



## **Title VI and LEP Plan**

April 2017

950 Elm Street  
Dubuque, IA 52001  
[www.JuleTransit.org](http://www.JuleTransit.org)

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## INTRODUCTION

The purpose of this document is to ensure that transit services operated in the City of Dubuque, Iowa are in compliance with the FTA Circular 4702.1B and Title VI of the Civil Rights Act of 1964 and all related acts and statutes:

“No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance.”

With specific regard to public transit services, this document ensures that:

1. FTA-assisted benefits and related services are made available and are equitably distributed without regard to age, color, disability, national origin, race, sex, other;
2. That the level and quality of FTA-assisted public transit services are sufficient to provide equal access and mobility to any person without regard to age, color, disability, national origin, race, sex, other;
3. That opportunities to participate in the transit planning and decision-making processes are provided to persons without regard to age, color, disability, national origin, race, sex, other;
4. That decisions on the location of transit services and facilities are made without regard to age, color, disability, national origin, race, sex, other; and

That corrective and remedial action will be taken if necessary to prevent discriminatory treatment based on age, color, disability, national origin, race, sex and other locally protected classes.

## SYSTEM OVERVIEW, STANDARDS AND POLICIES

The Jule provides both fixed-route and paratransit service in the City of Dubuque and paratransit in the City of East Dubuque with 16 fixed route, 13 paratransit vehicles and 2 trolleys (30 total vehicles). Regular service is provided Monday through Saturday. The Jule does not designate peak service hours.

### Vehicle Load Standards

Vehicle Type	Average Passenger Capacities		
	Seated	Standing	Total
Trolley	21	20	41
Minibus	16	0	16
Sprinter	9	0	9
Medium Duty	32	10	42
Heavy Duty (Low Floor)	32	51	83

### Vehicle Headway Standards

Weekday	Weekday			Saturday		
	Day	Evening	Night	Day	Evening	Night
Express/Crosstown	15	--	--	30	--	--
Business Shuttle	15	--	--	--	--	--
Downtown Hub Routes	60	60	--	60	60	--
Midtown Hub Routes	60	60	--	60	60	--
West-end Hub Routes	30	30	--	30	30	--
Nightrider	--	30	30	--	30	30

Day: 6am-6pm

Evening: 6pm-9pm

Night: 9pm-2:40am

“--” means no service provided

**On-Time Performance Standards**

Ninety-five (95) percent of The Jule’s transit vehicles will complete their established runs no more than 2 minutes early or 5 minutes late in comparison to the established schedule/published timetables.

**Service Availability Standards**

The Jule will distribute transit service so that at least 75% of all residents in the service area are within a ¼ mile walk of bus service. Bus stops will not be less than 2 blocks or more than 4 blocks apart with the exception of the non-stop express crosstown service which stops only at the downtown and west-end transfer areas.

**Vehicle Assignment Policy**

Vehicles will be assigned to the Downtown, Midtown and West-End Hubs such that the average age of the fleet serving each depot does not exceed 7 years. Low-floor buses are deployed on frequent service and other high-ridership lines, so these buses carry a higher share of ridership than their numerical proportion of the overall bus fleet.

All vehicles are equipped with air conditioning and all fixed-route vehicles are outfitted with automated stop announcement systems and interior LED signs.

Bus assignments take into account the operating characteristics of buses of various lengths, which are matched to the operating characteristics of the route. Local routes with lower ridership may be assigned 32-foot buses rather than the 35-foot buses. Some routes requiring tight turns on narrow streets are operated with 32-foot rather than 35-foot buses.

**Transit Amenities Policy**

Installation of transit amenities along bus routes are based on the number of passenger boardings at stops and stations along those routes. In areas with significant populations of elderly or disabled residents, benches and seating amenities are considered regardless of current ridership.

**Subrecipients**

The Jule does not pass funds through to subrecipients.

**Transit Advisory Board**

The Jule is advised by the City of Dubuque Transit Advisory Board (TAB). The TAB is an appointed body for which interested parties submit applications to the city council and are appointed by a majority vote of the elected council. The membership of this advisory body is provided below.

