



East Tennessee Human Resource Agency
Public Transit Program

Title VI Program
Federal Transit Administration
(FTA)

October 1, 2025

ELEMENTS

- ❖ Title VI Notice to the Public, including a list of locations where the notice is posted (***pages 3 & 4***)
- ❖ Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint) (***pages 5 through 8***)
- ❖ Title VI Complaint Form (***pages 9 & 10***)
- ❖ List of transit-related Title VI investigations, complaints, and lawsuits (**N/A-None**)
- ❖ Public Participation Plan, including information about outreach methods to engage minority and limited English proficient populations (LEP) and a summary of outreach efforts made since the last Title VI Program submission. (***pages 11 through 26***)
- ❖ Language Assistance Plan for providing language assistance to persons with limited English proficiency (LEP), based on the DOT LEP Guidance (***pages 27 through 44***)
- ❖ Table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient, broken down by race, and a description of the process the agency uses to encourage the participation of minorities on such committees (**N/A**)
- ❖ Primary recipients shall include a description of how the agency monitors its sub-recipients for compliance with Title VI, and a schedule of sub-recipient Title VI Program submissions (**N/A**)
- ❖ A Title VI equity analysis if the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc. (**N/A**)
- ❖ Requirements of Fixed-Route Transit Providers: Service Standards and Policies (***pages 45 & 46***)
(Note: <50 fixed-route vehicles in peak service)

Public Notification of Title VI Rights

East Tennessee Human Resource Agency

Public Transit Program

- The East Tennessee Human Resource Agency operates without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act of 1964. Any person who believes he or she has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with ETHRA.
- For more information on ETHRA's civil rights program and the procedures to file a complaint, call 865-691-2551 (TTY 865-681-1990), e-mail sbandy@ethra.org, or visit our office at 9111 Cross Park Drive, Suite D-100, Knoxville, TN, 37923. For more information, visit www.ethra.org.
- A complaint may be filed directly with the Federal Transit Administration by writing:

The Office of Civil Rights,
Attention: Title VI Program Coordinator
East Building, 5th Floor-TCR, 1200 New Jersey Avenue, SE
Washington, DC, 20590,

OR

Cynthia Howard, Title VI Program Director
Tennessee Department of Transportation, Civil Rights Office
James K. Polk Building
505 Deaderick St., Suite 1800
Nashville, TN 37243-0347
615.741.3681, Toll-Free: 1.888.370.3647

- If information is needed in another language, contact 865-691-2551.

* Si se necesita información en otro idioma, llame 865-691-2551.

Note: Posted in every ETHRA office, the agency website, and all Transportation vehicles.

Notificación Pública de los Derechos del Título VI
Agencia de Recursos Humanos del Este de Tennessee
Programa de Transporte Público

- El Organismo de Recursos Humanos del Este de Tennessee opera sin tener en cuenta la raza, el color y el origen nacional de acuerdo con el Título VI de la Ley de Derechos Civiles de 1964. Cualquier persona que crea que ha sido agraviada por cualquier práctica discriminatoria ilegal bajo el Título VI puede Presentar una queja ante ETHRA.
- Para obtener más información sobre el programa de derechos civiles Ethra 's y los procedimientos para presentar una queja, llame al 865-691-2551 (TTY 865-681-1990); e-mail sbandy@ethra.org ; o visite nuestra oficina al 9111 Cross Park Drive, Suite D-100, Knoxville, TN, 37923. Para obtener más información, visite www.ethra.org .
- Una queja puede ser archivos directamente con la Administración Federal de Tránsito por escrito a la

Oficina de Derechos Civiles,
Atención: Coordinador del Programa Título VI, Edificio Este, 5º Piso-TCR,
1200 New Jersey Avenue, SE, Washington, DC, 20590,

O

Cynthia Howard, Directora del Programa Título VI
Departamento de Transporte de Tennessee, Oficina de Derechos Civiles,
Edificio James K. Polk, 505 Deaderick St., Suite 1800
Nashville, TN 37243-0347
615.741.3681, Línea gratuita: 1.888.370.3647

- Si se necesita información en otro idioma, comuníquese al 865-691-2551.

(Nota: Publicado en todas las oficinas de ETHRA)

9111 Cross Park DRIVE, STE D-100 • Knoxville, TN 37923 info@ethra.org (865) 691-2551 TTY (800) 848 a 0298 ethra.org

**East Tennessee Human Resource Agency
Public Transit Program**

Title VI Complaint Procedures

XI. Complaint Procedures

The Title VI Coordinator will promptly investigate all complaints of alleged discrimination. If the investigation indicates that the discrimination may affect persons other than the complainant, such corrective action shall include such other persons. Upon completion of each investigation, the Title VI Coordinator will inform every complainant of his/her avenues of appeal.

1. Acceptance of the Complaint -Upon receiving a Title VI/ EO complaint or any other complaint alleging discriminatory conduct, impact, or effect, the Title VI Coordinator will conduct an initial evaluation of the merits of the complaint and determine whether it states a valid claim. If so, the Title VI Coordinator will add the complaint to the complaint log and proceed with appropriate investigatory action. If the subject matter or issue does not fall within the jurisdiction of this policy, the Title VI Coordinator will advise the complainant of other available procedures.

2. Notice – If a complaint is determined to be valid, a copy will immediately be forwarded to the Tennessee Attorney General’s Civil Rights Enforcement Division for jurisdictional determination. The complainant, ETHRA’s Executive Director, and the funding source for the program involved will also be notified within three business days that a valid complaint has been filed and an investigation has been opened. If the complainant is a TennCare enrollee, TennCare’s Office of Civil Rights Compliance (“OCRC”) will also be promptly notified of the same. The complainant, the funding source, the Attorney General’s Civil Rights Enforcement Division, and OCRC (if applicable) will receive regular updates regarding the case, as well as a copy of any final decision.

3. Investigation – A formal investigation will be initiated if a complaint is timely, within the scope of this policy, and articulates sufficient facts, which, if determined to be accurate, would support a finding that the Agency’s discrimination policies have been violated.

The general policy of ETHRA is that the Title VI Coordinator investigates all administrative complaints that appear to have merit and are complete or adequately pleaded. Examples of complaints with no apparent merit might include those that are so insubstantial or incoherent that they cannot be considered to be grounded in fact.

4. Complaint Contents - A complete or properly pleaded complaint is:

1. In writing, signed, and provides an avenue for contacting the signatory, e.g., phone number, address, email, etc.; (note: reasonable accommodations are available upon request to all potential complainants who may require special assistance to meet this requirement);
2. Describes, to the extent known and available, the alleged discriminatory act(s) that violate Title VI/ EO regulations (i.e., an act of intentional discrimination or one that has the effect of discriminating on the basis of race, color, national origin, sex, age, disability or other protected categories). This would include: the name of the person(s) directly responsible for the alleged discrimination; the date(s), time(s), and place(s) of the alleged violations; the nature of the alleged violation(s), i.e., race, sex, disability, etc.); a detailed description of the conduct that is the basis of the allegation; copies of any documents or other tangible items pertaining to the alleged violation(s); name(s) and contact information for any witnesses to the alleged violation(s), and any other relevant information.
3. Filed within 180 calendar days of the alleged discriminatory act(s); and

The Title VI Coordinator will decide to accept, reject, or refer (to the appropriate federal or state agency) a complaint within seven (7) calendar days of acknowledgment of its receipt.

