.0 Administrative and Management Activities (page 9), Part A – Objective, states that the Jonesboro MPO will “ [E]nsure a proactive public participation process that provides full public access to key discussions in developing plans and transportation improvement programs.” In accordance with this commitment, JETS will work under the auspices of the MPO, and in conjunction with the Hispanic Community Services, Incorporated, in developing and disseminating a survey to identify barriers for LEP persons as it relates to accessing the JETS transit system. This survey is planned for early November 2011.

Furthermore, JETS will continue to work closely with HCSI to develop Hispanic ridership. Moreover, JETS will place Spanish language information inside all of its Fixed Route vehicles, inviting Hispanic individuals to contact HCSI for information as to how to direct inquiries to JETS about individual/family/community service needs.

JETS will also continue to maintain close communication with A-State’s Office of International Programs so as to insure a current focus on the those at A-State that may have LEP needs.

Factor 3: The importance to LEP persons of your program, activities, and services

Task 3, Step 1: Identify your agency’s most critical services.

JETS two public transit services are Fixed Route Service and ADA Paratransit Service.

Of these two, it is on JETS Fixed Route Service, with its larger ridership, where negative consequences will most frequently occur if JETS is not prepared to minimize language challenges for the LEP population. If JETS is unready to provide transit information/verbal assistance for its LEP Fixed Route riders, they will be denied their right to equal transportation access, potentially experience serious complications in their travel, and suffer tremendous frustration in attempting to use public transportation. LEP riders unable to receive needed information might be late to employment or education, miss medical/dental appointments, or experience other serious inconvenience or complications as they travel in our community.

In other circumstances, potential danger and/or actual injury could occur to JETS Fixed Route LEP riders. In the event that a JETS driver needed to provide emergency evacuation instructions or information pertinent to security awareness or emergency preparedness, passengers with limited English proficiency are seriously disadvantaged, potentially to a life-threatening degree.

Also, for JETS ADA Paratransit clients having one or more significant personal mobility issues being limited in their English proficiency brings added disability. For this special population, confusion in their attempts to employ paratransit can lead to “No Shows” and/or late cancellations that could jeopardize their being eligible to use public transit to access health care, shopping, banking services, etc. This would certainly have the negative acute impacts described in the paragraph above and could even add to the seriousness of their chronic disability.

Accordingly, JETS will make every effort to ensure that possessing limited English language skills is not a barrier to one’s ability to use JETS service. JETS has installed Google Translate software on its Website to help mitigate the difficulty that LEP riders could experience in obtaining critical scheduling

information. In the more directly operational theater, with Spanish being the language most frequently used by JETS LEP riders, JETS has posted Spanish-language information about fare prices and emergency operational procedures in its vehicles.

Task 3, Step 2: Review input from community organizations and LEP persons.

JETS is very active in the Jonesboro community and it actively seeks opportunities to engage with community organizations, especially those who generally serve the LEP population. Accordingly, JETS intentionally maintains a strong relationship with Hispanic Community Services, Inc. (HCSI), a local non-profit that exists to assist in the integration of the Hispanic community into the larger whole. JETS provides HCSI information about its planning activities that HCSI includes in its monthly newsletter to Hispanics. JETS and HCSI also cooperate often throughout the year to promote both open dialogue between JETS and the Hispanic community and mutually beneficial activities.

JETS also makes limited use of recently developed technologies to disseminate information about and to encourage participation in its planning activities. Notices of planning meetings are posted on JETS Website. Email notices publicizing these events are also sent to a diverse group of local organizations. The following agencies are emailed information about upcoming JETS public planning meetings, along with a request for the addressee to provide the attached information to their clientele.

Abilities Unlimited, Incorporated
Arkansas Department of Human Services - Jonesboro
Crowleys Ridge Development Council
David Puryear Center
East Arkansas Area Agency on Aging
East Arkansas Planning and Development District
Focus, Incorporated
Hispanic Community Services Incorporated
Jonesboro Urban Renewal and Housing Authority
Jonesboro Regional Public Library
Mid-South Health Systems
St. Bernards Senior Centers
The Learning Center
The Mall at Turtle Creek
Wesley on the Ridge
Valley View Adult Education Center

JETS has especially attempted to make contact with LEP individuals through the Jonesboro and Nettleton School Districts LEP programs and through the ESL instruction offered by the Valley View Adult Education Center.