<b>Body</b>	<b>Caucasian</b>	<b>Latino</b>	<b>African American</b>	<b>Asian American</b>	<b>Native American</b>
Population	93.4%	2.3%	3.2%	1.4%	0.2%
Transit Advisory Board	80%	20%	0%	0%	0%

Information on boards and commissions including where to apply is posted on City website (which has a translate tool for all major languages), posted on the city hall bulletin board, news releases are published semiannually, information is displayed on scrolling outdoor signage at public facilities (all in the downtown and most racially diverse area), and public access television.

## PUBLIC PARTICIPATION

Public participation procedures are established to allow and encourage participation in The Jule's service area and include low income and minority individuals and those with Limited English Proficient (LEP).

This document outlines procedures to provide opportunities for all citizens to participate in the development of Dubuque Metropolitan Area Transportation Study's (DMATS) Passenger Transportation Plan (PTP) in which The Jule participates with other transportation services, both public and private, in the City of Dubuque. The PTP is a short-range plan that analyzes all aspects of transit operations and is required by the Iowa Department of Transportation (IA DOT). The PTP and its annual update is approved by the DMATS Policy Board, and follows all open meeting requirements for approval and public hearings.

Public participation regarding the PTP began in 2007 with focus groups and interviews with transportation stakeholders, surveys, review of local plans, participation in regional transportation planning sessions, and the gathering of background information. Information is gathered annually from these organizations to update the PTP and many of the organizations listed below attend quarterly meetings of the Transit Action Group to voice concerns and discuss transit needs.

The following organizations are members of the Transit Action group and provided guidance and comments on the PTP:

AARP	Dubuque Veteran's Association	Paramount EMS
Advanced Medical Transport	DuRide	Promise Jobs/Iowa Workforce Dev
American Cancer Society	ECIA Transportation Dept.	RTA
Area Residential Care	ENR Taxi	Scenic Valley Area Agency on Aging
City of Dubuque Housing	Four Oaks Parents as Teachers	Starlight Taxi Company
Coast to Coast	Goodwill Industries	The Jule
Crescent Community Health Center	Hillcrest Mental Health Center	Burlington Trailways
Delaware County CPC	Hillcrest Wellness Center	Tri State Blind Society
Department of Human Services	Hills & Dales	Tri State Dialysis
Developing Alternative Choices	Jackson County CPC	United Way
Dubuque Area Chamber of Commerce	Northeast Iowa Community College	United We Ride
Dubuque Community Y	Operation New View	Vocational Rehabilitation
Dubuque County CPC	Operation New View Head Start	Western Dubuque School District

Review of local plans, including the Bi-Annual Transportation Needs Survey and Sustainable Dubuque were completed and relevant information incorporated. The Transportation Needs Survey was designed to address regional transit needs and form solutions on barriers to transit access, such as language barriers. Sustainable Dubuque is a planning process based on issues targeted by the community to incorporate the principles of environment and ecological integrity, economic prosperity, and social and cultural vibrancy.

The Jule is a voting member of the DMATS Technical Advisory Board. The Technical Advisory Board makes recommendations to DMATS Policy Board.

The DMATS Tech Board is comprised of but not limited to: local social and human service organizations, area transit directors, representatives from the Iowa, Illinois and Wisconsin Department of Transportation, City and Council government officials, and representatives from departments within the City of Dubuque.

DMATS, in conjunction with The Jule, continues to utilize its adopted Public Involvement Plan which targets special interest or advocacy groups representing unique users of the transportation system as well as groups involved in the growth and development of the area. The most recent DMATS Public Involvement Plan was adopted for FY 2017 and is updated annually.

## **TITLE VI PROGRAM SUMMARY**

### **Title VI Authorities**

Title VI of the 1964 Civil Rights Act provides that no person in the United States shall, on the grounds of race, color, national origin, age, disability or sex be excluded from participation in, be denied benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal assistance (23 CFR 200.9 and 49 CFR 21).

The Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of terms “programs or activities” to include all programs and activities of Federal Aid recipients, sub-recipients, and contractors, whether such programs and activities are federally assisted or not (Public Law 100-259 (S.557) March 22, 1988).

