

# Language Assistance Plan

## Plan Components

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As a recipient of federal US DOT funding, the City of Janesville is required to take reasonable steps to ensure meaningful access to our programs and activities by limited-English proficient (LEP) persons.

Limited English Proficient (LEP) refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak or understand English. This includes those who have reported to the U.S. Census that they speak English less than very well, not well, or not at all.

The City of Janesville's Language Assistance Plan includes the following elements:

1. The results of the *Four Factor Analysis*, including a description of the LEP population(s), served.
2. A description of how language assistance services are provided by language
3. A description of how LEP persons are informed of the availability of language assistance service
4. A description of how the language assistance plan is monitored and updated
5. A description of how employees are trained to provide language assistance to LEP persons
6. Additional information deemed necessary

## Methodology

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To determine if an individual is entitled to language assistance and what specific services are appropriate, the City of Janesville has conducted a *Four Factor Analysis*<sup>1</sup> of the following areas: 1) Demography, 2) Frequency, 3) Importance and 4) Resources and Costs.

LEP *Four Factor Analysis*

**Factor 1: Demography:** Identifies the number or proportion of LEP persons served and the languages spoken in the service area.

The first factor of the *Four Factor Analysis* is the basis of the Language Assistance Plan. It requires the City of Janesville to review its US Census data to determine if it meets the *LEP Safe Harbor Threshold*.

### US Census Data<sup>2</sup>

The City of Janesville did the following:

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<sup>1</sup> DOT LEP guidance <https://www.transportation.gov/civil-rights/civil-rights-awareness-enforcement/dots-lep-guidance>

<sup>2</sup> US Census data collected from NHGIS: <https://data2.nhgis.org/main>

1. Inserted a table of the 2011-2015 American Community Survey estimates for Limited English Proficiency within the Janesville Area MPO. This data was found at NHGIS <https://data2.nhgis.org/main>. The same information is available at the County level from the WisDOT website <https://wisconsin.gov/Pages/doing-bus/local-gov/astnce-pgms/transit/compliance/title6.aspx>.
2. Analyzed the LEP demographic data for the Janesville Area MPO Area by calculating the *Safe Harbor Threshold* for the top twelve largest language groups other than English.
  - a. The *Safe Harbor Threshold* is calculated by dividing the population estimate for a language group that “Speaks English less than very well” by the total population of the county.
    - i. The *LEP Safe Harbor Threshold* provision stipulates that for each LEP group that meets the LEP language threshold (5% or 1,000 individuals, whichever is less, of the population to be served) the Janesville Transit System must provide translation of vital documents in written format for the non-English users.
      1. Examples of written translation of vital documents include the Nondiscrimination policy statement (Appendix 2), Complaint Procedure (Appendix 3), Complaint Form (Appendix 4), and ADA paratransit eligibility forms.
3. Explained the results of the analysis of the county LEP data in the demographic section of the *Four Factor Analysis*.

**Factor 2: Frequency:** Identifies the frequency staff encounters LEP persons.

LEP persons are persons identified as speaking English less than very well, not well or not at all. Just because a person speaks a language other than English doesn't mean they don't speak English or are identified as LEP.

The summary below discusses the frequency with which Janesville Transit System staff encounter LEP persons. It also provides information on the how staff is instructed to meet the needs of LEP persons. Janesville Transit System staff persons are encouraged to use LEP resource materials to assist LEP persons.

**Factor 3: Importance:** Explains how the program, service or activity affects people's lives.

The summary below discusses how the Janesville Transit System program and services impact the lives of persons within the community. The Janesville Transit System will specify the community organizations that serve LEP persons, if available.

**Factor 4: Resources and Costs:** Discusses funding and other resources available for LEP outreach.

The summary below discusses the low-cost methods the Janesville Transit System uses to provide outreach to LEP persons as well as train staff on Title VI/ADA and LEP principles.

### Additional Required Elements

In addition to the *Four Factor Analysis (listed below as item #1)*, the Janesville Transit System addresses the following elements:

**Item #2:** A description of how language assistance services are provided by language

- Item #3:** A description of how LEP persons are informed of the availability of language assistance service
- Item #4:** A description of how the language assistance plan is monitored and updated
- Item #5:** A description of how employees are trained to provide language assistance to LEP persons

# Summary of the Language Assistance Plan Components

## Factor 1 – Demography

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### Demography

A demographic analysis was conducted for the Janesville Metropolitan Planning Area<sup>3</sup> to determine the populations and languages that are spoken throughout the area with limited English proficiency ('less than very well'). The data was acquired from the U.S. Census Bureau American Community Survey (ACS) 5-year data (2011-2015), the last year to provide highly detailed language breakdowns for the Janesville Area. Table 1 shows the twelve most common non-English languages spoken, the number and percent of the total population for each of those language groups, and a breakdown of which language groups had the highest proportion of limited-English proficiency among all limited-English proficiency populations.

