

# TITLE VI PROGRAM

# JET Regional Transfer Center



JET Multi-Modal Central Transfer Facility - Completed October 2015

#### **Table of Contents**

| I.    | Company Description and History2  |
|-------|---|
| II.   | JET Title VI Notice to the Public   |
| III.  | JET Title VI Complaint Procedures4-5  |
| IV.   | JET Title VI Complaint Form6-7  |
| V.    | List of Transit-Related Title VI Investigations, Complaints,  |
| VI.   | Public Participation Plan9-11   |
| VII.  | Language Assistance Plan  |
|       | Factor 1: The number and proportion of LEP persons served or encountered in the eligible service population |
| VIII. | Table Depicting Membership of JET's Non-Elected Board20 Broken Down by Race                                 |
| IX.   | Providing assistance and monitoring of Sub-Recipients21   |
| X.    | JET Title VI Equity Analysis  |
| XI.   | JET Title VI Service Standards  |
| XII.  | JET Title VI Service Policies   |
| APPE  | NDICES  |
|       | APPENDIX 1  |



# A History and Description of the Jonesboro Economical Transportation System (JET)

The Jonesboro Economical Transportation System (JET) was created by ordinance ORD-05:211 of the City of Jonesboro, passed on July 19, 2005. JET's initial fixed route service was on June 4, 2006. Paratransit service was added by JET in early 2007. The City of Jonesboro currently has a population estimated to be some 73,000 and it is comprised of 80 square miles located on Crowleys Ridge in Eastern Arkansas.

JET currently serves Jonesboro with five (5) fixed routes. Operational hours are from 5:15 a.m. until 6:15 p.m. Complementary paratransit service is also offered by JET within .75 mile of its fixed route service.

JET operates from its Administration and Operations Facility located at 2630 Lacy Drive in west Jonesboro. This facility was constructed with ARRA funding in 2010. JET also completed its Regional Transfer Center at 711 Sooth Caraway Road in October of 2015.

Each of JET's seven (7) buses is equipped with a surveillance camera system, a two-way radio, an AVL system, a GenFare system, a wheel-chair lift and an external bicycle rack. Additionally, each of JET's four (4) paratransit vans is outfitted with a two-way radio, an AVL system, a GenFare system, and it has wheel-chair access.

Additionally, JET's fixed route riders have access to an app showing riders the location of the next bus at each of JET's 134 bus stops. This app was created through collaboration between the Information systems Department of Arkansas State University, the City of Jonesboro IT Department, and JET. The software that "powers" this app was developed by RouteMatch.





#### Notifying the Public of Rights Under Title VI

### The City of Jonesboro

- Title VI of the Civil Rights Act of 1964 states: No person in the United States shall on the grounds if 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 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.
- JET's Notice to the Public is posted:
  - On the JET website
  - In the lobby of JET's Administration and Operation Facility
  - In the waiting room of the JET Regional Transfer Center
- For more information on the City of Jonesboro's civil rights program, and the procedures to file a complaint, contact (870) 933-4640; email <a href="mailto:ddouglas@jonesboro.org">ddouglas@jonesboro.org</a>; 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 <a href="http://www.jonesboro.org/Humres/HR.html">http://www.jonesboro.org/Humres/HR.html</a>
- A complainant may file a complaint directly with the Federal Transit Administration by contacting 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 a language other than English, contact (870) 933-4640



#### Jonesboro Economical Transit System

P.O. Box 1845, Jonesboro, AR 72404•1845 2630 Lacy Drive 870•935•5387 (Voice)/870•933•5649 (Fax)

#### **JET Title VI Complaint Procedures**

This section outlines the Title VI complaint procedures related to the programs, services, and benefits provided by JET. However, nothing outlined herein would prevent a complainant from filing a formal complaint with the City of Jonesboro, the 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 federalfinancial 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 also have the right to complain directly to the appropriate Federal agency. Every effort will be made to obtain early resolution of any/all 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.