5. Processing complaints -

- A.) The Title VI Coordinator will maintain a log of all complaints and appeals. The complaint will be logged by case number, based on the year, month, and sequence in which it was received.

- B.) A copy of the complaint will also be forwarded to the official responsible for the alleged discriminatory service or program.
- C.) The investigating officer will initiate the investigation by first contacting the complainant by telephone within three (3) working days of receiving the assignment to set up an interview.
- D.) The complainant will be informed that they have a right to have a witness or representative present during the interview and can submit any documentation he/she perceives as relevant to proving his/her complaint.
- E.) The alleged discriminatory service or program official will be allowed to respond to all aspects of the complainant's allegations.
- F.) The investigating officer will determine, based on relevancy or duplication of evidence, which witnesses will be contacted and questioned.
- G.) The investigating officer will contact the complainant at the conclusion of the investigation, but before writing the final report, and allow the complainant to give a rebuttal statement at the end of the investigation process.
- H.) The investigation will be completed, and a final report will be sent to the Attorney General's Civil Rights Enforcement Division, OCRC (if applicable, i.e., if the complainant is a TennCare recipient), the program's funding source, the alleged discriminatory service or program manager, and the complainant within sixty (60) calendar days of the date Title VI Coordinator received the complaint. If an investigation cannot be completed within sixty (60) days, the coordinator will notify the complainant of that fact and provide a timeframe for completing the investigation. The Coordinator's final report will include the following:
- 1) The written complaint containing the allegation, basis, and date of filing;
 - 2) Summarized statements taken from witnesses;
 - 3) Finding of facts;
 - 4) Opinion (based on all evidence in the record) that the incident is substantiated or unsubstantiated;
 - 5) Remedial action(s) for substantiated cases;

I.) If corrective action(s) are recommended, the responsible agency supervisor or manager will be given thirty (30) calendar days to inform the Title VI Coordinator of the actions taken for compliance.

J.) Corrective actions can be in the form of actions to be taken at a future date after the initial thirty (30) days, with projected time period(s) in which the action will be completed.

K.) If the recommended corrective action(s) have not been taken within the thirty (30) day timeframe allowed, the program will be deemed to be in noncompliance with Title VI and implementing regulations, and a referral will be made to the Attorney General's Civil Rights Enforcement Division and the program's funding source for enforcement action.

6. Appeals Procedures-

- A) The complainant has the right to appeal all written reports to the Attorney General's Civil Rights Enforcement Division, and/or the program's funding source. TennCare recipients may also have further appeal rights within OCRC procedures.
- B) An appeal must be made in writing to the Title VI Director within fourteen (14) days of the complainant's receipt of the Agency's final report.
- C) The appeal must specifically cite the portion(s) of the finding with which the complainant disagrees and his/her reason(s) for disagreement.
- D) The Title VI Coordinator will forward this appeal within seven (7) calendar days to the Executive Director, the Attorney General's Civil Rights Enforcement Division, OCRC (if applicable), and the program's funding source for review.

EAST TENNESSEE HUMAN RESOURCE AGENCY, INC.
Title VI

Note: The following information is requested to help in processing your complaint. If you need help in completing this form please request assistance.

Complainant Name: _____

Address: _____

Person discriminated against (if someone other than the complainant).

Name: _____

Address: _____

Telephone: (Home) _____ (Work) _____

Which department of this agency do you believe discriminated against you?

Name of department: _____

Which of the following best describes the reason you believe the discrimination took place?

Race: ☐ Color: ☐ National Origin: ☐ Other: ☐

In the space below please describe the alleged discrimination. Explain what happened, who you believe was responsible and the date of the alleged discrimination.

Please sign below. You may attach any additional information you think is relevant to your complaint.

Signature of Complainant

Date

Submit completed form to SBandy@ethra.org, or fax to attention of S. Bandy at (865)531-7216, or mail to S. Bandy at 9111 Cross Park Drive, Suite D-100, Knoxville, TN 37923

(Note: This form is available in a fillable format, at our website, or upon request. It is also available in Spanish.) 2025

ESTE TENNESSE HUMANO RECURSO AGENCIA, C^a.

Título VI

Nota: El siguiente información es solicitado a ayuda en tratamiento su queja. Si tú necesidad ayuda en Completando este formulario por favor solicite ayuda.

Querellante Nombre: _____

Persona discriminado contra (si alguien otro que el querellante).

Nombre:

DIRECCIÓN: _____

Teléfono: (Casa) _____ (Trabajo) _____

Cual departamento de este agencia hacer tú creer discriminado contra ¿tú?

Nombre de departamento: _____

Cual del siguiendo lo mejor describe el razón por la que crees el discriminación ¿ Tuvo lugar?

Raza: ☐ Color: ☐ Origen nacional: ☐ Otro: ☐

En el espacio abajo por favor describir el presunto discriminación. Explicar qué sucedió, OMS tú cree que fue responsable y la fecha de la supuesta discriminación.

Por favor firmar abajo. Tú puede adjuntar cualquier adicional información tú pensar es importante a su queja.

Firma del denunciante

Fecha

Entregar terminado forma a SBady@ethra.org, o fax a atención de S. Hockey con pelota en (865)531-7216, o correo a S. Bandy en 9111 Cross Park Drive, Suite D-100, Knoxville, TN 37923

East Tennessee Human Resource Agency

Public Transit Program

Public Participation Plan (PPP)

The East Tennessee Human Resource Agency (ETHRA) Public Transit Program encourages active participation by the public and other interested parties in the development of all transportation plans and programs, particularly the significant products. ETHRA believes that the distribution of information regarding transportation planning and decision-making needs to include as many in the public as can reasonably be reached and that interested parties and other federal, state, and local agencies should be given a fair opportunity to participate in the planning process.

ETHRA's policy is to consider all public and stakeholder comments in developing and adopting plans and programs. The processes outlined in this document form the basis for providing the opportunity for the general public and key stakeholders to participate in the transportation planning process. This Public Participation Plan (PPP) has been developed to meet federal requirements outlined by Title VI of the Civil Rights Act of 1964, the Americans with Disabilities Act (ADA) of 1990, and other applicable regulations.

Title VI

ETHRA assures that no person shall, on the grounds of race, color, national origin, income, gender, age, or disability as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 (PL 100.259), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity.

More specifically, ETHRA assures that every effort will be made to prevent discrimination through the impacts of its programs, policies, and activities on minority and low-income populations. Additionally, ETHRA will take reasonable steps to provide meaningful access to services for persons with Limited English Proficiency.

ETHRA further assures that every effort will be made to ensure nondiscrimination in all its programs and activities, whether federally funded or not.

ETHRA's Title VI Coordinator is responsible for initiating and monitoring Title VI activities, preparing required reports, and other related responsibilities as required by state and federal Title VI and Equal Opportunity regulations.

ETHRA is committed to engaging low-income and minority populations in the transportation decision-making process and building relationships with all stakeholders, including those who serve underrepresented populations. Active participation of all affected communities will help ensure that transportation plans and projects avoid, minimize, or mitigate these impacts on low-income and minority populations. For this reason, ETHRA is committed to developing and using public engagement to encourage these populations to participate during the planning and implementation of ETHRA programs, policies, and activities. Furthermore, coordination with community leaders is expected to expand the public engagement process and ensure the dissemination of information to their constituents.