### **Coordinator Responsibilities**

The Transit Manager and the City of Dubuque Human Rights Director are responsible for ensuring the implementation and the day-to-day administration of the City of Dubuque’s Title VI Plan. The Human Rights Director will be responsible for investigating complaints only. The Transit Manager will be responsible for implementing, monitoring and ensuring the City’s compliance with Title VI regulations.

### **General Responsibilities**

#### A. Public Dissemination

The City of Dubuque will disseminate Title VI Program information to transit employees, sub-recipients, and contractors, as well as the general public. Public Dissemination will include posting of public statements, inclusion of Title VI language in contracts, and announcements of hearings and meetings in minority newspapers when determined necessary and when funding is available.

#### B. Prevention of Discrimination

Procedures will be implemented to detect and eliminate discrimination when found to exist, including, but not limited to, issues of accessibility of training to all qualified City employees, utilization of Minority/Women/Disadvantaged Business Enterprises (DBE) contractors, public improvement, and material acquisition. All complaints are confidential and may be made available to those assisting in an investigation.

#### C. Reporting

The Transit Manager at The Jule will be responsible for any reporting required by IA DOT/OPT and/or FTA.

#### D. Remedial Action

The City of Dubuque will actively pursue the prevention of any Title VI deficiencies or violations and will take the necessary steps to ensure compliance through a program review of the program administrative requirements. If irregularities occur in the administration of the program’s operation, procedures will be promptly implemented to resolve Title VI issues and reduce to writing remedial action agreed to be necessary, all within a period not to exceed 60 days.

IA DOT will be notified of any complaint filed at the City of Dubuque involving Title VI issues, as to any resolution.

## **TITLE VI PUBLIC NOTICE**

The statement below is posted in all bus shelters as part of the schedule poster. It is also posted on The Jule's website, on its own page which contains additional information about Title VI, the complaint process, a link to the plan and a link to download the complaint form.

The Jule is committed to a policy of non-discrimination in conduct of its business and to the delivery of equitable, accessible transportation services. It is The Jule's policy to utilize its best efforts to assure that no person shall, on the grounds of race, color, national origin, age, disability, sex, gender identity, religion or sexual orientation be excluded from participation in, be denied the benefits of or be subjected to discrimination under its program of transit service delivery and related benefits. Any person who believes that he or she has been subjected to discrimination under Title VI on a basis of race, color, national origin, age, disability, sex, gender identity, religion or sexual orientation may file a Title VI complaint with The Jule 180 days from the date of the alleged discrimination.

For more information on The Jule's nondiscrimination obligation or to file a Title VI complaint, contact:

City of Dubuque Transit Division – The Jule  
950 Elm Street  
Dubuque, IA 52001

## **TITLE VI COMPLAINT PROCEDURES**

### Applicability

The complaint procedures apply to the beneficiaries of The Jule's transit programs, activities, including but not limited to: the public, contractors, sub-contractors, consultants, employees, and other sub-recipients of federal and state funds.

### Eligibility

If any individual, group of individuals, or entity believes that they or any other program beneficiaries have been subjected to discrimination prohibited by Title VI nondiscrimination provision as a recipient of benefits and/or services, or on the grounds of age, race, color, national origin or sex, they may exercise the right to file a complaint with the City of Dubuque. The State of Iowa and City of Dubuque also provide protection for the following groups: creed, gender identity, religion and sexual orientation. Every effort will be made to resolve complaints informally at the agency, recipient and/or contractor level.

### Time Limitations on Filing Complaints

Complaints must be filed not later than 180 days after:

- The date of the alleged act of discrimination; or
- The date the person became aware of the alleged discrimination; or
- Where there has been a continuing course of discriminatory conduct.

Complaints must be in writing, and must be signed by the complainant and/or the complainants' representative. The complainant must set forth as fully as possible the facts and circumstances surrounding the claimed discrimination.

A Title VI complaint form is available at The Jule's offices during normal business hours and on The Jule website.

Title VI complaints may be filed with:

- City of Dubuque/The Jule
- Iowa Department of Transportation

- Federal Transit Administration
- U.S. Department of Transportation

In all situations, employees of The Jule must contact the Transit Manager immediately upon receipt of Title VI or related statutes complaints.