- 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 JET service or that of a JET sub-recipient/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 JET 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 JET 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 JET 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 JET is found to be 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, each of whom will have the authority to modify the findings 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. JET will reconsider the findings in the investigative report if new facts come to light.
  - b. If the 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 bytelephone at (817) 978-0558.
- 9. A copy of the original complaint, JET 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 FTA by JET.

### **JET Title VI Complaint Form**

| -  | Telephone (Work):   |  |
|--|---|--|
| -  | Telephone (Work):   |  |
|  | Telephone (Work):   |  |
|  |   |  |
|  |   |  |
| Large Print                                  | Audio Tape  |  |
| TDD  | Other   |  |
|  |   |  |
| your own behalf?                             | Yes*  | No   |
| question, go to Section I                    | II  |  |
|  | person for  |  |
| -  |   | No   |
|  | 1 1   |  |
| perienced was based o                        | n (please check all that apply):  |  |
| [] Color                                     | [] National Origin  |  |
| (Month, Day, Year):                          |   |  |
| involved. Include the nown) as well as names | ame and contact information of t  | he person(s) who   |
|  | your own behalf?  question, go to Section I  and relationship of the p  led for a third party:  btained the permission on behalf of a third par  perienced was based o  [] Color  (Month, Day, Year): what happened and why | your own behalf?  Question, go to Section III  and relationship of the person for  led for a third party:  Obtained the permission of the on behalf of a third party.  Perienced was based on (please check all that apply):  [] Color  [] National Origin  (Month, Day, Year):  what happened and why you believe you were discriminate involved. Include the name and contact information of the lown) as well as names and contact information of any well as names and contact info |

| Section IV:  |                                   |                   |
|--|-----------------------------------|-------------------|
| Have you previously filed a Title VI complaint with this agency              | ? Yes                             | No                |
| Section V:   |                                   |                   |
| Have you filed this complaint with any other Federal, State, or State court? | , or local agency, or with any Fe | ederal            |
| If yes, check all that apply:  |                                   |                   |
| []Federal Agency:  |                                   |                   |
| (] Federal Court:  | []State Agency:                   |                   |
| [] State Court:  | []Local Agency:                   |                   |
| Please provide information about a contact person at the Name:               | agency/court where the com        | olaint was filed. |
| Title:   |                                   |                   |
| Agency:  |                                   |                   |
| Address:   |                                   |                   |
| Telephone:   |                                   |                   |
| Section VI:  |                                   |                   |
| Name of agency complaint is against:   |                                   |                   |
| Contact person:  |                                   |                   |
| Title:   |                                   |                   |
| Telephone number:  |                                   |                   |
| You may attach any written materials or other information the                | nat you think is relevant to you  | complaint.        |
| Signature and date required below  |                                   |                   |
| Signature  | <br>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

# JET Title VI List of Investigations, Lawsuits, and Complaints

| Investigations | Date<br>(Month, Day, Year) | Summary (include basis of complaint: race, color, or national origin)  Not Applicable | Status  Not Applicable | Actions Taken  Not Applicable |
|----------------|----------------------------|---|------------------------|-------------------------------|
| 1.             |                            |   |                        |                               |
| 2.             |                            |   |                        |                               |
| Lawsuits       | Not Applicable             | Not Applicable  | Not Applicable         | Not Applicable                |
|                |                            |   |                        |                               |
| 2.             |                            |   |                        |                               |
|                |                            |   |                        |                               |
| Complaints     | Not Applicable             | Not Applicable  | Not Applicable         | Not Appl icable               |
| 1.             | 11 33.3.3                  | 11  |                        |                               |
| 2.             |                            |   |                        |                               |
|                |                            |   |                        | 8                             |

# Jonesboro Economical Transportation System (JET) Public Participation Plan (PPP)

#### Goals and Objectives for the Public Participation Plan

The Public Participation Plan (PPP) is a guide for JET's ongoing public participation endeavors. Its purpose is to ensure that JET utilizes effective means of providing information and receiving public input on transportation decisions from low income, minority and limited English proficient (LEP) populations, as required by Title VI of the Civil Rights Act of 1964 and its implementing regulations.