To these ends, notices of meetings and public hearings will be specifically targeted to minority and/or other groups considered to be traditionally underserved to encourage participation in the transportation planning process. Minority and ethnic communities will be monitored through census data to ensure their inclusion in the process as populations fluctuate over time. In addition, special accommodations (e.g., interpreter, sign language interpreter, large print copy, etc.) to help disabled individuals may be requested of ETHRA during regular business hours at least five (5) business days before the meeting, and ETHRA will attempt to accommodate all such requests.

Introduction

This document presents the goals for public participation and involvement and the public involvement procedures designed for various transportation planning activities. The purpose is to provide opportunities for all citizens to contribute ideas and opinions early and at every stage of the planning process.

Efforts will be made in the transportation planning and programming process to:

- Assure participation by traditionally underserved individuals, including the elderly, low-income and minority individuals, persons with disabilities, and persons with Limited English Proficiency (LEP).
- Ascertain what non-English languages and barriers exist to provide participation in the service area.
- Provide public meeting notifications in a manner comprehensible to all populations in the service area.
- Provide transportation to public meetings free of charge upon request.
- Consider any and all concerns received from all populations in an equal manner.

Identification of Stakeholders

Stakeholders are individuals either directly or indirectly affected by the plan and/or those who make recommendations for the plan. Those who may be affected or unaware of the benefits of the plan's recommendation(s) are of particular interest in identifying specific stakeholders. Stakeholders are broken down into several groups: general citizens, minority and low-income persons, public agencies, and private organizations and businesses.

Techniques such as those listed in the "Outreach Efforts to Enhance Public Participation and Involvement" section are used to engage all populations in traditional and nontraditional involvement methods. These techniques are followed to gain input, either directly or indirectly; to engage the minority or LEP persons in the process, and to otherwise develop new insights and perspectives from others outside the typical transit environment.

Because of the importance of an all-inclusive outreach program that ensures compliance with Title VI and the Americans with Disabilities Act of 1990, ETHRA will emphasize efforts to reach out to traditionally underserved or underrepresented segments of the region's population, including:

- Low income,
- Minorities,

- Homeless or institutionally housed,
- Limited English Proficiency (LEP),
- Limited Literacy,
- Transit Dependent,
- Transportation Disadvantaged,
- Single-parent Families,
- The Elderly

Major Service Change

The Federal Transit Administration (FTA) requires that recipients prepare and submit service and fare equity analyses for public comment when considering proposed major service or fare changes. This policy aims to establish thresholds for defining a “Major Service Change” and the definition of an adverse impact created by a “Major Service Change.”

East Tennessee Human Resource Agency (ETHRA) defines a “Major Service Change” as any change that affects 25% or more of the number of transit route miles of a route (addition or deletion) or 25% or more of the number of transit revenue vehicle miles of a route, computed on a daily basis for the day of the week for which the change is to be made (either addition or deletion). When a change is determined to be a “Major Service Change”, ETHRA staff will conduct a service equity analysis, according to FTA Circulars 4702.1B and 4703.1, and present the results of that analysis to the ETHRA Board of Directors and/or any other local governing agency that may be impacted when considering approval of the said change. A temporary addition or deletion of service (e.g., demonstration projects) or detours is exempt from ETHRA’s definition of Major Service Change. Should the temporary change of service last longer than twelve (12) months, the service change will be considered a Major Service Change, and a service equity analysis will be conducted by ETHRA staff and considered by the ETHRA Board of Directors and any other local governing agency that may be impacted.

Public Comment Process:

Although ideas and opinions from all citizens are encouraged during the many stages of the planning process, public comment is especially important when considering a major service or fare change (see definition above). When such a proposal is under consideration, every effort will be made to give as much notice as possible before the meeting held to discuss these changes. Under no circumstances will the notice be less than thirty days, and the public participation techniques outlined in this plan will be followed to reach as many affected groups as possible.

Any comments from the public related to a proposed major service or fare change will be given the utmost consideration. Negative changes to fares or transportation services will be approved only when absolutely necessary and no other alternatives are feasible. Measures will be taken whenever possible to minimize the effects of any such changes.

Background, General Information, and Statistics

General Citizens: There are over 827,000 residents in the ETHRA service area, with an additional 506,000 in the area's most populous county, Knox. Approximately 94% of the population in ETHRA's counties consider themselves to be of the white race, while 86% of the Knox County residents consider themselves white. [Source: U.S. Census Bureau QuickFacts, effective 7/1/2024 **]

Minorities: Minority populations comprise a relatively small percentage of the ETHRA service area. African Americans are a significant minority, with slightly more than 2% of the total population, but Hispanics now comprise approximately 5% of the population in many counties served. Asian persons comprise less than 0.9% of the population, and multi-ethnic individuals comprise approximately 1.8%. [Source: U.S. Census Bureau QuickFacts, effective 7/1/2024 **]

LEP Populations: The most recent U.S. Census Bureau data shows that only a tiny percentage of the population served by ETHRA's Public Transit Program speaks little or no English. Most of these individuals are concentrated in Hamblen

County, with those considered Limited English Proficient at 8.5 percent of the population. Many other counties in the service area have statistically negligible LEP populations (Scott at 0.5%, Roane at 0.9%, and Cocke at 0.4%). [Source: American Community Survey, 2023: ACS 5-Year Estimates Data Profiles, effective April 2025]

Low-income: While the overall percentage of persons below the federal poverty level in Tennessee is approximately 14%, the poverty rates in ETHRA's counties of service range from below the state average (9.7% in Blount and 10.5% in Loudon) to significantly above the state's level (21% in Scott and 26.7% in Hancock). [Source: U.S. Census Bureau QuickFacts, effective 7/1/2024 **]

[** Source: <https://www.census.gov/quickfacts/fact/table/US/PST045222>
(Reviewed 7/1/2025)]

Public Agencies, Private Organizations, and Businesses: Public agencies, private organizations, and businesses offer valuable perspectives to the planning process.

Public Participation Techniques

This section describes the various techniques for conducting public participation. Opportunities for public input are not limited to those in this section, and other techniques may be employed to increase awareness of relevant ETHRA policies while encouraging public participation in the development process.

Media

Press Releases and Public Service Announcements

To broaden the public's participation in transportation planning decisions, ETHRA will use media press releases and public service announcements to announce opportunities for the public to participate in planning-related issues.

Registered news media and organizations, such as significant neighborhood groups and/or minority groups, on ETHRA's email list will receive all press releases. Public Service Announcements will be distributed to the appropriate media. A special effort will be made to reach traditionally underrepresented groups via local media establishments.

Newspapers

Notices of all meetings, public hearings, and public comment periods are published in the Knoxville News Sentinel and other local media outlets when available and appropriate. They are published at least seven (7) days before the scheduled meeting.

Radio, TV, and Other Media Forums

Various TV and radio stations throughout the area offer opportunities for organizations to inform their viewers about upcoming meetings and events. Press releases of meetings are sent to all local radio and TV outlets.

Presentations/Meetings/Workshops

Formal Meetings

Formal meetings will be held in ADA-accessible facilities in locations served either by fixed-route transit service or an on-demand service. ETHRA will select the location, size, and setup of meeting facilities based on the specific characteristics of the audience and the type of information to be presented.