## **INTERNAL COMPLAINT PROCESS**

1. The Transit Manager acting as the Title VI Coordinator, along with the City of Dubuque's Human Rights Director, will review the complaint upon receipt to ensure that all information is provided, that the complaint meets the 180 day filing deadline and that it falls within the jurisdiction of the City.
2. The Transit Manager will then investigate the complaint. A copy of the investigation will be shared with the Human Rights Director, and if the determination is so made, a copy of the complaint will be forwarded to the City Attorney.
3. If the complaint warrants a full investigation, the complainant will be notified in writing by certified mail. This notice will name the investigator and/or investigating agency. The City of Dubuque/The Jule will also notify the Iowa Department of Transportation (IA DOT) Office of Employee Services/Civil Rights.
4. The party alleged to have acted in a discriminatory manner will also be notified by certified mail as to the complaint. This letter will also include the investigators name and will request that this party be available for an interview.
5. Any comments or recommendations from legal counsel will be reviewed by the Title VI Coordinator.
6. Once the City of Dubuque/The Jule is notified of the IA DOT Office of Employee Services/Civil Rights investigative report findings, the City will adopt a final resolution.
7. All parties will be properly notified of the outcome of the IA DOT Office of Employee Services/Civil Rights report.
8. If the complainant is not satisfied with the results of the investigation of the alleged discrimination practice(s), s/he shall be advised of their right to appeal IA DOT Office of Employee Services/Civil Rights decision. Appeals must be filed within 180 days after the City of Dubuque's final resolution. Unless new facts not previously considered came to light, reconsideration of the City's resolution will not be available.

## RECORD OF TITLE VI INVESTIGATIONS, COMPLAINTS, OR LAWSUITS

There are no active lawsuits or complaints alleging discrimination on the basis of race, color or national origin with respect to transit service provided by The Jule. The Jule has not had complaints filed with FTA.

The Jule has not been asked to take part in a state civil rights compliance review within this last year.

## TITLE VI COMPLAINT FORM

The Jule is committed to a policy of non-discrimination in conduct of its business and to the delivery of equitable, accessible transportation services. It is The Jule's policy to utilize its best efforts to assure that no person shall, on the grounds of race, color, national origin, age, disability, sex, gender identity, religion or sexual orientation be excluded from participation in, be denied the benefits of or be subjected to discrimination under its program of transit service delivery and related benefits. Any person who believes that he or she has been subjected to discrimination under Title VI on a basis of race, color, national origin, age, disability, sex, gender identity, religion or sexual orientation may file a Title VI complaint with The Jule with 180 days from the date of the alleged discrimination.

The following information is necessary to assist us in processing your complaint. If you require any assistance in completing this form, please contact The Jule Transit Office 563-589-4196. The completed form must be returned to The Jule Transit, 950 Elm Street, Dubuque, Iowa, 52001.

<b>NAME:</b>	<b>DAYTIME PHONE:</b>
<b>STREET ADDRESS:</b>	<b>CITY:</b>
<b>STATE:</b>	<b>ZIP CODE:</b>

Person discriminated against (if someone other than complainant):

Which of the following best describes the reason for the alleged discrimination?

- |  |  |
|--|--|
| <input type="checkbox"/> Race            | <input type="checkbox"/> Gender Identity*    |
| <input type="checkbox"/> National Origin | <input type="checkbox"/> Sexual Orientation* |
| <input type="checkbox"/> Color           | <input type="checkbox"/> Religion*           |
| <input type="checkbox"/> Disability      | <input type="checkbox"/> Creed*              |
| <input type="checkbox"/> Age             | <input type="checkbox"/> Other               |

\*In addition to federal law, Iowa law prohibits discrimination on the basis of creed, gender identity, religion and sexual orientation

Have you filed a complaint with any other federal, state, or local agencies regarding this incident?     Yes     No

If yes, list agency/agencies and contact information:

<b>AGENCY:</b>	<b>CONTACT NAME:</b>
	<b>PHONE NUMBER:</b>

<b>AGENCY:</b>	<b>CONTACT NAME:</b>
	<b>PHONE NUMBER:</b>

Describe the alleged discrimination incident. Provide the date, location, and names and titles of any individuals/employees involved. Explain what happened, whom you believe was responsible, and any other specific relevant information. Please use an additional sheet of paper if more space is required.