Under federal regulations, transit operators must take reasonable steps to ensure that Limited English Proficient (LEP) persons have meaningful access to their programs and activities. This means that public participation opportunities, normally provided in English, should be accessible to persons who have a limited ability to speak, read, write, or understand English.

In addition to language access measures, other major components of the PPP include: public participation design factors; a range of public participation methods to provide information, to invite participation and/or to seek input; and performance measures and objectives to ensure accountability and a means for improving over time.

If JET knows that they will be presenting a topic in a geographic location with a known concentration of LEP persons, JET will make a concerted effort to have meeting notices, fliers, advertisements, or agendas printed in the alternative language. As well, JET will coordinate with local community groups such as HCSI to have someone available who can help interpret information at the meeting. When running a general public meeting notice in a geographic location that could be of potential importance to LEP persons or if staff will be hosting a meeting or a workshop, JET will, to the extent possible, insert the following clause: "An interpreter will be available" in the predominant language. JET will seek to coordinate with local community groups such as HCSI to have someone available who can help interpret information at the meeting. JET will include this statement when running general public meeting notices: "JET will strive to provide reasonable accommodations and services for persons who require special assistance to participate in this public involvement opportunity."

JET will develop and disseminate Title VI Program information to employees, sub-recipients, contractors, consultants, and beneficiaries as well as the general public. Public dissemination may include postings of policy statements, inclusion of Title VI language in contracts or other agreements, website postings and annually publishing the Title VI Policy Statement in newspapers having a general circulation and informational brochures. Ensure the public service announcements or notices are posted of proposed projects, hearings, meetings, or formation of public advisory boards, in newspapers or other media reaching the affected community. Ensure the full utilization of available minority publications or media; and where appropriate, provide written information in languages other than English.

An important portion of JET's public transportation planning process is performed in conjunction with the transportation planning process of the Jonesboro Metropolitan Planning Organization's (MPO). In that JET 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 JET into existence. Moreover, JET's Transit Director is a member of the Jonesboro MPO's Technical Committee and the Chair of JET's Community Advisory

Board serves on the MPO's Policy Committee. Thus, JET 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. JET was integrally involved in the creation of this plan and actively participated in the public hearings surrounding its adoption.

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

Also, JET intentionally maintains a strong relationship with Hispanic Community Services, Inc. (HCSI), a regional non-profit headquartered in Jonesboro. HCSI exists to assist in the integration of the Hispanic community into the larger whole. HCSI's Executive Director is a member of JET's seven member Community Advisory Board. Moreover, JET provides HCSI information about its planning activities that HCSI periodically distributes to Hispanics. JET also cooperates with HCSI activities throughout the year, such as by participating in the annual Hispanic Celebration in May.

Another major focus for JET over the past decade 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 JET foremost consideration, JET has also given much attention to providing a more robust transit service for the growing international student body at A-State. With the University having increased its international student enrollment to where it is more than 7% of the student body, the transportation needs of this cohort of students is definitely on JET's "radar". Although most of these "internationals" are from Asia and the Middle East, there are also European and African students attending A-State. Moreover, most of these international students come from countries that have well-developed public transit systems in even the most modest-size cities.

Even though the classes of these Internationals are conducted in English, and there is much emphasis for them to be "immersed" in the American culture, JET is committed to ensuring that A-State's International students can access JET 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. JET also periodically attends events provided for International students by the University.

JET also works to establish public participation through the activity of JETS Community Advisory Board (CAB). Information about the JET CAB can be found on JET's website (www.ridejet.org) and The CAB's regular monthly meetings are reported in the Jonesboro Sun, the daily newspaper for Northeast Arkansas. JET's CAB meetings also attract regular coverage from KASU (regional public radio), as well as periodic coverage on KAIT, the television station whose 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.