Public meetings and workshops will be held in areas that offer the greatest opportunity for those interested to participate. As much as possible, ETHRA will hold meetings and workshops in public places (e.g., public libraries, hotel conference centers, town centers, or shopping malls) that attract the mix of people and businesses most representative of the community.

To encourage the involvement of minority and LEP populations, any required meetings or hearings will be held at locations and times that are accessible and convenient for minority and LEP communities.

ETHRA will seek to increase participation for all public meetings by creating a welcoming and inviting environment. Furthermore, all meeting agendas contain the following statement:

ADA Notice: For special accommodations for this meeting, contact the Title VI/ADA Coordinator at least one week in advance at (865) 691-2551, extension 4262 (TTY 711).

Other Tools

ETHRA Website

Many people use the Internet as their main source of data and information. The physically disabled can use this source to receive input and provide feedback without physically attending meetings.

The ETHRA website (www.ethra.org) provides a comprehensive resource to people wanting information about services or activities, public notices of all meetings, and public hearings.

Comment Cards

To assess priorities and goals, comment cards will be available at all public meetings, including project-specific open houses and town meetings.

Enhanced Outreach Methods

ETHRA will work with community and faith-based organizations to effectively reach minority and LEP groups. These organizations will be notified of meetings, hearings, and general program updates and encouraged to share this information with interested parties.

ETHRA will use enhanced public outreach and communications methods for hard-to-reach or traditionally underserved populations when appropriate for project-specific meetings. When reaching out to those communities, ETHRA will use simple, straightforward language, incorporating visual aids such as photos, renderings, aerials, and color charts to help communicate complex concepts and plans. Meetings and workshops will be held at ADA-accessible locations, which are convenient and most effective in encouraging turnout and input. In general, facilities will be located close to participants' homes, work, or other places they frequent. Potential meeting sites include community churches, local ministries to the poor and/or homeless, public schools, libraries, transit facilities, universities, and shopping facilities.

The following are additional methods ETHRA may use to reach out to special populations:

- ETHRA may use visualization methods (maps, displays, charts, and other static and interactive engagements) to make the topic relevant to the target audience. The extensive use of maps, aerial photographs, and simple charts allows for greater participation and understanding by those who may be more visually oriented and will allow for greater participant interaction.
- If meetings are to be held in areas predominantly populated by non-English-speaking populations, ETHRA will have people available to help translate questions and input.
- When appropriate, ETHRA will use community-based TV and radio stations and websites to target messages and solicit input from specific population segments, including minority and LEP groups.

Title VI Resources

Community Associations, Advocacy Groups, and Media Outlets

American Association of Retired Persons	tnaarp@aarp.org
Hispanic Chamber of Commerce of East Tennessee	carloso@latinchambertn.com
HOLA Lakeway	info@holalakeway.org
Knoxville Area Urban League	info@thekaul.org
Knoxville Chamber of Commerce	marcom@knoxvillechamber.com
Knoxville Community Action Agency	misty.goodwin@knoxcac.org
Legal Aid of East Tennessee	twoods@laet.org
Legal Aid Society	jmynatt@las.org
National Association for the Advancement of Colored People	we@knoxnaacp.org
WKZX, 93.5 FM (Lenoir City, Tennessee)	wkzx@aol.com
Centro Hispano de East Tennessee	maria@centrohispanotn.org

Information and statistics updated July 2025

Title VI Outreach Summary

From: [Steve Bandy](#)

To: tnaarp@aarp.org; carlos@latinchambertn.com; info@holalakeway.org; info@thekaul.org; marcom@knoxvillechamber.com; misty.goodwin@knoxcac.org; twoods@laet.org; jmynatt@las.org; we@knoxnaacp.org; wkzx@aol.com; maria@centrohispanotn.org

Cc: [Mike Patterson](#); [Brent Gagley](#)

Subject: ETHRA Transit

Date: Monday, July 21, 2025 7:08:00 AM

Attachments: [image001.png](#)
[image002.png](#)

Good morning:

Affordable, dependable, and accessible transportation services are vital to East Tennessee residents and provide a foundation for a strong local economy. As we have for several decades, the Public Transit Program at East Tennessee Human Resource Agency (ETHRA) offers reliable transportation for thousands of residents in our area.

Many of these trips are critically important. For example, 58% of the trips over the past year were for medical purposes, including life-saving therapies such as dialysis and chemotherapy. Trips related to employment, education, and training made up 29% of the total, and trips to senior centers, churches, retail stores, pharmacies, etc., accounted for the balance. Overall, trips provided through ETHRA Transit totaled over 2.89 million miles during the past year.

In addition to our demand-response trips in the region, ETHRA operates a fixed-route service that provides scheduled trips to the metro Morristown area. Lakeway Transit offers three fixed bus routes on a pulse system in the Morristown area, taking riders to work, doctors, shopping, etc., throughout the Morristown metro region, including regular trips to Knoxville. There are now 103 fixed route stops, with new stops being considered to better serve the people in this area.

ETHRA is committed to including low-income and minority populations in the Transportation decision-making process to ensure fair and adequate service. Furthermore, we want to build relationships with our stakeholders, including those serving underrepresented populations. Finally, we want to work with community leaders to expand the public engagement process and ensure access to information for the families we serve.

ETHRA is an equal-opportunity employer and service provider. To ensure full participation, auxiliary aids, accommodations, and modifications are available upon request.

We welcome your comments, suggestions, and ideas about our program, including ways to improve our service or better meet the needs of our clients. Please contact Mike Patterson (Transportation Director, 865-691-2551, extension 4263) or Brent Gagley (Assistant Transportation Director, 865-691-2551, extension 4299) if you have any questions or want additional information.

Steve Bandy

Operations Director, Housing and Energy Services Title VI
& Equal Opportunity Office

Equal Employment Opportunity Officer



East Tennessee Human Resource Agency (TN113) 9111
Cross Park Drive, Suite D-100
Knoxville, TN 37923
(865) 691-2551, extension 4262
TTY (800) 848-0298
Fax (865) 531-7216

ETHRA is an Equal Opportunity Employer/Program. Auxiliary aids and services are available to individuals with disabilities upon request.

From: [Steve Bandy](#)
To: [AARP](#); [Centro Hispano de East Tennessee](#); ["Hispanic Chamber of Commerce of East TN"](#); [Knoxville Area Urban League](#); [Knoxville Chamber of Commerce](#); [Legal Aid of East Tennessee](#); [Legal Aid Society](#); [NAACP](#); ["jim.brown@nfib.org"](#); ["psanchez@norsangroup.com"](#)
Cc: [Mike Patterson](#); [Brent Gagley](#)
Subject: ETHRA Transit Program
Date: Wednesday, July 24, 2024 10:08:00 AM
Attachments: [image001.png](#)
[image002.png](#)

Good morning:

Affordable, dependable, and accessible transportation services are vital to East Tennessee residents and provide a foundation for a strong local economy. As we have for several decades, the Public Transit Program at East Tennessee Human Resource Agency (ETHRA) offers reliable transportation for thousands of residents in our area.

Many of these trips are critically important. For example, almost 56% of the trips over the past year were for medical purposes, including life-saving therapies such as dialysis and chemotherapy. Trips related to employment, education, and training made up 29% of the total, and trips to senior centers, churches, retail stores, pharmacies, etc., accounted for the balance. Overall, trips provided through ETHRA Transit totaled over three million miles during the past year.