I affirm that I have read the above charge and it is true to the best of my knowledge.

Complainant's signature: \_\_\_\_\_

Printed name of complainant: \_\_\_\_\_

Please mail your completed form to: The Jule – Title VI Complaint, 950 Elm Street, Dubuque, IA 52001

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Office Use Only - Received by: \_\_\_\_\_ Date: \_\_\_\_\_

## LIMITED ENGLISH PROFICIENCY FOUR-FACTOR ANALYSIS

The Jule has conducted the following analysis to meet requirements under Title VI of the Civil Rights Act of 1964 and Executive Order 13166 – Improving Access to Services for Persons with Limited English Proficiency (hereinafter referred to as "LEP"). This Executive Order requires recipients of federal funding to take reasonable steps to improve access to services for persons with LEP. The following uses the Four Factor Analysis identified in the LEP Guidance.

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

Task 1, Step 1 – Number or proportion of LEP persons served or encountered in the eligible service population.

The Jule serves an increasingly diverse community. As the City of Dubuque continues its economic growth and development it attracts an increasingly diverse workforce. Through partnerships with the Multicultural Family Center, Presentation Lantern Center, and Marshall Islands Health Project, The Jule conducts outreach to non-English speaking residents.

*The 2015 American Community Survey Estimates "Language Spoken At Home" data is shown below. Data was not available at the municipality level, but the majority of the county's population resides in the city limits.*

Subject	Dubuque County, Iowa			
	Total		Percent of specified language speakers	
			Speak English "very well"	Speak English less than "very well"
	Estimate	Margin of Error	Estimate	Estimate
CITIZENS 18 YEARS AND OVER				
All citizens 5 years and over	89,953	+/-58	97.3%	2.7%
Speak only English	96.3%	+/-396	(X)	(X)
Speak a language other than English	3.7%	+/-399	62.6%	37.4%
Spanish or Spanish Creole	1.7%	+/-256	76.0%	24.0%
Other languages	2.0%	+/-150	51.6%	48.4%

*Based on this data, Dubuque County does not meet the 1,000 or 5% LEP persons threshold for any language or language(s) identified.*