JET also makes use of recently developed technologies to disseminate information and to encourage participation in its planning activities. Notices of planning meetings are posted on JET website. Email notices publicizing these events are also sent to a diverse group of local organizations. The following agencies are emailed information about upcoming JET 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
East Arkansas Planning and Development District
Hispanic Community Services Incorporated
Jonesboro Urban Renewal and Housing Authority
Jonesboro Regional Public Library
St. Bernards Senior Center
The Learning Center
The Mall at Turtle Creek
Valley View Adult Education Center

Also available on the JET website is contact information for JET's management. Frequently, JET officials receive emails after hours/on weekends and during holidays from citizens needing information about JET's services. Such requests are responded to in a timely manner and quite often the requests for information are fully complied with before JET's offices re-open.



#### JET Language Assistance Plan

#### Improving Access for People with Limited English Proficiency Four Factor Analysis

The Jonesboro Economical Transportation System (JET), 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).

JET 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 6.6% of Jonesboro's population over five years of age speaks a language at home other than English {2010-2014 S1601 LANGUAGE SPOKEN AT HOME). At 4.4%, the most common non-English language spoken in homes is Spanish or Spanish Creole. With LEP populations as low as these numbers indicate, JET's staff have infrequent contact with this segment of our population.

Although Spanish-speaking individuals and families have increasingly located in Jonesboro *over* the past two decades, this demographic is still not as sizeable as in Central and Western parts of Arkansas or several other parts of the South. 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, JET's drivers and dispatchers very seldom encounter identifiably Hispanic riders.

JET has attempted to promote its service in the Hispanic community and among Jonesboro's Hispanic leadership JET has a very good reputation. However, JET's Hispanic ridership has not increased in spite of our concerted efforts. JET has finally succeeded in employing a driver who identifies as Hispanic and we are hopeful that having him on staff will assist JET to develop both more Hispanic riders and additional Hispanic staff.

JET also maintains a very close relationship with the Jonesboro-based Hispanic Community Services, Incorporated. HCSI's current Executive Director is a member of JET's Community Advisory Board. Moreover, in the past HSCI has provided Spanish language translation for JET promotional materials and remains very willing to provide translation services to assist JET personnel serve Spanish speaking riders.

Also, Jonesboro is the home to Arkansas State University's flagship campus. For much of the past decade, 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. Soon A-State will also open up a satellite campus in Mexico which should bring International students whose native language is Spanish.

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

Moreover, most of A-State's International Students have very good English skills and the University prefers that they use English as they conduct their everyday lives in Jonesboro. JET 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. JET also has an agreement with the A-State Office of International Programs that allows JET to request assistance with translation for the general population. Moreover, JET management meets periodically with A-State administrative personnel and A-State International students to discuss JET's service.

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

This report was constructed using U.S. Census data obtained from the American Fact Finder, Tables S1601 (Language Spoken at Home, 2010-2014 American Community Survey 5-Year Estimates) and B 16001 (Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over, 2008-2012 American Community Survey 5-Year Estimates).

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

JET's maximum service area is defined by the city limits of Jonesboro, AR. Appendix1 (p. 26) contains a current JET system map showing the boundary of JET service area.

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

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.

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

Using the 89,719 respondents in the data, Jonesboro should have approximately 62,800 of that number. If all 1,953 of those 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, 1,816 persons are identified as "Speaks English less than very well". Of these 1,330 (73%) are Spanish speakers and 397 (22%) identify as speakers of Asian and Pacific Island languages.

#### 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 City of 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 have consistently indicated an ELL/LEP enrollment of less than 10% (JPS = 8.57%/NPS = 4.35%). Although Spanish is the predominant ELL language (JPS = 8.23% and NPS = 3.46%), these schools have reported up to nine different languages in any given year.

All 15 of the Jonesboro Public Schools and Nettleton Public Schools campuses are located within one-quarter mile of JETS Fixed Route system.

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

JET has current relationships with the following local institutions that provide specific 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 reported that for Spring 2016 semester they enrolled 84 English as a Second Language (ESL) students.

Valley View Adult Education Center reports that it served 76 ESL students for the School Year 2015-16.