In addition to our demand-response trips in the region, ETHRA operates a fixed-route service that provides scheduled trips to the metro Morristown area. Lakeway Transit offers three fixed bus routes on a pulse system in the Morristown area, taking riders to work, doctors, shopping,

etc., throughout the Morristown metro region, including regular trips to Knoxville. There are now 103 fixed route stops, with new stops being considered to better serve the people in this area.

ETHRA is committed to including low-income and minority populations in the Transportation decision-making process to ensure fair and adequate service. Furthermore, we want to build relationships with our stakeholders, including those serving underrepresented populations. Finally, we want to work with community leaders to expand the public engagement process and ensure access to information for the families we serve.

ETHRA is an equal-opportunity employer and service provider. To ensure full participation, auxiliary aids, accommodations, and modifications are available upon request.

We welcome your comments, suggestions, and ideas about our program, including ways to improve our service or better meet the needs of our clients. Please contact Mike Patterson (Transportation Director, extension 4263) or Brent Gagley (Assistant Transportation Director, extension 4299) if you have any questions or want additional information.

Steve Bandy

Operations Director, Housing and Energy Services Title VI
& Equal Opportunity Officer

Equal Employment Opportunity Officer



East Tennessee Human Resource Agency (TN113) 9111
Cross Park Drive, Suite D-100

Knoxville, TN 37923

(865) 691-2551, extension 4262

TTY (800) 848-0298

Fax (865) 531-7216

ETHRA is an Equal Opportunity Employer/Program. Auxiliary aids and services are available to individuals with disabilities upon request.

From: [Steve Bandy](#)

To: [AARP](#); [Centro Hispano de East Tennessee](#); ["Hispanic Chamber of Commerce of East TN"](#); [Knoxville Area Urban League](#); [Knoxville Chamber of Commerce](#); [Legal Aid of East Tennessee](#); [Legal Aid Society](#); [NAACP](#); ["jim.brown@nfib.org"](#); ["psanchez@norsangroup.com"](#); ["laliderwkzx@gmail.com"](#)

Cc: [Mike Patterson](#); [Brent Gagley](#)

Subject: ETHRA Transportation

Date: Monday, August 7, 2023 7:35:00 AM

Attachments: [image001.png](#)
[image002.png](#)

Good morning:

Affordable, dependable, and accessible transportation services are vital to the residents of East Tennessee and are crucial for a strong economy. As we have for several decades, the Public Transit Program at East Tennessee Human Resource Agency (ETHRA) provides transportation for thousands and thousands of our residents.

Many of these trips are critically important. For example, almost 59% of the trips over the past year were for medical purposes, including life-sustaining therapies such as dialysis. Trips related to employment, education, and training made up 25% of the total, and trips to senior centers, churches, retail stores, pharmacies, etc., accounted for the balance. Overall, trips provided through ETHRA Transit totaled over three million miles during the past year.

In addition to our demand-response trips in the region, ETHRA operates a fixed-route service providing scheduled trips in the metro Morristown area. Lakeway Transit offers three fixed bus routes on a pulse system in the Morristown area, taking riders to work, doctors, shopping, etc., throughout the Morristown metro region, including regular trips to Knoxville. There are now 102 fixed route stops, with new stops being added regularly for the convenience of the people in this area.

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We welcome your comments, suggestions, and ideas about our program, including ways to improve our service or better meet the needs of our clients. Please reach out to Mike Patterson (Transportation Director, extension 4263) or Brent Gagley (Assistant Transportation Director, extension 4299) if you have any questions or would like additional information.

Steve Bandy

Operations Director, Housing and Energy Services (PHA TN113)

Title VI, Equal Opportunity, & Equal Employment Opportunity Officer



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Steve Bandy

From: Steve Bandy
Sent: Thursday, July 14, 2022 7:41 AM
To: AARP; Centro Hispano de East Tennessee; Hispanic Chamber of Commerce of East TN; Knoxville Area Urban League; Knoxville Chamber of Commerce; Legal Aid of East Tennessee; Legal Aid Society; NAACP; jim.brown@nfib.org; psanchez@norsangroup.com; laliderwkzx@gmail.com
Cc: Mike Patterson; Brent Gagley
Subject: ETHRA'S Public Transit Program

Good morning:

Affordable, dependable, and accessible transportation services are vital to our region, the area economy, and the residents of East Tennessee . As we have for several decades, the Public Transit Program at East Tennessee Human Resource Agency (ETHRA) provides transportation for thousands and thousands. Many of these trips are critically important. For example, over 55% of the trips over the past year were for medical purposes, including life-sustaining therapies such as dialysis. Trips related to employment, education, and training made up over

28% of the total, with shopping, recreation, and church-related trips accounting for the balance. Overall, trips through ETHRA Transit totaled over 2.8 million miles during the past year.

In addition to our demand-response trips in the region, ETHRA operates a fixed-route service providing scheduled trips in the metro Morristown area. Lakeway Transit offers three fixed bus routes on a pulse system throughout Morristown, taking riders to work, doctors, shopping, etc., throughout the Morristown region, including regular trips to Knoxville.

ETHRA is committed to including low-income and minority populations in the transportation decision-making process. We also want to build relationships with all stakeholders, including those who serve underrepresented populations. Finally, we want to work with community leaders to expand the public engagement process and ensure the availability of information for the families we serve.

We welcome your comments, suggestions, and ideas about our program, including ways we can improve our service or better meet the needs of our clients. Please contact Mike Patterson (Transportation Director, extension 4263) or Brent Gagley (Assistant Transportation Director, extension 4299) if you have any questions or would like additional information.

Steve Bandy

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ETHRA LEP Policy/Language Assistance Plan

Title VI in the Limited English Proficiency (LEP) Context

A recipient/covered entity whose policies, practices, or procedures exclude, limit, or have the effect of excluding or limiting the participation of any LEP person in a federally-assisted program on the basis of national origin may be engaged in discrimination in violation of Title VI. To ensure compliance with Title VI, recipient/covered entities must ensure that LEP persons eligible for their programs or services have meaningful access to the health and social service benefits they provide. The most important step in meeting this obligation is for recipients of Federal financial assistance, such as grants, contracts, and subcontracts, to provide the language assistance necessary to ensure such access, at no cost to the LEP person.

The type of language assistance a recipient/covered entity provides to ensure meaningful access will depend on a variety of factors, including the size of the recipient/covered entity, the size of the eligible LEP population it serves, the nature of the program or service, the objectives of the program, the total resources available to the recipient/covered entity, the frequency with which particular languages are encountered, and the frequency with which LEP persons come into contact with the program.

The steps taken by a covered entity must ensure that the LEP person is given adequate information, understands the services and benefits available, and receives those for which he or she is eligible. The covered entity must also ensure that the LEP person can effectively communicate the relevant circumstances of his or her situation to the service provider.

- **Oral Language Interpretation**-- In designing an effective language assistance program, a recipient/covered entity develops procedures for obtaining and providing trained and competent interpreters and other oral language assistance services in a timely manner by taking some or all of the following steps:

- Hiring bilingual staff who are trained and competent in the skill of interpreting;
- Hiring staff interpreters who are trained and competent in the skill of interpreting;
- Contracting with an outside interpreter service for trained and competent interpreters;
- Arranging formally for the services of voluntary community interpreters who are trained and competent in the skill of interpreting;
- Arranging/contracting for the use of a telephone language interpreter service.