JETS actively participates each year in the public meetings held in each of Jonesboro's six aldermanic wards. Sponsored by the Mayor of the City of Jonesboro, these generally well-attended meetings attract a good representation of the diverse demographics of each of these City Council election districts. Many of those attracted to these ward meetings come for purposes other than public transportation business and, accordingly, are availed of an opportunity to participate in discussions concerning public transportation that they would otherwise probably not have. These meetings are not generally well-attended by LEP members of the community.

Goals established by JETS for reaching the LEP members of our community are as follows:

- Determine what non-English languages and other cultural barriers exist to public participation within the City of Jonesboro.
- Provide a general notification of meetings, particularly forums for public input, in a manner that is understandable to the various populations within the City of Jonesboro.
- Hold meetings in locations which are accessible and reasonably welcoming to all area residents, including, but not being limited to, low-income and minority members of the community.
- Provide effective means to obtain significant information from those segments of the community who are unlikely to attend public meetings.
- Provide a framework of diverse actions appropriate to a variety of plans and programs, as well as for potential alternatives to these plans and programs.
- Employ a variety of media to convey the information presented, including but not limited to charts, graphs, photos, maps and the Internet.
- Determine the particular stakeholders that will be potentially affected by the transportation planning that is to be considered at a specific public meeting and make appropriately targeted efforts to engage their participation.

In that Spanish speakers make-up the vast majority of the relatively small LEP population residing in Jonesboro, developing an effective means of reaching the Hispanic community (primarily through the HCSI newsletter) with transportation planning information will provide contact with the vast majority of Jonesboro's LEP population.

Although JETS is certainly interested in developing an effective means of communicating with the remaining portion of Jonesboro's LEP population, none of the other linguistic groups reported in the Jonesboro Census data have a concentration sufficient to develop and support an advocacy agency such as HSCI. JETS will, however, continue to be sensitive to developments within its LEP population and seek opportunities to help establish effective communication with other LEP groups as the opportunities arise.

Factor 4: The resources available to the recipient and costs

Task 4, Step 1: Inventory language assistance measures currently being provided along with associated costs.

To assist LEP individuals develop information that will help them access public transit in Jonesboro, JETS is currently engaged in:

- ❖ Working with the Hispanic Community Services, Incorporated to link a new JETS website being developed in the summer of 2014 to that of HCSI (No Cost)
- ❖ Working with the Hispanic Community Services, Incorporated to develop informational material about Route times (No Cost to Riders)
- ❖ Developing for the new JETS Website a Google translation application (No Cost to Users)

Annual costs for these measures will be negligible.

Task 4, Step 2: Determine what, if any, additional services are needed to provide meaningful access.

Although the contact between JETS staff and LEP individuals is rather infrequent, JETS personnel should not be allowed to assume that this pattern will continue to exist. Therefore, JETS staff must be extremely vigilant and very well prepared for the instances when such contact does occur. We emphasize frequently to those of our staff who will be most likely to encounter an LEP rider that being fluent in “Arkansaw” is not sufficient. HCSI’s Gina Gomez believes that one of the most important factors in developing consistent Hispanic ridership is that they are made to feel wanted **when they do finally decide to ride**. JETS staff must be prepared to exhibit this behavior.

Task 4, Step 3: Analyze your budget.

JETS is a fairly new and extremely small public transit system with decidedly limited resources. Taking this into consideration, and given the relatively small percentage of Jonesboro’s population considered LEP, it would not be prudent at this juncture for JETS to devote a significant portion of its budget to developing bi-lingual materials. However, JETS will not be unresponsive to the needs of LEP individuals.

The use of Google translator technology will cost neither JETS nor its patrons anything and will allow JETS information that appears on JETS Website to be translated into a variety of languages. While JETS recognizes that the use of such technology may be beyond the means and capabilities of many in the LEP community, it also is of the opinion that this technology is too valuable to not use.

Definitely, capital budget increases for signage inside of JETS transit vehicles and facilities should be considered in the years beyond 2014.

Task 4, Step 4: Consider cost effective practices for providing language services.