For the year 2015, The Hispanic Community Services, Incorporated provided written translation services for 513 individuals and oral interpretations for 5,306 more. In that HCSI is a regional institution, not all of these individuals who were served reside in Jonesboro.

# 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, JET does not generally experience significant daily contact with the LEP population. This is especially true in regards to the use of JET transit services by the Hispanic community.

This reality that the Hispanic population in Jonesboro seldom rides JET transit continues to exist in spite of JET having taken extraordinary efforts to make our service more popular to the Hispanic community. Specifically, JET has produced transit materials in Spanish and located a stop that is 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, all of the Jonesboro Public Schools/Nettleton Public Schools campuses (all of which serve LEP students) have access to JET Fixed Route service within one-quarter mile of the campuses.

As an indication of how closely JET management collaborates with HCSI, JET annually supports the Hispanic Center's HUD application for CBDG funding to help fund its translation services. JET, as well, advertises in HCSI publications and participates in the annual Hispanic Festival held in early May each year. Additionally, the Executive Director of HCSI is one of seven members of the JET Community Advisory Board

JET Transit Director has also communicated with the A-State International Student community at least semi-annually. JET has also collaborated with instructors of International Students to familiarize them with JET Fixed Route buses via "Travel Training" and JET's management regularly attends A-State's International Students welcome events.

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

JET 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 JET Transit Director frequently exchange emails about the HCSI – JET relationship. While Valley View Adult Education Center does offer ESL classes to non-English speakers throughout the year, JETS Route 17 has a stop immediately in front of their facility. However, this stop does not usually record 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 6:15 p.m.

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

As has been explained earlier, JET intentionally and consistently proactive in engaging members of Jonesboro's LEP community via its relationships with HCSI, Arkansas State University's Office of International Programs, and the ESL programs at both the Jonesboro Public Schools and the Nettleton Public Schools. JET also provides HCSI information about its planning activities that HCSI includes in its monthly newsletter to Hispanics.

JET also makes use of recently developed technologies to disseminate information about and to encourage participation in its planning activities. Notices of planning meetings are posted on JET Website. Email notices publicizing these events have been sent to a diverse group of local organizations. The following agencies have been notified of upcoming JET 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
East Arkansas Planning and Development District
Hispanic Community Services Incorporated
Jonesboro Urban Renewal and Housing Authority
Jonesboro Regional Public Library
St. Bernards Senior Center
The Learning Center
The Mall at Turtle Creek
Valley View Adult Education Center

JET 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.

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

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

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

Of these two, it is on JET Fixed Route Service, with its larger ridership, where negative consequences will most frequently occur if JET is not prepared to minimize language challenges for the LEP population. If JET staff 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 JET Fixed Route LEP riders. In the event that a JET driver needed to provide emergency evacuation instructions or information pertinent to security awareness and/or emergency preparedness, passengers with limited English proficiency could be seriously disadvantaged, and possibly even to a lifethreatening degree.

Also, for JET 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 engage paratransit services could result in unnecessary "No Shows" and/or late cancellations that could jeopardize future eligibility 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, JET will endeavor to minimize the barriers that a rider having limited English language might encounter using JET's service. One specific way that this is being done involves JET installing Google Translate software on its Website to help mitigate the difficulty that LEP riders could experience in obtaining critical Fixed Route scheduling information. Additionally, with Spanish being the language most frequently used in this area by non-English speakers, JET has posted in its Regional Transfer Center information in Spanish about how to obtain assistance.

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

JET is very active in the Jonesboro community and it intentionally seeks opportunities to engage with community organizations, including those who generally serve the LEP population. For several years JET has maintained a strong relationship with Hispanic Community Services, Inc. (HCSI), a local non-profit that exists to assist in the integration of the Hispanic community. JET and HCSI also cooperate often throughout the year to promote both open dialogue between JET and the Hispanic community and mutually beneficial activities.