▪ **Interpreters**

- **Use of Friends, Family, and Minor Children as Interpreters** -- A recipient/covered entity may expose itself to liability under Title VI if it requires, suggests, or encourages an LEP person to use friends, minor children, or family members as interpreters, as this could compromise the effectiveness of the service. Using such persons could result in a breach of confidentiality or reluctance on the part of individuals to reveal personal information critical to their situations. This reluctance could have serious, even life-threatening, consequences in a medical setting. In addition, family and friends usually are not competent to act as interpreters since they are often insufficiently proficient in both languages, unskilled in interpretation, and unfamiliar with specialized terminology.

If after a recipient/covered entity informs an LEP person of the right to free interpreter services, the person declines such services and requests the use of a family member or friend, the recipient/covered entity may use the family member or friend, if the use of such a person would not compromise the effectiveness of services or violate the LEP person's confidentiality. The recipient/covered entity should document the offer and declination in the LEP person's file. Even if an LEP person elects to use a family member or friend, the recipient/covered entity should suggest that a trained interpreter sit in on the encounter to ensure accurate interpretation.

- **Competence of Interpreters** -- To provide effective services to LEP persons, a recipient/covered entity must ensure that it uses competent persons to provide interpreter services. Competency does not necessarily mean formal certification as an interpreter, though certification is helpful. On the other hand, competency requires more than self-identification as bilingual. The competency requirement contemplates demonstrated proficiency in both English and the different language, orientation, and training that includes the skills and ethics of interpreting (e.g., issues of confidentiality), fundamental knowledge in both languages of any specialized terms, or concepts peculiar to the recipient/covered entity's program or activity, sensitivity to the LEP person's culture and a demonstrated ability to convey information in both languages, accurately. A recipient/covered entity must ensure that those persons it provides as interpreters are trained and demonstrate competency as interpreters.
- To ensure full and complete access for LEP persons, ETHRA contracts with **Verbatim Solutions**, a telephone language interpreter service that provides on-demand access to competent, qualified interpreters for scores of languages.

▪ **Translation of Written Materials**

- The recipient/covered entity provides translated written materials, including vital documents, for each eligible LEP language group that constitutes ten percent or 3,000, whichever is less, of the population of persons eligible to be served or likely to be directly affected by the recipient/covered entity's program (U.S. Census Bureau data shows that the only group reaching this threshold is Spanish-speaking residents, so essential documents such as the Title VI /Equal Opportunity notices and complaint forms have been translated into Spanish, and are available on the agency's website and upon request);
- Regarding LEP language groups that do not fall within paragraph (A) above but constitute five percent or 1,000, whichever is less, of the population of persons eligible to be served or likely to be directly affected, the recipient/covered entity ensures that, at a minimum,

vital documents are translated into the appropriate non-English languages of such LEP persons as needed via Google Translate. Translation of other documents, if needed, can be provided orally and

- Notwithstanding paragraphs (A) and (B) above, a recipient with fewer than 100 persons in a language group eligible to be served or likely to be directly affected by the recipient/covered entity's program does not translate written materials but provides written notice in the primary language of the LEP language group of the right to receive competent oral translation of written materials.

▪ **Methods for Providing Notice to LEP Persons**

A vital part of a well-functioning compliance program includes having effective methods for notifying LEP persons regarding their right to language assistance and the availability of such assistance free of charge. These methods include, but are not limited to:

- Use of language identification cards, which allow LEP beneficiaries to identify their language needs to staff and for staff to identify the language needs of applicants and clients. To be effective, the cards (e.g., "I speak cards") must invite the LEP person to identify the language he/she speaks, and these are available to all ETHRA employees on the agency's intranet. This identification must be recorded in the LEP person's file;
- Posting and maintaining signs in regularly encountered languages other than English in waiting rooms, reception areas, and other initial points of entry. To be effective, these signs must inform applicants and beneficiaries of their right to free language assistance services and invite them to identify themselves as persons needing such services. Spanish-language versions of these signs are posted throughout the agency's offices.
- Translation of application forms and instructional, informational and other written materials into appropriate non-English languages by competent translators. For LEP persons whose language does not exist

in written form, assistance from an interpreter to explain the contents of the document;

- Uniform procedures for timely and effective telephone communication between staff and LEP persons. This must include instructions for English-speaking employees to obtain assistance from interpreters or bilingual staff when receiving calls from or initiating calls to LEP persons. These instructions are posted on ETHRA's intranet and available to all employees; and
- Inclusion of statements about the services available and the right to free language assistance services, in appropriate non-English languages, in brochures, booklets, outreach and recruitment information, and other materials routinely disseminated to the public. Spanish-language versions of these statements are posted in all agency offices. *(see language notice below)*

▪ **Language Assistance Training**

- ETHRA staff receive annual training on the importance of effectively communicating with LEP clients, along with detailed instructions on using the agency's telephone interpreter service and creating documents translated into other languages. New employees receive this information as part of the required orientation process.

▪ **Monitoring of the Language Assistance Plan**

- The elements of the Language Assistance Plan are monitored and updated annually, including reviews of the latest relevant Census Bureau data and usage of the agency's interpreter service to measure potential changes in the prevalence of second languages in the area. This review includes an update of the Four-Factor Analysis to track the usage of second languages in the area.



Do you need language assistance to apply for or effectively use an ETHRA Program?

Professional translation services are available at no cost to you. Any ETHRA employee can assist you with this upon request.

¿Necesita ayuda con el idioma para solicitar o e ffectively utilizar un Programa Ethra?

Servicios de traducción profesional están disponibles sin costo alguno para usted.

Cualquier empleado Ethra le puede ayudar con esta petición.

Limited English Proficiency Four Factor Analysis (2025)

The most recent U.S. Census Bureau data shows that a relatively small percentage of the population served by ETHRA's various programs speaks little or no English. The majority of these individuals are concentrated in Hamblen, Loudon, Knox, and Sevier Counties, with individuals speaking English "less than well" at rates of 8.5% for Hamblen, 3.5% for Loudon and Knox, and 5% for Sevier. Many other counties in this service area have statistically negligible LEP populations (for example, Scott at 0.3% and Campbell at 0.5%).

The latest Census data (*see below*, effective April 1, 2025) show that Spanish-speaking individuals comprise the largest category of families who speak a language other than, or in addition to, English. Most of these individuals live in Knox County (22,015). Most rural counties have relatively few individuals who speak languages other than English (for example, 102 in Hancock and 98 in Scott).

The number of individuals who "speak English less than well" ranges from a high of 16,742 in Knox County (3.5% of the population) to a limited number in counties such as Morgan (62) and Hancock (37). Spanish is the most frequently encountered language spoken by those who "speak English less than well." In Knox County, approximately 10,959 Spanish speakers reported speaking English less than well. Loudon County also has a relatively large

community of Spanish-speaking individuals who do not speak English well (1784).