JETS should begin to collaborate with the community organizations listed in Task 1 so as to provide cost effective practices to the LEP population within Jonesboro. This collaboration could provide:

- A more comprehensive service to the LEP community
- Assistance with translating both printed and on-line information
- Travel Training
- Educational opportunities to help improve access

JETS Community Advisory Board

Since its inception in 2005, JETS has intentionally focused on developing a Community Advisory Board (CAB) that represented the diversity within the City of Jonesboro. The Ordinance that created the JETS specifies that each of the city's six aldermanic wards shall have one representative on the CAB, with one additional member serving in an At-Large position. While a policy to insure diversity was not a part of the enabling Ordinance, the JETS CAB has always been composed of both black and white women and men. At no time in JETS history has the African-American representation on the JETS CAB been below three of the seven members. Also, at no time has the female representation been below three of the seven members. And while there is no "Black seat(s)" on the JETS CAB, when openings occur there is an intent to fill these positions with men and women who provide public transit in Jonesboro the best possible advisory board and also who represent the diversity that exists in our city. There has been discussion exploring the need for Hispanic inclusion in the planning process, as well as being intentional to ensure that the voices of the disabled community are heard. There has also been serious discussion about expanding the public input that comes to JETS via the CAB. One possibility that has been offered for consideration is expanding the CAB from seven to thirteen, fifteen, or more members. Another suggestion was to create an "advisory committee" to the CAB that would include specific stakeholders from the community as well as defined representation from JETS Fixed Route and Paratransit ridership. There is a sincere desire among the JETS CAB members that a larger, very diverse base of public participation be developed that would allow for even more public participation in the oversight planning process for JETS.

Members Name	Ward Represented	Term Expires	Race
Dr. Martie Shull	1	2/1/2017	Caucasian
Mr. Roger McKinney	2	2/1/2017	African American
Mr. Jimmy Cooper	3	2/1/2015	Caucasian
Ms. Kathy Cole	4	2/1/2015	Caucasian
Reverend Charlene Johnson	5	2/1/2015	African American
Mr. Rickey Greer	6	2/1/2016	African American
Dr. Rebecca Matthews	At Large	2/1/2016	Caucasian



JETS Monitoring of Sub-Recipient Compliance with Title VI

JETS does not have any subrecipients.



JETS Equity Analysis for Title VI

JETS has not constructed any facility such as a vehicle storage facility, maintenance facility, operations center, etc, since the filing of the last Title VI report in 2011.



**Jonesboro city Council Resolution Approving
JETS 2014 Title VI Program**

RESOLUTION APPROVING THE TITLE VI PROGRAM SUBMITTED FOR THE JETS SYSTEM

Whereas, the City of Jonesboro operates the Jonesboro Economical Transportation System (JETS) public transit service, and

Whereas, as a funding requirement, JETS must submit a Title VI Program, approved by the City Council.

Now, therefore by it resolved by the City Council for the City of Jonesboro:

1. That the Title VI Program for the JETS system has been reviewed and is hereby approved for submission.
2. That Mayor Harold Perrin and city Clerk Donna Jackson are authorized to execute all documents necessary to effectuate this agreement .



2014 Title VI Service Standard Report

JETS Vehicle Load for 2013

Vehicle load can be expressed as the ratio of passengers to the total number of seats on a vehicle. For example, on a 40-seat bus, a vehicle load of 1.3 means all seats are filled and there are approximately 12 standees. A vehicle load standard is generally expressed in terms of peak and off-peak times. Transit providers that operate multiple modes of transit must describe the specific vehicle load standards for peak and off-peak times for each mode of fixed route transit service (i.e., bus, express bus, bus rapid transit, light rail, heavy rail, commuter rail, passenger ferry, etc., as applicable), as the standard may differ by mode.

In 2013, JETS operated its Fixed Route service with Medium Cut-Away Buses that provided for 16 seated passengers, two wheel-chair passengers, and eight standees. JETS does not differentiate between peak and off-peak service. JETS vehicle load is 1.5.

JETS Vehicle Headway for 2013

Vehicle headway is the amount of time between two vehicles traveling in the same direction on a given line or combination of lines. A shorter headway corresponds to more frequent service. Vehicle headways are measured in minutes (e.g., every 15 minutes); service frequency is measured in vehicles per hour (e.g., 4 buses per hour). Headways and frequency of service are general indications of the level of service provided along a route. Vehicle headway is one component of the amount of travel time expended by a passenger to reach his/her destination. A vehicle headway standard is generally expressed for peak and off-peak service as an increment of time (e.g., peak: every 15 minutes; and off peak: every 30 minutes). Transit providers may set different vehicle headway standards for different modes of transit service. A vehicle headway standard might establish a minimum frequency of service by area based on population density. For example, service at 15-minute peak headways and 30-minute off-peak headways might be the standard for routes serving the most densely populated portions of the service area, whereas 30-minute peak headways and 45-minute off-peak headways might be the standard in less densely populated areas. Headway standards are also typically related to vehicle load. For example, a service standard might state that vehicle headways will be improved first on routes that exceed the load factor standard or on routes that have the highest load factors.