JET 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 meetings attract citizens in each of these City Council election districts who have concerns about public issues. While many of the attendees to these ward meetings do not come primarily to address public transportation issues, they are availed of an opportunity to participate in discussions concerning public transportation in their wards. JET's presence provides an opportunity that most would not have planned to receive. However, these ward meetings are not generally well-attended by LEP members of the community.

Goals established by JET 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 t low-income and minority members of the community.
- Provide effective means to obtain 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, the Internet, and social media.
- 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 distinct majority of the relatively small LEP population residing in Jonesboro, developing an effective means of reaching the Hispanic community (primarily through the offices of HCSI) with transportation planning information will provide contact with a significant percentage of Jonesboro's LEP population.

Although JET 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. However, JET will continue to be sensitive to developments within its LEP population and intentionally 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, JET is currently engaged in:

- Working with the Hispanic Community Services, Incorporated to link a new JETS website 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 JET staff and LEP individuals is rather infrequent, JETS personnel will not be allowed to assume that this pattern will continue to exist. Therefore, JET includes training sessions to prepare staff 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 just being fluent in "Arkansaw" is not sufficient. HCSI's Executive Director Gina Gomez has told JET that one of the most important factors in developing consistent Hispanic ridership is that they be made to feel wanted when they do finally decide to ride. JET staff is being trained to exhibit this behavior.

#### Task 4. Step 3: Analyze your budget.

JET 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 JET to devote a substantial portion of its budget to developing bi-lingual materials. However, JET will not be unresponsive to the needs of LEP individuals and it will meet opportunities to serve the LEP population with appropriate resources.

The use of Google translator technology will cost neither JET nor its patrons anything and will allow information that appears on JET's Website to be translated into a variety of languages. While JET 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 make available.

Definitely, capital budget increases for bi-lingual/multi-lingual signage inside of JET transit vehicles and facilities should be considered in the years beyond 2016.

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

JET will continue to collaborate with the community organizations listed in Task 1 so as to best serve the LEP population residing in Jonesboro. Such collaboration could provide:

- A more comprehensive service to the LEP community
- Assistance with translating both printed and on-line information
- Bi-lingual travel training for LEP populations
- Educational opportunities to help improve access to JET's transit services

#### **JET's Community Advisory Board**

Since its inception in 2005, JET has intentionally focused on developing a Community Advisory Board (CAB) that represented the diversity within the City of Jonesboro. The ordinance that created JET 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 JET's CAB has always been composed of both black and white women and men. At no time in JET history has the African-American representation on JET's 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 JET's CAB, when openings occur there JET and the Mayor of Jonesboro is committed to filling 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.

Just last year, JET was fortunate to be able to add a Hispanic woman to the CAB, thus adding even more to the diversity of the JET CAB. Gina Gomez is the Executive Director of the Hispanic Community services, Inc. and has long been a "friend" of JET. JET also is sensitive to the need to have a CAB member who has a personal understanding of ADA issues.

| Members Name                     | Ward Represented | Term Expires | Race/Gender             |
|----------------------------------|------------------|--------------|-------------------------|
| Kim Shumpert                     | 1                | 2/28/2017    | Caucasian/Female        |
| Roger McKinney                   | 2                | 2/28/2017    | African American/Male   |
| Robert Wells                     | 3                | 2/28/2018    | Caucasian/Male          |
| Lydia Parkey                     | 4                | 2/28/2018    | Caucasian/Female        |
| Reverend Charlene Johnson, Chair | 5                | 2/28/2018    | African American/Female |
| Rickey Greer, Vice Chair         | 6                | 2/28/2019    | African American/Male   |
| Gina Gomez                       | At Large         | 2/28/2019    | Hispanic/Female         |



### JETS Monitoring of Sub-Recipient Compliance with Title VI

## JETS does not have any subrecipients.



#### **JETS Equity Analysis for Title VI**

In 2015 JET constructed a Regional Transfer Center to facilitate connectivity for JET's riders moving from one part of the city to another and to serve other regional public transit agencies, public and private.

