



**AREA IV AGENCY ON  
AGING AND COMMUNITY  
ACTION PROGRAMS, INC.  
TRANSIT TITLE VI POLICY**

January 2022

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## I. INTRODUCTION

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### **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC. 'S COMMITMENT TO CIVIL RIGHTS**

This January 2022, of **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** Transit's Title VI Program has been prepared to ensure that the level and quality of **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC. 's demand response services** are provided in a nondiscriminatory manner and that the opportunity for full and fair participation is offered to **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC. 's** riders and other community members. Additionally, through this program, **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** has examined the need for services and materials for persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English.

While it is a matter of principle that **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** is committed to ensuring that no person is excluded from participation in, or denied the benefits of, or subjected to discrimination in the receipt of any of **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC. 's** services on the basis of race, color, or national origin. The contents of this program have been prepared in accordance with Section 601 of Title VI of the Civil Rights Act of 1964 and Executive Order 13116 (Improving Access to Services for Persons with Limited English Proficiency) and other statutes and authorities that prohibit discrimination in any Federally assisted program or service.

Under the Civil Rights Act of 1964, and as a recipient of federal funding under the programs of the Federal Transit Administration (FTA) of the U.S. Department of Transportation (US DOT), **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** has an obligation to ensure that:

- ◆ The benefits of its bus services are shared equitably throughout the service area;
- ◆ The level and quality of bus services are sufficient to provide equal access to all riders in its service area;
- ◆ No one is precluded from participating in **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC. 's** service planning and development process;
- ◆ Decisions regarding service changes or facility locations are made without regard to race, color, or national origin and that development and urban renewal benefitting a community as a whole not be unjustifiably purchased through the disproportionate allocation of its adverse environmental and health burdens on the community's minority population; and
- ◆ A program is in place for correcting any discrimination, whether intentional or unintentional.

## II. GENERAL REQUIREMENTS

### Notice to the Public

To make **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** riders aware of its commitment to Title VI compliance, and their right to file a civil rights complaint, **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** has presented the following information, in both English and **Spanish** on its **website ride guide**.

### *Your Civil Rights*

**AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** Transit (**AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.**) operates its programs and services without regard to race, color, or national origin, in accordance with Title VI of the Civil Rights Act and other statutes and authorities that prohibit discrimination in federally assisted programs and activities. Any person who believes they have been aggrieved by any unlawful discriminatory practice under Title IV may file a complaint with **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** For more information on **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.**'s civil rights program and the procedures to file a complaint, please contact [**AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC. 765-447-7683**]; email: [info@areaivagency.org](mailto:info@areaivagency.org) or visit our administrative office at 660 N. 36<sup>th</sup> Street, Lafayette, IN from 8:00 AM – 4:30 PM. A complaint may also be filed directly with the FTA, Office of Civil Rights, 1200 New Jersey Avenue SE, Washington DC 20590. For more information about **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** programs and services, visit [www.areaivagency.org](http://www.areaivagency.org). If information is needed in another language, please contact **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** at **765-447-7683**.

### Discrimination Complaint Procedures

**AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** has established a process for riders to file a complaint under Title VI. Any person who believes that she or he has been discriminated against on the basis of race, color, or national origin by **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** may file a Title IV complaint by completing and submitting the agency's Title VI Complaint available at our administrative offices or on our website [www.areaivagency.org](http://www.areaivagency.org).

**AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** will notify INDOT of all formal complaints within five business days of receiving the complaint.

**AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** investigates complaints received no more than **180 days after** the alleged incident. **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** will process complaints that are complete. Once the complaint is received, **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** will review it and the complainant will receive an acknowledgement letter informing them whether

the complaint will be investigated by **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.**

**AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** has up to **thirty days** to investigate the complaint. If more information is needed to resolve the case, the **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** may contact the complainant. The complainant has thirty days from the date of the letter to send requested information to the investigator assigned to the case.

If **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.**'s investigator is not contacted by the complainant or does not receive the additional Information within thirty days, **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, one of two letters will be issued to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.

A LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur. If the complainant wishes to appeal the decision, she/he has ten days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration, at:  
Federal Transit Administration  
Office of Civil Rights  
1200 New Jersey Avenue SE  
Washington, DC 20590

# DISCRIMINATION COMPLAINT FORM

## TITLE VI AND ADA

<b>Section I:</b>		
Name:		
Address:		
Telephone (Home):	Telephone (Work):	
Electronic Mail Address:		
Accessible Format Requirements?	<input type="checkbox"/> Large Print	<input type="checkbox"/> Audio Tape
	<input type="checkbox"/> TDD	<input type="checkbox"/> Other
<b>Section II:</b>		
Are you filing this complaint on your own behalf?	<input type="checkbox"/> Yes*	<input type="checkbox"/> No
<i>*If you answered "yes" to this question, go to <b>Section III</b>.</i>		
If not, please supply the name and relationship of the person for whom you are complaining.		
Please explain why you have filed for a third party:		
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Section III:</b>		
I believe the discrimination I experienced was based on (check all that apply):		
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin <input type="checkbox"/> Disability		
Date of Alleged Discrimination (Month, Day, Year): _____		
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.		
<hr/> <hr/> <hr/>		
<b>Section IV:</b>		
Have you previously filed a Discrimination Complaint	<input type="checkbox"/> Yes	<input type="checkbox"/> No

with this agency?		
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If yes, please provide any reference information regarding your previous complaint.

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**Section V:**

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?

- Yes                       No

If yes, check all that apply:

- Federal Agency: \_\_\_\_\_  
 Federal Court: \_\_\_\_\_       State Agency: \_\_\_\_\_  
 State Court: \_\_\_\_\_       Local Agency: \_\_\_\_\_

Please provide information about a contact person at the agency/court where the complaint was filed.

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Agency: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone: \_\_\_\_\_

**Section VI:**

Name of agency complaint is against: \_\_\_\_\_

Name of person complaint is against: \_\_\_\_\_

Title: \_\_\_\_\_

Location: \_\_\_\_\_

Telephone Number (if available): \_\_\_\_\_

You may attach any written materials or other information that you think is relevant to your complaint. Your signature and date are **required** below:

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

**Please submit this form in person at the address below, or mail this form to:**

**AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS,  
INC.  
DEPUTY DIRECTOR OF COMMUNITY ACTION PROGRAMS  
660 N. 36<sup>TH</sup> STREET, LAFAYETTE, IN 47905**

## **The Procedure**

If you believe that you have received discriminatory treatment by the AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC. on the basis of race, color, or national origin you have the right to file a complaint with the **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC. Deputy Director of Community Action Programs.**

### **Methods of filing a complaint:**

Complete the Complaint Form, and send it to:

**Deputy Director of Community Action Programs  
Area IV Agency on Aging and Community Action Programs, Inc.  
660 N. 36<sup>th</sup> Street  
Lafayette, IN 46905**

Verbal complaints are accepted. To make a verbal complaint, call 765-447-7683 and ask for **the Deputy Director of Community Action Programs.** Any language barriers or LEP assistance will be identified through the information and referral process. A translator will be made available to communicate. Additional tools will be used for communication including use of [www.languageline.com](http://www.languageline.com) for translations and interpretations.

**AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** investigates complaints received no more than **180 days after** the alleged incident. **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** will process complaints that are complete. Once the complaint is received, **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** will review it and the complainant will receive an acknowledgement letter informing them whether the complaint will be investigated by **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.**

**AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** has up to **thirty days** to investigate the complaint. If more information is needed to resolve the case, the **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** may contact the complainant. The complainant has thirty days from the date of the letter to send requested information to the investigator assigned to the case.

If **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.**'s investigator is not contacted by the complainant or does not receive the additional Information within thirty days, **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, one of two letters will be issued to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.

A LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur. If the complainant wishes to appeal the decision, she/he has ten days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration, at:  
 Federal Transit Administration  
 Office of Civil Rights  
 1200 New Jersey Avenue SE  
 Washington, DC 20590

**Active Lawsuits, Complaints or Inquiries Alleging Discrimination**

**AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** maintains a list of active investigations conducted by FTA and entities other than FTA, including lawsuits and complaints naming **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** that allege discrimination on the basis of race, color, or national origin. This list includes the date that the transit-related Title VI investigation, lawsuit or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit or complaint, and actions taken by **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** in response, or final findings related to the investigation, lawsuit, or complaint.