In 2013, JETS operated its Fixed Route service with a Vehicle Headway on each of its Fixed Route lines of one hour. In January 2014, JETS adjusted its Fixed Routes to provide three lines with 30 minute headways and one line that retains a one-hour headway. JETS does not differentiate between peak and off-peak service. In July 2014, JETS plans to add a fourth 30 minute headway Fixed Route in an area of Northeast Jonesboro that has seen nearly a half-billion dollars in development over the past three years and which offers new employment opportunities for many of Jonesboro's lower-wage workers.

JETS On-Time Average for 2013

On-time performance is a measure of runs completed as scheduled. This criterion first must define what is considered to be “on time.” For example, a transit provider may consider it acceptable if a vehicle completes a scheduled run between zero and five minutes late in comparison to the established schedule. On-time performance can be measured against route origins and destinations only, or against origins and destinations as well as specified time points along the route. Some transit providers set an on-time performance standard that prohibits vehicles from running early (i.e., ahead of schedule) while others allow vehicles to run early within a specified window of time (e.g., up to five minutes ahead of schedule). An acceptable level of performance must be defined (expressed as a percentage). The percentage of runs completed system-wide or on a particular route or line within the standard must be calculated and measured against the level of performance for the system. For example, a transit provider might define on-time performance as 95 percent of all runs system-wide or on a particular route or line completed within the allowed “on-time” window.

JETS defines a “late arrival” as one in excess of five minutes behind schedule and an “early arrival” as one in excess of one minute early. JETS overall percentage for “On Time Performance” for 2013 was 87%. The Arrival On-Time percentage was 79% and the Departure On-Time percentage was 94%.

JETS Service Availability for 2013

Service availability is a general measure of the distribution of routes within a transit provider’s service area. A standard might also indicate the maximum distance between stops or stations.

JETS Fixed Route service is designed to serve the most “transit needy” sectors of the City of Jonesboro that have the greatest density of population. Consult Appendix 2 for CBDG maps indicating JETS service to areas with low income housing. Also, a review of the location of JETS bus stops indicate that they generally are between .25 miles and .33 miles in those residential areas that are most “transit needy”. Consult Appendix 1 for a current map of JETS Fixed Routes showing each bus stop location.

JETS also serves destinations that are of great interest to many of Jonesboro’s most low wage and “transit needy” workers (restaurants, hotels, hospitals, public schools, institutions of higher education, adult education center, Department of Human Services, Workforce). In July 2014, JETS plans to add a fourth 30 minute headway Fixed Route in an area of Northeast Jonesboro that has seen more than a half-billion dollars in development over the past three years and which offers new employment opportunities for many of Jonesboro’s lower-wage, “transit needy” workers.

JETS Title VI SERVICE POLICIES

Service policies described below are a means for JETS to further ensure that amenities are being distributed with equality throughout the JETS service area.

Per FTA Circular 4702.1B, the following service policies are required:

- Transit Amenities**
- Vehicle Assignment**

Transit Amenities

Transit amenities such as bus shelters, benches, kiosks, trash receptacles, and illuminated lighting devices will be distributed equitably throughout the service area based on boarding levels, proximity to major landmarks such as commercial or employment centers, population need (i.e. senior communities), and geographic location.