This facility was constructed with Section 5307 funding and the Local Match was the value of the City of Jonesboro-owned land on which the facility was constructed.

A Region VI-reviewed procurement was conducted for this project.



#### 2016 Title VI Service Standard Report

#### **JET Vehicle Load for 2015**

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

#### **JET Vehicle Headway for 2015**

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.

For most of 2015, JET operated its Fixed Route service with four (4) lines with 30 minute headways and one (1) line with a 60 minute headway. In late October 2015, JET changed its Fixed Route service to three (3) lines with 30 minute headways, one (1) line with a 40 minute headway, and one (1) line with a 60 minute headway.

#### **JET On-Time Average for 2015**

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.

JET 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 Arrival Performance" for 2015 was 86%. The "On-Time Departure Performance" percentage was 79% and the Departure On-Time percentage was 83%.

#### **JET Service Availability for 2015**

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.

JET 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 JET service to areas with low income housing. Also, a review of the location of JET bus stops indicate that they generally are between .13 miles and .36 miles apart in those residential areas that are most "transit needy". Consult Appendix 1 for a current map of JET Fixed Routes showing each bus stoplocation.

It is worth noting that Jonesboro is Arkansas' second largest city in land mass, encompassing some 80 square miles. Additionally, Jonesboro's population density is less than 900 per square mile. Accordingly, there are several areas of the city that does not have the population density to support a Fixed Route and other areas of the city where the per capita income is high enough to make offering a transit route uneconomical.

JET 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).

.

#### **JET Title VI SERVICE POLICIES**

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

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

- Transit Amenities
- Vehicle Assignment

#### Transit Amenities

JET has two types of transit amenities: a Regional Central Center (RTC) and bus shelters. The RTC was completed in October 2015 and was intentionally situated in the virtual geographic center of the City of Jonesboro. From its site, as a transfer facility, the RTC serves to help efficiently facilitate the travel of its riders from their origins to their destinations With Jonesboro being comprised of over 80 square miles, the RTC helps to expedite travel from some of Jonesboro's most transportation needy neighborhoods to the portions of the city where most of these residents are employed.

Additional transit amenities are transit shelters at 24 of JET's stops. These shelters are distributed equitably throughout JET's service area. The location of these shelters is based on 1. boarding levels, 2. the proximity to major landmarks such as commercial or employment centers, and 3. the needs of special populations (i.e. senior communities, near dorms at the university, etc.).

#### **Vehicle Assignment**

On a daily basis, JET's Route Coordinators randomly assigned a bus to each of JET's five Fixed Routes. Every JET driver in Fixed Route service must be completely familiar with, and able to drive the medium cutaway style of bus that JET uses.

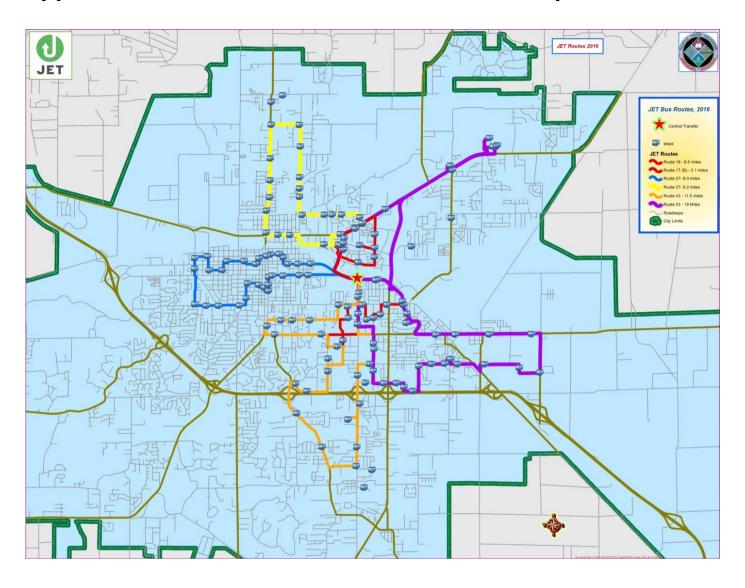
All JET Fixed Route buses in revenue service are 100% handicap accessible. The fleet consists of medium cutaway conventionally fueled buses used for fixed and special express routes. All vehicles have air conditioning units and are equipped with wheelchair lifts. All vehicles are cleaned and maintained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