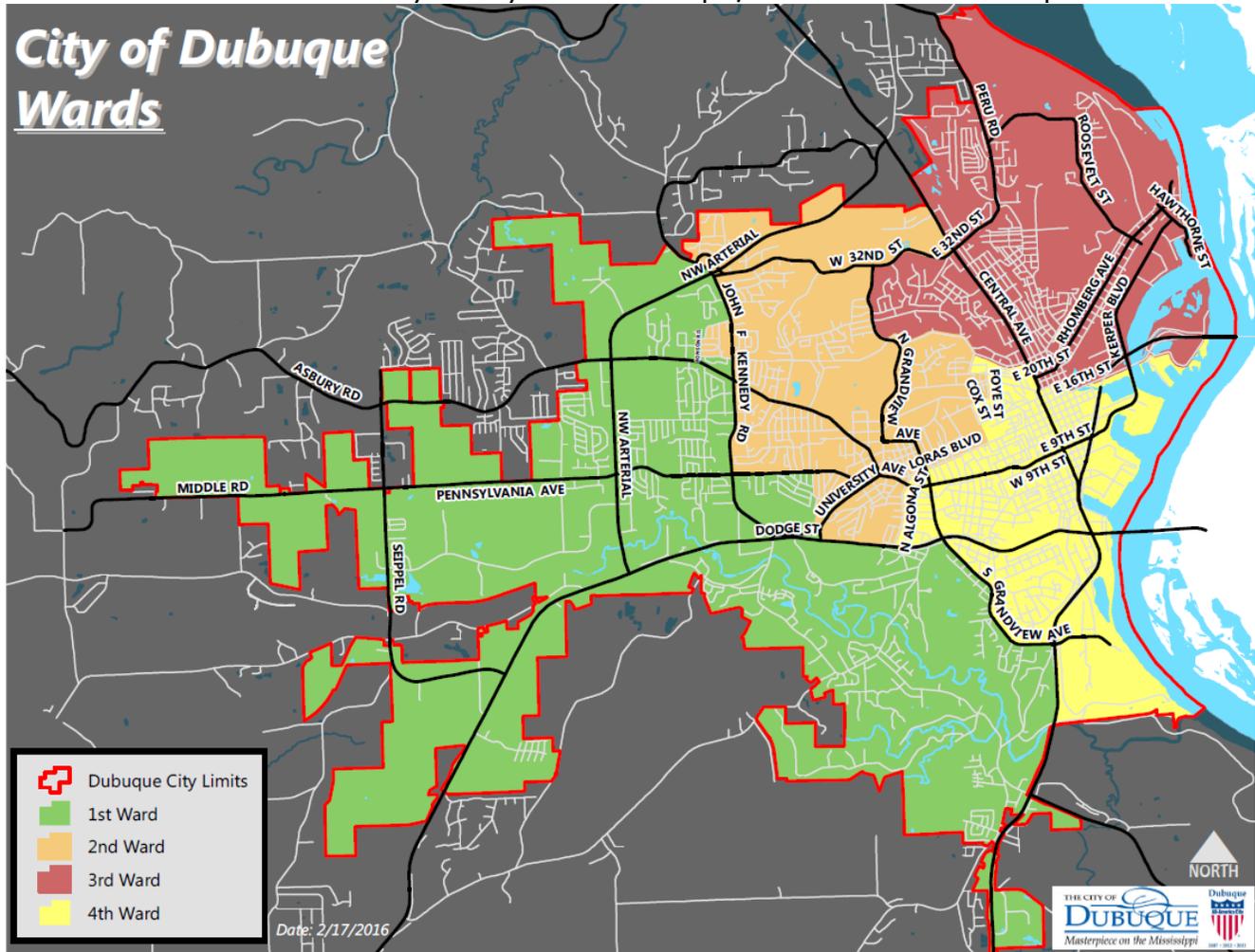
Task 1, Step 2 – Become familiar with data from the U. S. Census

According to the American Community Survey "DP05 Demographic and Housing Estimates" data, the estimated population for the urbanized area in 2015 was 58,409. The racial demographic breakdown for the city was estimated as follows:

Subject	Dubuque city, Iowa	
	Estimate	Percent
RACE		
One race	56,379	96.5%
White	53,111	90.9%
Black or African American	1,774	3.0%
American Indian and Alaska Native	88	0.2%
Asian	927	1.6%
Native Hawaiian and Other Pacific Islander	300	0.5%

Some other race	179	0.3%
Two or more races	2,030	3.5%
White and Black or African American	512	0.9%
White and American Indian and Alaska Native	1,092	1.9%
White and Asian	177	0.3%
Black or African American and American Indian and Alaska Native	35	0.1%
HISPANIC OR LATINO AND RACE		
Hispanic or Latino (of any race)	1,410	2.4%
Not Hispanic or Latino	56,999	97.6%

**Task 1, Step 2A** – Identify the geographic boundaries of the area that your agency serves  
The Jule service area is defined by the city limits of Dubuque, Iowa as shown in the map below.



**Task 1, Step 2B** – Obtain Census data on LEP populations in your service area  
In determining the number or proportion of LEP persons in Dubuque County, specifically that for the City of Dubuque, the 2011-2015 American Community Survey 5-Year Estimates were evaluated. According to 2015 estimates, of the 54,954 persons age 5 and older, 53,119 persons identified themselves as being “native” to the United States and 1,835 as foreign-born. Of the native-born persons, 292 reported speaking English less than “very well” and of the foreign-born persons, 656 also reported speaking English less than “very well”. The table below shows the language subgroups as follows:

**Persons in Dubuque, IA Who Reported Speaking English less than “Very Well”**

Language Spoken	Number of Persons	Percent of Total Population
Spanish	925	0.35%
Other Indo-European language	274	0.50%
Asian & Pacific Islander language	460	0.84%
Other languages	19	0.03%

Task 1, Step 2C – Analyze the data collected

According to the Census Data, the most commonly spoken language, other than English, is Spanish. In recent years Dubuque has seen an influx of multi-lingual persons, with the predominate languages – other than Spanish – being Marshallese and dialects of Hindu.