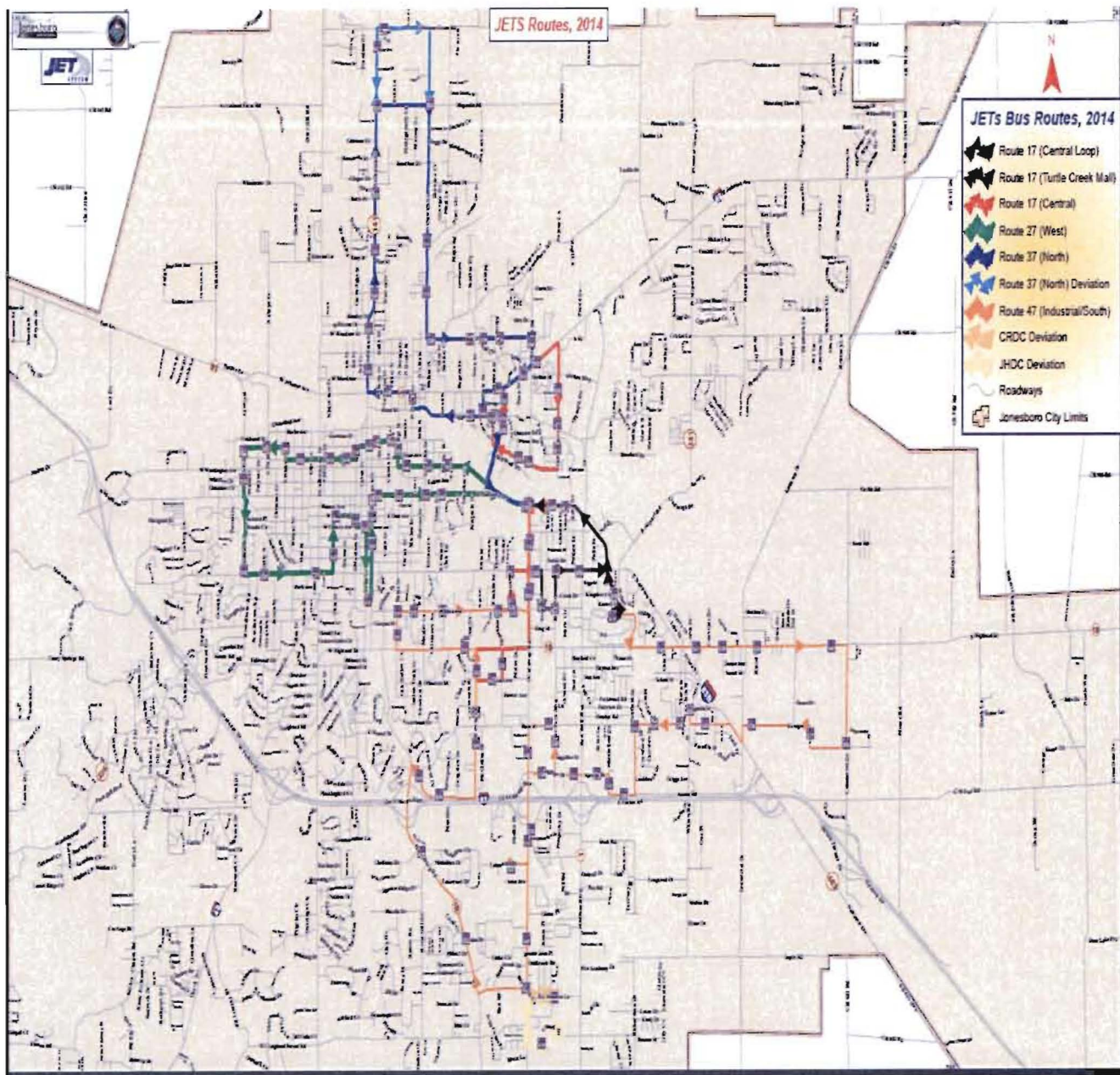
Vehicle Assignment

All JETS Fixed Route buses in revenue service are 100% handicap accessible. The fleet consists of medium cutaway conventionally fueled buses used for fixed and commuter express routes. All vehicles have air conditioning units and are equipped with wheelchair lifts. All vehicles are cleaned and maintained as specified in JETS maintenance and operation guidelines.