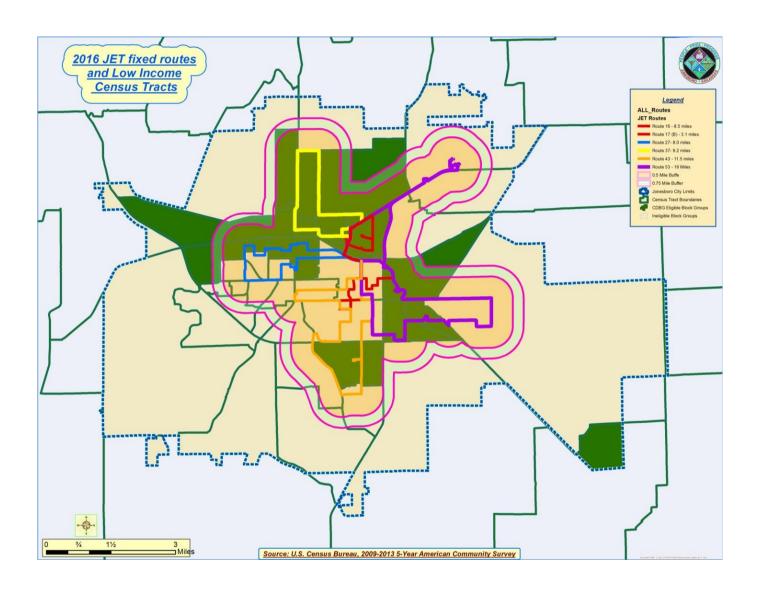
# **Appendices**

|          | x 1-JETS 2016 Fixed Route Map (current)  | . 26 |
|----------|--|------|
| Appendi  | x 2-JETS 2016 Fixed Route Map Layered on Low-Income Census Tract Map with .5 and .75 mile buffers    | . 27 |
| Appendix | 3 – Jonesboro Public Schools and Nettleton Public Schools That Are Proximate to JETY's Fixed Routers | . 28 |
| Appendi  | x 3 – Jonesboro City Council Minutes (3/15/14)<br>Including Approval of JET 2016 Title VI<br>Program | . 29 |

## **Appendix 1 – JET 2016 Fixed Route Transit Map**



# **Appendix 2 – 2016 JET Fixed Routes and Low Income Neighborhood Census Data Map**



### Appendix 4

### Jonesboro and Nettleton Campuses That Are Proximate to JETS Fixed Routes

| Campus                                  | School District | JET Route |
|---|-----------------|-----------|
| Math/Science                            | JPS             | Route 37  |
| Micro-Society                           | JPS             | Route 27  |
| University Heights Elementary           | NPS             | Route 53  |
| Kindergarten Center                     | JPS             | Route 27  |
| Fox Meadow Elementary                   | NPS             | Route 43  |
| Nettleton Junior High/High School       | NPS             | Route 53  |
| Douglas MacArthur Junior High           | JPS             | Route 43  |
| Annie Camp Junior High                  | JPS             | Route 27  |
| Health Wellness & Environmental Studies | s JPS           | Route 27  |
| Nettleton Intermediate Center           | NPS             | Route 53  |
| Fox Meadow Intermediate Center          | NPS             | Route 43  |
| Visual Performing Arts                  | JPS             | Route 43  |
| Jonesboro High School                   | JPS             | Route 27  |
| International Studies                   | JPS             | Route 27  |
| Nettleton Middle School                 | NPS             | Route 53  |

#### RESOLUTION APPROVING THE TITLE VI PROGRAM SUBMITTED FOR THE JET SYSTEM

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

Whereas, as a funding requirement, JET 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 2016 Title VI Program for the JET 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.