The Safe Harbor Threshold is calculated by dividing the population estimate for a language group that “speaks English less than very well” by the total population of the county. The LEP Safe Harbor Threshold provision stipulates that for each LEP group that meets the LEP language threshold (5% or 1,000 individuals, whichever is less), JTS must provide translation of vital documents in written format for non-English speaking persons. For other non-English speakers, oral interpretation services are available upon request.

In the Janesville MPO, with a 2011-15 population estimate of 76,112 persons, 1058 individuals were estimated to be Spanish speakers who spoke English ‘less than well’<sup>4</sup>. This number is approximately 1.4% of the total population and below the 5% threshold but over the 1,000-person threshold. No other language group had more than 150 individuals, or about .2% of the total population, with the ability to speak English ‘less than well’.

Based on this analysis, JTS is required to provide written translation of vital documents into the Spanish language. In the future, if the Janesville MPA meets the Safe Harbor Threshold for any additional language groups, it will provide written translation of vital documents in such languages and also consider additional measures needed for oral interpretation.

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<sup>3</sup> The Janesville Metropolitan Planning Area includes Rock County Census Tracts (2010) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12.01, 12.02, 13.02, 13.03, 13.04, 14 and 31. While these tracts include some area that is outside of the JTS service area and MPO Boundary, they are the smallest geography that include all areas within the MPO boundary and JTS service area at the Census tract level.

<sup>4</sup> Data from the 2016-2020 ACS estimates that 2377 individuals were Spanish language speakers and 1,054 individuals were Spanish language speakers who spoke English “less than very well”.

**Table 1: Analysis of Limited English Proficiency Population**

Janesville Metropolitan Planning Area (ACS 2011-2015)	Total Number of Language Speakers	Proportion of Total Population	Proportion of Total Non-English speakers who speak English 'less than very well'
Total Estimated Population	76112		
Total Non-English Speakers	4394	5.77%	
English 'less than very well'	1420	1.87%	100.00%
Spanish	2763	3.63%	
English 'less than very well'	1058	1.39%	74.51%
Germanic Languages	382	0.50%	
English 'less than very well'	34	0.04%	2.39%
Mon-Khmer, Cambodian	340	0.45%	
English 'less than very well'	142	0.19%	10.00%
Chinese	141	0.19%	
English 'less than very well'	52	0.07%	3.66%
Indic Languages (Gujarati, Hindi, Urdu, and Other)	119	0.16%	
English 'less than very well'	21	0.03%	1.48%
French	112	0.15%	
English 'less than very well'	0	0.00%	0.00%
Serbo-Croatian	85	0.11%	
English 'less than very well'	0	0.00%	0.00%
Tagalog	58	0.08%	
English 'less than very well'	20	0.03%	1.41%
African	58	0.08%	
English 'less than very well'	8	0.01%	0.56%
Russian	51	0.07%	
English 'less than very well'	16	0.02%	1.13%
Polish	51	0.07%	
English 'less than very well'	0	0.00%	0.00%
Arabic	45	0.06%	
English 'less than very well'	14	0.02%	0.99%

Factor 2 – Frequency

The City of Janesville and JTS are trained on what to do when they encounter a person with limited English proficiency. JTS and the Janesville Area MPO track the number of encounters with LEP individuals and document phone inquiries or office visits using a log similar to the example provided below.

**Example Log of LEP Encounters**

Date	Time	Language Spoken By Individual (if available)	Name and Phone Number of Individual (if available)	Service Requested	Follow Up Required	Staff Member Providing Assistance	Notes

Since implementing the LEP Log, JTS has received five requests for interpretation. All five were Spanish language speakers seeking bus route information. Services were provided over the phone using a third-party translation service, and translated program documents. Approximately three percent of riders are LEP persons, according to ridership surveys conducted as part of the 2019 Transportation Development Program<sup>5</sup>.

JTS has an open-door policy and will provide rides to any person who requests a ride. If an individual has speech limitations, the dispatcher or driver will work with the Transit Director and the City of Janesville to ensure the individual receives access to the transportation service.

