



BrightRidge®

Limited English Proficiency (LEP) Plan
Title VI Documentation

March 2019

I. Introduction

This *Limited English Proficiency Plan* has been prepared to address BRIGHTRIDGE's responsibilities as they relate to the needs of individuals with limited English proficiency (LEP). The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, U.S.C. 2000d, et seq., and Executive Order 13166 and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

A. Plan Summary

As a recipient of federal funds, BRIGHTRIDGE is required to take reasonable steps to ensure meaningful access to our services by LEP persons. This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training, and how to notify LEP persons that assistance is available. The following four-factor LEP analysis has been used to determine what steps BRIGHTRIDGE will take to ensure that vital information, both written and verbal, which is provided in English is translated into the non-English language of regularly encountered LEP groups served by our company:

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter BRIGHTRIDGE for electric service.
2. The frequency with which LEP persons come in contact with BRIGHTRIDGE for electric service.
3. The nature and importance of programs, activities or services provided by BRIGHTRIDGE to the LEP population.
4. The resources available to BRIGHTRIDGE and overall cost to provide LEP assistance.

II. Meaningful Access: Four-Factor Analysis

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter BRIGHTRIDGE for electric service.

BRIGHTRIDGE reviewed the information available for Washington County on City-Data.com/county/Washington_County-TN.html on February 21, 2019 and determined the following:

Washington County Tennessee Summary of People with Limited English Proficiency (Based on 2016 Data)

Total County Population: 127,440

Races in Washington County:

White Non-Hispanic Alone	89.1%
Black Non-Hispanic Alone	3.9%
Hispanic or Latino	3.3%
Two or more races	1.8%

Asian Alone 1.6%

Resident who speak English at home	96.5%
Residents who speak Spanish at home	2.4%
Of the 2.4% who speak Spanish at home:	
Speak English, very well	83%
Speak English, well	12%
Speak English, not well	4%
Speak no English	1%
Resident who speak other Indo-European language at home	0.9%
Of the 1.1% who speak Indo-European at home:	
Speak English, very well	80%
Speak English, well	13%
Speak English, not well	5%
Speak no English	1%
Residents who speak Asian or Pacific Island language at home	0.9%
Of the .4% who speak Asian or Pacific Island at home:	
Speak English, very well	75%
Speak English, well	21%
Speak English, not well	4%
Speak no English	0%
Residents who speak other language at home	0.3%
Of the .1% who speak other language at home	
Speak English, very well	87%
Speak English, well	8%
Speak English, not well	5%
Speak no English	0%

2. The frequency with which LEP persons come in contact with BRIGHTRIDGE for service.

BRIGHTRIDGE tracks the frequency with which staff has contact with LEP persons. In the previous year 2018, BRIGHTRIDGE bilingual staff assisted 144 customers for an average of 12/month. Based on this review and the small number of people that in fact fall into this category we estimate that our staff has had minimal contact with LEP persons. There have been no reports of issues arising where our staff has been unable to meet the needs of an LEP customer.

3. The nature and importance of programs, activities or services provided by BRIGHTRIDGE to the LEP population.

A. BRIGHTRIDGE provides electric service to all of Washington County and a small portion of 3 surrounding counties; Carter, Greene and Sullivan Counties. However, Washington County customers make up 87.5% of our customers. Electricity is a vital

service that all people in the service area use. All citizens use our services including those that have Limited English Proficiency.

B. As of the date of this document, BRIGHTRIDGE is in the beginning stages of a newly adopted business plan to offer Broadband services to our service area. The plan will include a “Triple Play” offering to include internet, telephone and television. The plan calls for BRIGHTRIDGE to provide these services to 75% of our service area within an 8 year time frame. BRIGHTRIDGE recognizes that Broadband services have become the modern day must have utility and the demand for high quality, high-speed, reliable broadband has and will continue to grow as more of the economy is dependent on high quality, high-speed broadband. BRIGHTRIDGE will provide the same level of service for LEP customers of our Broadband service as is provided to those using our electric service.