The Jule assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. This includes documenting phone inquiries and surveying vehicle operators. To date the transit agency staff have reported little contact with LEP persons.

There currently are no large concentrations of LEP persons in the Dubuque urbanized area.

Task 1, Step 3 – Consult state and local sources of data

In the 2016-2017 school year, the Dubuque Community School District (DCSD) provided 288 students with English as a Second Language (ESL) services. This number of students who receive ESL services accounts for 2.7% of all students enrolled in the DCSD. This student percentage is almost 1% higher than the overall percentage of Dubuque adults who reported speaking English less than “very well.”

Task 1, Step 4 – Community organizations that serve LEP persons

The Jule has current associations with local businesses, the Dubuque Community School District, Dubuque’s Multicultural Family Center, Marshall Islands Health Project, Northeast Iowa Community College, Loras College, University of Dubuque and Clarke College. All of the organizations provide service to LEP persons.

The Jule has developed a working relationship with the Multicultural Center and Marshall Islands health Project as well as the area colleges and universities. They assist to distribute transit system information to LEP persons through information areas onsite and transit information and input sessions that occur on a monthly or quarterly or annual basis as requested.

Task 1, Step 4C – Obtain information

The Jule will continue to reach out to LEP persons and organizations working with LEP persons in order to gather relevant information and to provide transit information.

**Factor 2:** Frequency with which LEP individuals come into contact with transit programs, activities and services

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

The Jule provides service on 13 regular routes from 6:05am until 9:00pm weekdays and from 8:05am-9:00pm on Saturdays. Late evening services are provided on four routes operating Friday and Saturdays evenings from 9:00pm to 2:40am during the college school year. There is no fixed route service on Sunday. The Jule also operates complementary paratransit and elderly (must be age 65 and older) service during the same business hours. The Jule operates from three (3) different transfer points: Downtown (9<sup>th</sup> & Elm Street), Midtown (Delhi & Grandview) and West End (JFK Circle).

### Fixed Route Fare Structure:

Fare Type	Single-Ride Fare
Single-Ride Full Fare	\$1.50
Single-Ride Half Fare*	\$0.75
Monthly Unlimited Ride Pass	Full Fare \$45.00 Half Fare* \$22.50
11-Ride Punch Card	Full Fare \$15.00 Half Fare* \$7.50
Single-Ride Youth (6 – 18 years)	\$0.75
Single-Ride Youth (5 years and under)	FREE with adult
Annual Youth Pass	(11-18 years) \$10.00 (6-10 years) FREE
College Students	FREE with Student ID

\*\* Half-Fare eligibility is defined for individuals aged 65+ with a photo ID and/or disabled residents showing a Medicare card

There is no cost for transfers on any of the routes. The Business Shuttle and the downtown Trolley are free-fare routes.

### Minibus/Paratransit Fare Structure

Minibus service is available to ADA-eligible persons and seniors:

Fare Type	Single-Ride Fare
Single-Ride Fare	\$3.00
10-Ride Punch Card	\$30.00

All of The Jule's buses, both fixed route and mini-bus service, are lift- or ramp-equipped and are fully accessible.

#### Task 2, Step 2 – Review information obtained from community organizations

Through on-going interviews and planning sessions The Jule has discovered that most community organizations seek more effective transit services for the populations they service, as they would then have better access to jobs, health care services, education and day care. They do not report many LEP-related issues.

#### Task 2, Step 3 – Consult directly with LEP persons

LEP persons are consulted throughout the planning processes

**Factor 3:** Assess the nature and importance of the program, activity, or service provided by the program

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

Using public transportation is important to LEP persons as indicated from discussions with local groups (especially the colleges and university). The Jule's more critical services include:

- Fixed route service
- Paratransit/elderly (aka mini-bus) service
- Coordination with the other public transit agency (Regional Transit Authority or RTA) in the urbanized area

If limited English is a barrier to using these services then the consequences for the individual are serious, and include limited access to obtaining health care, education and/or employment. Critical information from The Jule, which can affect access includes:

- Route and schedule information
- Fare and payment information
- System rules and policies
- Information about how to ride
- Public service announcements
- Safety and security
- Complaint forms
- Communication related to transit planning
- Information regarding paratransit/elderly services

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

The Jule has collaborated with Mercy Hospital on the Marshall Islands Health Project to address potential language barriers for transit access to medical appointments.