The “I Speak” Language Identification Card shown below is a document that can be placed in JTS vehicles and used by the City of Janesville staff to assist LEP individuals. Additional languages can be added as needed to match the demographic changes of the City of Janesville’s service area. Note: For additional languages visit the US Census Bureau website <http://www.lep.gov/ISpeakCards2004.pdf>

<b>“I Speak” Language Identification Chart</b>	<b>Language</b>
I speak English	English
Yo hablo español	Spanish
ខ្ញុំនិយាយភាសាខ្មែរ khnhom niyeay pheasaeakhmer	Cambodian
Kug has lug Moob	Hmong
我說中文	Chinese
E nói tiếng Việt	Vietnamese
나는한국어를	Korean
Marunong akong mag-Tagalog	Tagalog
Ich spreche Deutsch	German
Я говорю по-русски	Russian
Ja говорим српски	Serbian

<sup>5</sup> Formal ridership data has not been collected since 2012 and is only collected as part of the triennial Transportation Development Program

में हिंदी बोलते हैं	Hindi
میں نے اردو بولتے ہیں	Urdu

### **Factor 3 – Importance**

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The City of Janesville and the Janesville Transit System (JTS) understand a person with limited English proficiency faces difficulties obtaining health care, education, access to employment and meal sites, recreational services, and other activities vital to well-being. Providing a fixed-route public transportation system with a level of service that provides access to these essential places is important to the health and well-being of residents as well as addressing issues of social and economic justice.

### **Factor 4 – Resources and Costs**

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The City of Janesville and Janesville Transit System does not have a separate budget for LEP outreach. Despite this JTS along with the Janesville Area MPO continue to explore ways to implement low-cost methods of notifying LEP persons of transportation services. Outreach efforts include maintaining a website, utilizing social media, developing and printing brochure/materials, and having a visible presence in our community (e.g. buses on Janesville streets, participating in job fairs, parades, community events, etc.) to promote transportation services.

Additional outreach methods to reach LEP communities include but are not limited to activities such as providing transit information at ethnic stores/markets; the Janesville senior center; and Hedberg library. The cost is relatively low while the reach to the LEP population is high.

## ***Language Assistance Plan Details***

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### Provision of Language Assistance Services

When encountering LEP persons directly, Janesville Transit System staff use the “I Speak” Language Identification Card or posters to identify the language and communication need of LEP persons.

The Janesville Transit System has a bilingual Spanish-speaking person on staff. The City of Janesville has also developed relationships with language teachers in area schools as well as local community leaders to use a resource to assist in meeting the need of LEP persons, if needed.

JTS does the following to inform LEP persons of the availability of language assistance services:

- ✓ Review outreach activities and the frequency of contact with LEP individuals to determine whether additional language assistance services are needed.
- ✓ Utilize Wisconsin Relay 7-1-1, the state of Wisconsin resource to assist with communication needs <http://www.wisconsinrelay.com/> and <http://www.wisconsinrelay.com/features>.
- ✓ Purchase translation services for phone call communication (Language Line) as needed.
- ✓ Purchase translation services for written documents as needed.

### Language Assistance Plan Monitoring and Updates

The City of Janesville ensures Title VI-ADA requirements are met. The City of Janesville’s documents updates and reviews to its Title VI and ADA Transition Plan.

On an ongoing basis, the City of Janesville assesses changes in demographics, types of services, and other rider needs. This review assesses the effectiveness of the LEP policies and procedures, including but not limited to mechanisms for securing interpretive services, equipment used for the delivery of language assistance, complaints filed by LEP person, needs identified through community outreach activities and routine feedback from direct-service staff.

The City of Janesville will evaluate the information collected to determine if adjustments should be made to the delivering of programs and services to ensure meaningful access to minority and LEP persons. JTS and the Janesville Area MPO will also discuss the JTS Title VI/ADA and Language Assistance Plan compliance requirements on an as-needed basis.

### Employee Training for LAP and Title VI

JTS employees are trained on the principles of Title VI/ADA and the Language Assistance Plan. New employees will be provided guidance on the needs of clients served and how best to meet their needs.

The City of Janesville will ensure that JTS, as applicable educates its staff on Title VI and ADA requirements, specifically complaint procedures and LEP provisions. If a driver, dispatcher or employee needs further assistance related to LEP individuals, they will work with JTS’s Transit Director to identify necessary actions (immediate, short-term and long-term) designed to best meet the language needs of the participants of the program or service.