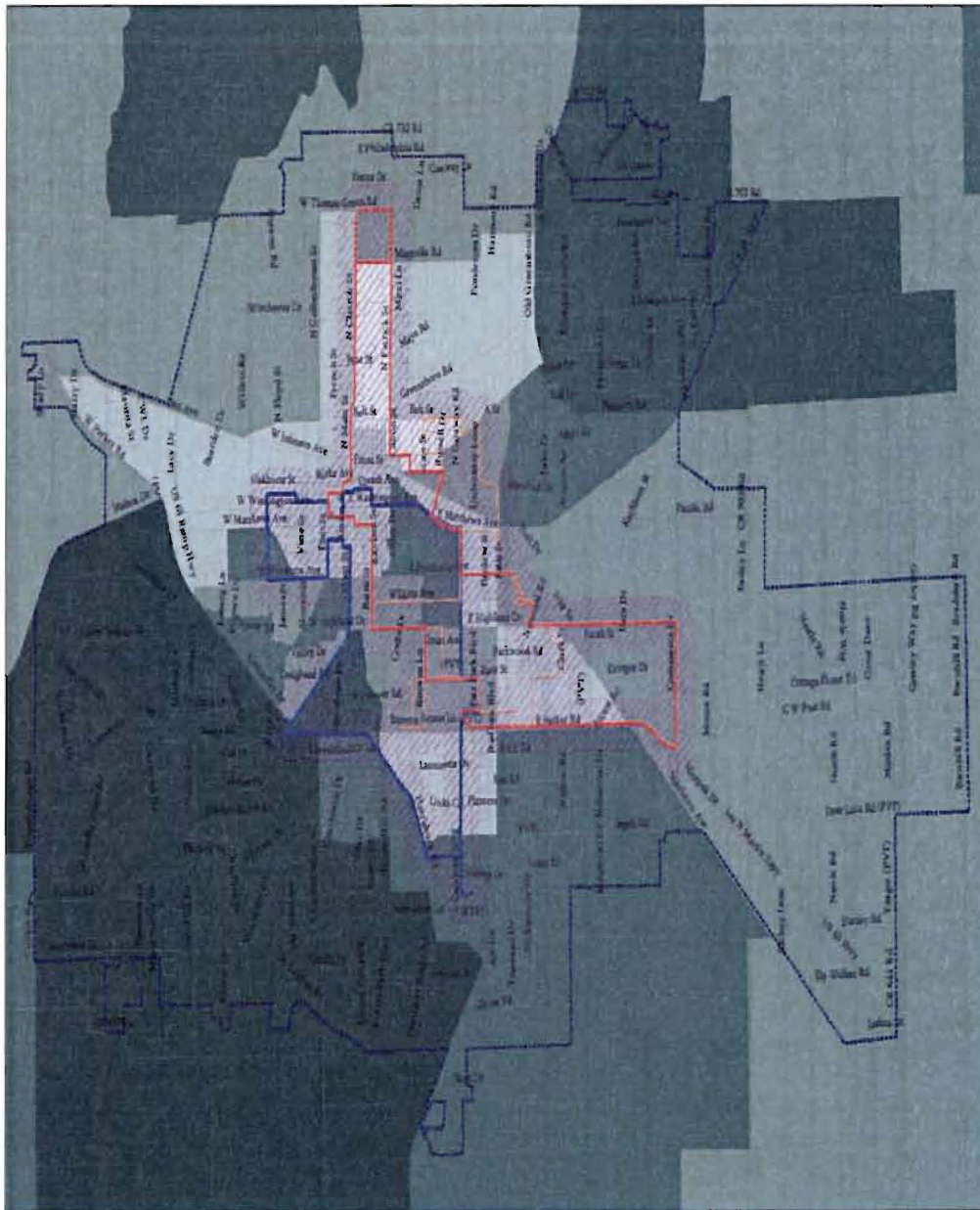
Every JETS driver in Fixed Route service must be completely familiar with, and able to drive medium cutaway bus. On a daily basis, JETS drivers are randomly assigned a bus by the dispatch office by JETS Route Coordinator.

Appendices

Appendix 1- JETS Fixed Route System (2014)



Appendix 2 (a) – CBDG Map with JETS 2013 Routes – ¼ mile Buffer



JETS Route Service and Household Income

Median household income, by Census block group
(Source: ACS 2006-2010)