Two other categories of languages are encountered to varying degrees in our service area (“Other Indo-European” and “Asian/Pacific Islander”) among those who speak English less than well. This includes approximately 3,112 Asian/Pacific Island language speakers in Knox County and 1,187 individuals whose primary language is another Indo-European language. Those speaking the languages in these categories who also have difficulty with English are encountered much less frequently in our more rural counties. For example, no Asian/Pacific Islander speakers with limited English proficiency lived in Campbell County; only three were reported in Cocke. There were also no individuals in Hancock County who spoke another Indo-European language and reported difficulty with English.

An internal review of data from Public Transit and other agency programs reveals statistically small but consistent contact with LEP clients. The agency’s provider of telephone interpreter services is Verbatim Solutions, and various programs utilize this service regularly. There were approximately 126 instances in calendar year 2025, including 108 usages by the Transportation Department. Spanish was encountered 124 times, with Arabic and Bengali being involved in the other two calls.

Based on our analysis of the latest demographic data from the U.S. Census Bureau (*see below*) and the demonstrated frequency of contact with LEP

clients, the program's most essential documents have been translated into Spanish. These include the agency's Title VI and Equal Opportunity notices, complaint forms, and complaint procedures.

With current online software such as Google Translate, documents can be uploaded and instantly translated into almost any other language on an as-needed basis. Additionally, our telephone translation service is available to all employees 24/7 to assist LEP clients and applicants.

As an agency receiving federal and state funds, effectively serving all clients, including the LEP population, is paramount. Although these expenses are tracked, no budgetary limit is imposed due to the importance of this mandate.

(Attachment of LEP Data from U.S. Census Bureau effective 4/1/2025)

Language Spoken at Home

Estimate, Margin of Error, Percent, Percentage of Error

Anderson County

Population 5 years and over	73310	45	73310	(X)
English only	69979	466	95.5	0.6
Language other than English	3331	458	4.5	0.6
Speak English less than "very well"	1193	313	1.6	0.4
Spanish	1876	370	2.6	0.5
Speak English less than "very well"	751	254	1.0	0.3
Other Indo-European languages	775	238	1.1	0.3
Speak English less than "very well"	90	55	0.1	0.1
Asian and Pacific Islander languages	577	193	0.8	0.3
Speak English less than "very well"	352	178	0.5	0.2
Other languages	103	81	0.1	0.1

Blount County

Population 5 years and over	134660	464	134660	(X)
English only	129324	1552	96.0	1.1
Language other than English	5336	1499	4.0	1.1
Speak English less than "very well"	2207	749	1.6	0.6
Spanish	N	N	N	N
Speak English less than "very well"	N	N	N	N
Other Indo-European languages	N	N	N	N
Speak English less than "very well"	N	N	N	N
Asian and Pacific Islander languages	N	N	N	N
Speak English less than "very well"	N	N	N	N
Other languages	N	N	N	N

Speak English less than "very well"	N	N	N	N
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Campbell County

Population 5 years and over	37427	38	37427	(X)
English only	37072	136	99.1	0.4
Language other than English	355	135	0.9	0.4
Speak English less than "very well"	179	107	0.5	0.3
Spanish	211	116	0.6	0.3
Speak English less than "very well"	145	89	0.4	0.2
Other Indo-European languages	124	76	0.3	0.2
Speak English less than "very well"	34	53	0.1	0.1
Asian and Pacific Islander languages	20	34	0.1	0.1
Speak English less than "very well"	0	29	0.0	0.1
Other languages	0	29	0.0	0.1
Speak English less than "very well"	0	29	0.0	0.1

Claiborne County

Population 5 years and over	30488	115	30488	(X)
English only	29890	188	98.0	0.5
Language other than English	598	160	2.0	0.5
Speak English less than "very well"	78	70	0.3	0.2
Spanish	173	92	0.6	0.3
Speak English less than "very well"	1	4	0.0	0.1
Other Indo-European languages	135	100	0.4	0.3
Speak English less than "very well"	0	29	0.0	0.1
Asian and Pacific Islander languages	249	106	0.8	0.3
Speak English less than "very well"	72	66	0.2	0.2
Other languages	41	57	0.1	0.2

Speak English less than "very well"	5	14	0.0	0.1
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Cocke County

Population 5 years and over	34405	134	34405	(X)
English only	33574	203	97.6	0.5
Language other than English	831	185	2.4	0.5
Speak English less than "very well"	377	137	1.1	0.4
Spanish	618	153	1.8	0.4
Speak English less than "very well"	291	133	0.8	0.4
Other Indo-European languages	181	104	0.5	0.3
Speak English less than "very well"	71	54	0.2	0.2
Asian and Pacific Islander languages	20	26	0.1	0.1
Speak English less than "very well"	3	7	0.0	0.1
Other languages	12	18	0.0	0.1
Speak English less than "very well"	12	18	0.0	0.1

Grainger County

Population 5 years and over	22816	28	22816	(X)
English only	22305	297	97.8	1.3
Language other than English	511	302	2.2	1.3
Speak English less than "very well"	210	158	0.9	0.7
Spanish	454	293	2.0	1.3
Speak English less than "very well"	185	154	0.8	0.7
Other Indo-European languages	31	30	0.1	0.1
Speak English less than "very well"	0	25	0.0	0.2
Asian and Pacific Islander languages	26	37	0.1	0.2
Speak English less than "very well"	25	37	0.1	0.2
Other languages	0	25	0.0	0.2

Speak English less than "very well"	0	25	0.0	0.2
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Hamblen County

Population 5 years and over	62612	546	62612	(X)
English only	54075	1904	86.4	2.8
Language other than English	8537	1731	13.6	2.8
Speak English less than "very well"	5312	1196	8.5	1.9
Spanish	N	N	N	N
Speak English less than "very well"	N	N	N	N
Other Indo-European languages	N	N	N	N
Speak English less than "very well"	N	N	N	N
Asian and Pacific Islander languages	N	N	N	N
Speak English less than "very well"	N	N	N	N
Other languages	N	N	N	N
Speak English less than "very well"	N	N	N	N

Hancock County

Population 5 years and over	6420	18	6420	(X)
English only	6318	65	98.4	0.9
Language other than English	102	60	1.6	0.9
Speak English less than "very well"	37	33	0.6	0.5
Spanish	36	30	0.6	0.5
Speak English less than "very well"	20	25	0.3	0.4
Other Indo-European languages	17	26	0.3	0.4
Speak English less than "very well"	0	19	0.0	0.7
Asian and Pacific Islander languages	49	51	0.8	0.8
Speak English less than "very well"	17	23	0.3	0.4
Other languages	\0	19	0.0	0.7

Speak English less than "very well"	0	19	0.0	0.0
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Jefferson County

Population 5 years and over	53239	73	53239	(X)
English only	50984	444	95.8	0.8
Language other than English	2255	443	4.2	0.8
Speak English less than "very well"	993	346	1.9	0.6
Spanish	1589	380	3.0	0.7
Speak English less than "very well"	809	331	1.5	0.6
Other Indo-European languages	404	183	0.8	0.3
Speak English less than "very well"	82	77	0.2	0.1
Asian and Pacific Islander languages	139	66	0.3	0.1
Speak English less than "very well"	22	23	0.0	0.1
Other languages	123	186	0.2	0.3
Speak English less than "very well"	80	126	0.2	0.2