4. The resources available to BRIGHTRIDGE and overall cost to provide LEP assistance.

BRIGHTRIDGE currently employs two full-time employees in the Customer Support Department who are bilingual; both speak fluent Spanish and English. This is at no extra cost to the company because both employees fulfill the duties of their job description in addition to having the ability to interpret if called upon. Our application instructions for electric and broadband services are available in Spanish on our website and our automated telephone system gives instruction for Spanish speaking callers. Customer Service Representatives have also been trained on the use of Google Translate and our Call Center Services Contractor for Broadband services maintains a subscription for multi-lingual interpreter conferencing services. The link to Google Translate is located on our website and will allow users to translate the full website to the language of their choice. These are relatively low-cost solutions.

III. Language Assistance

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to BRIGHTRIDGE services. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language. BRIGHTRIDGE will normally utilize interpretation services provided by our bilingual employees, contractor subscriptions to multi-lingual interpreter conferencing services, or a web-based program such as Google Translate if an interpreter is not available.

BRIGHTRIDGE will utilize the interpretation services based on the need expressed by the individual. Employees of the Customer Support Department have been trained on how to identify a LEP person and know how to obtain our various methods of interpretation services.

A. Language Assistance Measures

Since there are a very low percentage of customers that qualify as LEP according the U.S. Census, BRIGHTRIDGE presently does not take any additional measures beyond those outlined above. BRIGHTRIDGE will monitor the effectiveness of this program and will provide interpretation methods for other languages as determined necessary by BRIGHTRIDGE to ensure people that qualify as LEP are provided access to our services.

Other measures will be evaluated as the need arises, but the primary language assistance measure will continue to be the translated instructions provided via the telephone system, the company website, a web-based interpretation service such as Google Translate, and on-site bilingual employees.

IV. Staff Training

The following training is provided to BRIGHTRIDGE Customer Support employees:

1. Information on LEP responsibilities.
2. Contact information for bilingual employees.
3. Steps to be taken in tracking of language assistance requests.
4. Location of translated information on BRIGHTRIDGE website.
5. Instructions on translated menu option via telephone system.

V. Translation of Documents

Full instructions for customers applying for service are available in Spanish on our website. The link to Google Translate is located on our website and will allow users to translate the full website to the language of their choice.

VI. Formal Interpreters

BRIGHTRIDGE will continue to work through bilingual employees and translated information via our company website as the main source of formal interpreters to assist customers with application for service.

VII. Informal Interpreters

Informal interpreters may include the family members, friends, legal guardians, service representatives or advocates of the LEP customer. BRIGHTRIDGE staff will determine whether it is appropriate to rely on informal interpreters, depending upon the circumstances and subject matter of the communication. However, in many circumstances, informal interpreters, especially children, are not competent to provide quality and accurate interpretations. There may be issues of confidentiality, competency or conflict of interest. These informal interpreters will be used on a case by case basis.

An LEP person may use an informal interpreter of his or her own choosing and at their expense, either in place or as a supplement to translation services BRIGHTRIDGE offers.

VIII. Outside Resources

Outside resources may include community volunteers and may be used at public or informal meetings or events.

IX. Monitoring and Updating

This plan is designed to be flexible and should be viewed as a work in progress. As such it is important to consider whether new documents and services need to be made accessible for LEP persons. BRIGHTRIDGE will monitor changes in demographics and types of services and the LEP will be reviewed periodically to assess and update the plan as needed.

X. Dissemination of the BRIGHTRIDGE LEP Plan

The plan will be posted on the BRIGHTRIDGE website at BRIGHTRIDGE.com. Questions or comments should be submitted to the Human Resources Department of BRIGHTRIDGE at:

BRIGHTRIDGE
Attn: Human Resources
PO Box 1636
Johnson City, TN 37605