**Factor 4:** Assessing the resources available to the recipient and costs

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

The Jule provides the following language assistance measures to-date:

- Multilingual telephone service during business hours
- Identified employees that speak a language other than English
- Transit information translated into one (1) language on website
- Transit information provided through Google Maps which can be viewed in multiple languages.

The Jule contracts with LanguageLink for translation telephone service. The service provides immediate access to interpreters of over 240 languages during all service hours. All calls are confidential, secure, and in compliance with all federal LEP guidelines. To-date this service has not yet needed to be accessed.

Current and incoming employees will be trained on the policies and procedures of the language assistance program. Staff will also be retrained/reminded annually. Bi-monthly staff meetings are held for all drivers and dispatch staff (as appropriate) and the LEP tools are presented during one of the fall meetings.

Task 4, Step 3 – Analyze your budget

Like most public transit agencies The Jule's budget is constrained by several factors along with availability of staff resources. Devoting more resources to printing, webpage design, signage and additional administrative costs have been requested in future transit budgets.

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

The Jule will continue to work with the community and colleges and university to provide cost-effective practices, including researching and pursuing language assistance products and translation services developed and paid by local, regional and state government agencies.

Conduct Equity Analysis to Determine Site or Location of Facilities – The Jule has not conducted any projects requiring land acquisition and/or the displacement of persons from their residence and businesses.

## **LEP Implementation Plan**

The following measures have or will be implemented to ensure LEP persons have adequate access to transit information:

- As necessary, the Jule dispatch staff will access the LanguageLine Solutions language assistance service. This service is available 24-hours a day and is a three-way call translation service that can translate over 240 languages. The service provides a sheet that lists the languages available, allowing the LEP individual to show the staff their language and be connected to the appropriate interpreter.
- The Jule will continue to seek out and identify employees who speak a language other than English. For those employees who are able and willing to provide translation service, their services will be called upon as needed during regular hours of operations to interpret and assist LEP individuals
- The Jule has added all route information to Google Maps which is available in multiple languages.

### Train Staff

Current and incoming employees will be trained on the policies and procedures of the language assistance program. Staff would also be retrained/reminded annually. Bi-monthly staff meetings are held for all drivers and dispatch staff (as appropriate) and the LEP tools are presented during one of the fall meetings. Staff would have the necessary information provided to them to assist LEP individuals. The following information will be available to assure staff can adequately assist LEP individuals:

- Information on Title VI Policy and LEP responsibilities
- Description of language assistance services offered to the public
- Contact information of chosen bilingual staff who have agreed to assist in translation services
- Documentation of language assistance requests
- Use of the Telephone Translation Service
- How to handle a potential Title VI/LEP Complaint

### Notice to LEP Persons

The Jule will provide general public information, bus timetables, route information, and any additional pertinent information to community groups and agencies, business partners and the colleges and university for distribution to LEP individuals.

The City of Dubuque website has a translate feature for all major languages. All Jule route and schedule information is provided there. As Jule route brochures are updated information about the language assistance, including the website translation will be included and stated as free of charge. These route brochures will be provided through community partners for distribution to LEP individuals.

### Monitoring and Updating the LEP Plan

All language assistance programs and procedures will be evaluated on an annual basis. The plan will also be reviewed and updated as new information becomes available.

The following will be monitored and reviewed annually:

- The number of documented LEP persons encountered
- How the needs of the LEP persons were addressed
- Determine whether language assistance programs have been used and/or are effective
- Evaluate the number of outreach efforts provided to community partners

- Determine if any changes in the level of assistance provided is required

Dissemination of the Title VI/LEP Plan

A link to the LEP Plan and the Title VI Plan will be included on The Jule's website:

[www.cityofdubuque.org/thejule](http://www.cityofdubuque.org/thejule)

Any person or agency with Internet access will be able to access and download the plan from the website. Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail or in-person, and shall be provided a copy of the plan at no cost. LEP individuals may request copies of the plan translated, if feasible.