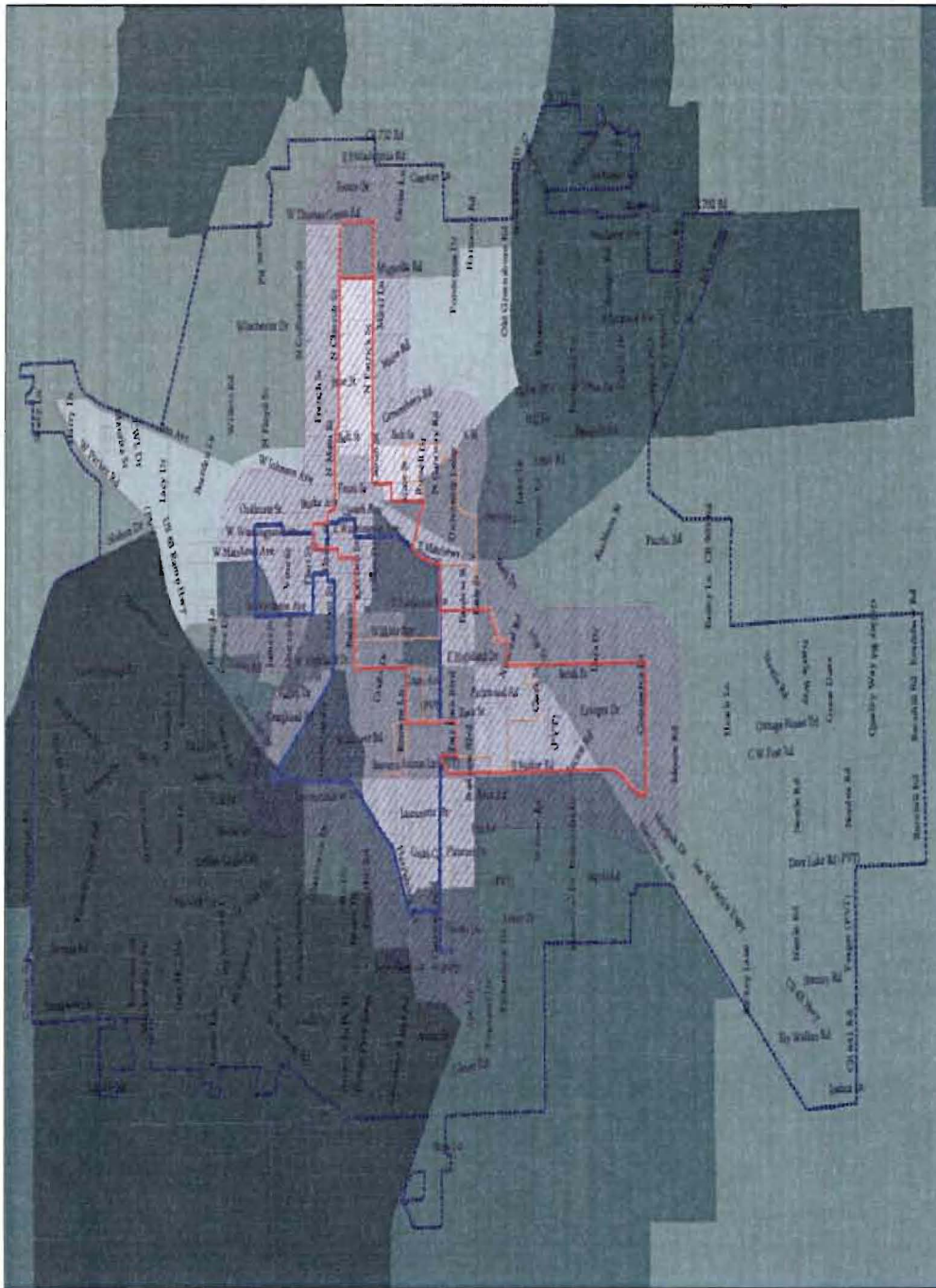
Legend	
[Blue outline] City Limits	[Lightest blue] Median Household Income \$15,000 or less
[Hatched box] ¼ Mile Buffer	[Light blue] \$15,001 – \$30,000
[Thin line] Road	[Medium-light blue] \$30,001 – \$45,000
[Blue line] JETS Routes	[Medium blue] \$45,001 – \$60,000
[Dotted blue line] Route 15 Deviation	[Dark blue] \$60,001 – \$75,000
[Red line] Route 35	[Darkest blue] \$75,000 or greater
[Dotted red line] Route 35 Deviation	
[Thin red line] Route 55	

Jonesboro Economical
Transportation System

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Facsimile: (870) 933-5649
Web: www.ridejets.com

May 2012

Appendix 2 (b) – CBDG Map with JETS 2013 Routes – 1/2 mile Buffer



JETS Route Service and Household Income

Median household income, by Census block group
(Source: ACS 2006-2010)

0 0.5 1 1.5 2 Miles

Legend	
	City Limits
	1/2 Mile Buffer
	Road
	JETS Routes
	Route 15
	Route 15 Deviation
	Route 35
	Route 35 Deviation
	Route 55
	Median Household Income: \$15,000 or less
	\$15,001 – \$30,000
	\$30,001 – \$45,000
	\$45,001 – \$60,000
	\$60,001 – \$75,000
	\$75,000 or greater

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