Knox County

Population 5 years and over	473865	442	473865	(X)
English only	433373	4137	91.5	0.9
Language other than English	40492	4281	8.5	0.9
Speak English less than "very well"	16742	2910	3.5	0.6
Spanish	22015	2602	4.6	0.5
Speak English less than "very well"	10959	2433	2.3	0.5
Other Indo-European languages	6262	1811	1.3	0.4
Speak English less than "very well"	1187	702	0.3	0.1
Asian and Pacific Islander languages	6683	1215	1.4	0.3
Speak English less than "very well"	3112	899	0.7	0.2
Other languages	5532	2466	1.2	0.5

Speak English less than "very well"	1484	951	0.3	0.2
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Loudon County

Population 5 years and over	54372	49	54372	(X)
English only	50224	491	92.4	0.9
Language other than English	4148	485	7.6	0.9
Speak English less than "very well"	1895	377	3.5	0.7
Spanish	3470	421	6.4	0.8
Speak English less than "very well"	1784	357	3.3	0.7
Other Indo-European languages	548	229	1.0	0.4
Speak English less than "very well"	77	67	0.1	0.1
Asian and Pacific Islander languages	105	94	0.2	0.2
Speak English less than "very well"	19	33	0.0	0.1
Other languages	25	29	0.0	0.1
Speak English less than "very well"	15	24	0.0	0.1

Monroe County

Population 5 years and over	44698	20	44698	(X)
English only	42535	519	95.2	1.2
Language other than English	2163	522	4.8	1.2
Speak English less than "very well"	800	387	1.8	0.9
Spanish	1420	310	3.2	0.7
Speak English less than "very well"	521	139	1.2	0.3
Other Indo-European languages	578	438	1.3	1.0
Speak English less than "very well"	259	354	0.6	0.8
Asian and Pacific Islander languages	97	64	0.2	0.1
Speak English less than "very well"	20	31	0.0	0.1
Other languages	68	67	0.2	0.1

Speak English less than "very well"	0	29	0.0	0.1
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Morgan County

Population 5 years and over	20222	18	20222	(X)
English only	19275	483	95.3	2.4
Language other than English	947	484	4.7	2.4
Speak English less than "very well"	62	49	0.3	0.2
Spanish	329	204	1.6	1.0
Speak English less than "very well"	59	49	0.3	0.2
Other Indo-European languages	607	422	3.0	2.1
Speak English less than "very well"	0	25	0.0	0.2
Asian and Pacific Islander languages	3	5	0.0	0.1
Speak English less than "very well"	3	5	0.0	0.1
Other languages	8	13	0.0	0.1
Speak English less than "very well"	0	25	0.0	0.2

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Roane County

Population 5 years and over	51971	107	51971	(X)
English only	50527	431	97.2	0.8
Language other than English	1444	395	2.8	0.8
Speak English less than "very well"	456	153	0.9	0.3
Spanish	541	230	1.0	0.4
Speak English less than "very well"	209	133	0.4	0.3
Other Indo-European languages	502	220	1.0	0.4
Speak English less than "very well"	137	98	0.3	0.2
Asian and Pacific Islander languages	328	208	0.6	0.4
Speak English less than "very well"	83	73	0.2	0.1
Other languages	73	66	0.1	0.1

Speak English less than "very well"	27	38	0.1	0.1
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Scott County

Population 5 years and over	20651	37	20651	(X)
English only	20553	48	99.5	0.2
Language other than English	98	35	0.5	0.2
Speak English less than "very well"	63	40	0.3	0.2
Spanish	40	27	0.2	0.1
Speak English less than "very well"	16	23	0.1	0.1
Other Indo-European languages	1	2	0.0	0.1
Speak English less than "very well"	0	25	0.0	0.2
Asian and Pacific Islander languages	57	21	0.3	0.1
Speak English less than "very well"	47	33	0.2	0.2
Other languages	0	25	0.0	0.2
Speak English less than "very well"	0	25	0.0	0.2

Sevier County

Population 5 years and over	93789	1606	93789	(X)
English only	84849	1299	90.5	2.0
Language other than English	8940	1992	9.5	2.0
Speak English less than "very well"	4712	960	5.0	1.1
Spanish	N	N	N	N
Speak English less than "very well"	N	N	N	N
Other Indo-European languages	N	N	N	N
Speak English less than "very well"	N	N	N	N
Asian and Pacific Islander languages	N	N	N	N
Speak English less than "very well"	N	N	N	N
Other languages	N	N	N	N

Speak English less than "very well"	N	N	N	N
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Union County

Population 5 years and over	19081	41	19081	(X)
English only	18720	143	98.1	0.7
Language other than English	361	131	1.9	0.7
Speak English less than "very well"	59	47	0.3	0.2
Spanish	256	120	1.3	0.6
Speak English less than "very well"	44	40	0.2	0.2
Other Indo-European languages	102	59	0.5	0.3
Speak English less than "very well"	15	25	0.1	0.1
Asian and Pacific Islander languages	0	25	0.0	0.2
Speak English less than "very well"	0	25	0.0	0.2
Other languages	3	7	0.0	0.1
Speak English less than "very well"	0	25	0.0	0.2

American Community Survey, 2023: ACS 5-Year Estimates Data Profiles, effective April 2025

<https://data.census.gov/table?q=DP02&g=050XX00US47173>

Title VI Requirements for Fixed Route Service Providers (Service Standards and Policies)

(East Tennessee Human Resource Agency - LAKEWAY Transit)

1. Vehicle Load Standard: 90% or more of all vehicle loads during any service period should not exceed the assigned vehicle's seating capacity by design,

Vehicle Type	Average Passenger Capacity		
	Seated	Standing	Total
23-foot Cutaway 12 + 2	14	-0-	14

2. Vehicle Headways Standard: Headways will be broken down by service type as follows, with a system-wide average of less than or equal to 50 minutes.
 1. Orange Route Headways (major route serving the main corridors) an average of 30 minutes.
 2. Blue Route Headways (secondary route) an average of 60 minutes.
 3. Green Route Headways (secondary route) an average of 60 minutes.
3. On-Time Performance Standard: A vehicle is considered on time if it departs a scheduled time point no more than 1 minute early and no more than 5 minutes late. LAKEWAY Transit's performance objective is to be 90% on time or greater. ETHRA continuously monitors on-time performance standards.
4. Service Availability Standard: East Tennessee Human Resource Agency (ETHRA) will distribute transit services so that 90% of all residents in the Lakeway Transit's fixed route service area are within a ½ mile walk of a bus stop.

5. Vehicle Assignment Policy: Vehicles will be assigned to routes of the fixed route service area so that the average age of the fleet serving each route does not exceed the average fleet age by more than 5 years. Vehicle assignments take into account the operational characteristics of vehicles of various lengths, which are matched to the operational characteristics of the route. Service Routes with lower ridership may be assigned smaller vehicles than major routes. Some routes requiring tight turns on narrow streets may be assigned smaller vehicles able to navigate the route.
6. Transit Amenities Policy: Stops shall be established at key locations along each route, although the exact location of the stop will be based upon the examination of key factors, such as commercial, public areas, and residential, access and safety. Bus stop amenities, such as benches and shelters, shall be determined based on ridership levels, distribution of other amenities in the area, available right-of-way, adjacent land use, and local or private funding. Based on the above-stated criteria, amenities should be distributed on an equitable basis within the LAKEWAY fixed route service area.

This Title VI Program for the Federal Transit Administration was approved by the East Tennessee Human Resource Agency's Board of Directors on September 9, 2025.