As of the writing of this program, there are **zero** complaints pending which allege discrimination on the grounds of race, color, or national origin, or any other form of discrimination.

**Active Lawsuits, Complaints or Inquiries Alleging Discrimination**

Type (Investigation, Lawsuit, Complaint)	Date	Summary of Complaint	Status	Action(s) Taken

### **III. AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC. 'S PUBLIC PARTICIPATION PLAN**

#### **Key Principles**

**AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** 's Public Participation Plan (PPP) has been prepared to ensure that no one is precluded from participating in **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** 's service planning and development process. It ensures that:

- Potentially affected community members will have an appropriate opportunity to participate in decisions about a proposed activity that will affect their environment and/or health;
- The public's contribution can and will influence **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** 's decision making;
- The concerns of all participants involved will be considered in the decision-making process; and,
- **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** will seek out and facilitate the involvement of those potentially affected.

Through an open public process, **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** has developed a public participation plan to encourage and guide public involvement efforts and enhance access to **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** 's transportation decision-making process by minority and Limited English Proficient (LEP) populations. The public participation plan describes the overall goals, guiding

LEP refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all.
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principles and outreach methods that **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** uses to reach its riders.

#### **Limited English Proficient (LEP) Goals of the Public Participation Plan**

The overarching goals of **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** 's PPP include:

- Clarity in Potential for Influence - The process clearly identifies and communicates where and how participants can have influence and direct impact on decision making.
- Consistent Commitment - **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** communicates regularly, develops trust with riders and our community and builds community capacity to provide public input.
- Diversity - Participants represent a range of socioeconomic, ethnic and cultural perspectives, with representative participants including residents from low-income neighborhoods, ethnic communities and residents with Limited English Proficiency

- Accessibility - Every reasonable effort is made to ensure that opportunities to participate are physically, geographically, temporally, linguistically, and culturally accessible.
- Relevance - Issues are framed in such a way that the significance and potential effect is understood by participants.
- Participant Satisfaction - People who take the time to participate feel it is worth the effort to join the discussion and provide feedback.
- Partnerships - **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** develops and maintains partnerships with communities through the methods described in its public participation plan.
- Quality Input and Participation - Those comments received by **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** are useful, relevant and constructive, contributing to better plans, projects, strategies and decisions.

### **Objectives of the Public Participation Plan**

**AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** 's Public Participation Plan is based on the following principles:

- Flexibility - The engagement process will accommodate participation in a variety of ways and be adjusted as needed.
- Inclusiveness - **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** will proactively reach out to and engage low income, minority and LEP populations from the **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** service area.
- Respect - All feedback will be given careful and respectful consideration.
- Proactive and Timeliness - Participation methods will allow for early involvement and be ongoing.
- Clear, Focused and Understandable - Participation methods will have a clear purpose and use for the input and will be described in language that is easy to understand.
- Honest and Transparent - Information provided will be accurate, trustworthy, and complete.
- Responsiveness – **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** will respond and incorporate appropriate public comments into transportation decisions.
- Accessibility – Meetings will be held in locations which are fully accessible and welcoming to all area residents, including, but not limited to, low-income and minority members of the public and in locations relevant to the topics being presented and discussed.

**AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** will use its public participation plan when considering all fare changes, major modifications to routes and schedules, and other transit planning projects when:

- A fare increase/decrease or significant change in the method of fare payment is being considered;
- Advance reservation policy is reduced or increased;
- Area for deviating to pick up passengers is changed;
- A new route is established;

- An existing route is proposed for elimination;
- Considering the total discontinuance of service on any line or group of lines on any given day when service is currently offered;
- Any system-wide change in service hours that exceeds (plus or minus) **10%** of current total service hours;
- Routing on any given route or group of routes that affects more than **25%** of the riders using the affected route(s); or
- Schedules are changed on any given route or group of routes that reduces the total number of one-way bus trips by more than **25%** of the current number of bus trips.
- For minor schedule and service changes not rising to the level of those above, **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** will post service change notices on appropriate buses and stops **sixty days** in advance of the change date.

## **IV. AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC. 'S PUBLIC PARTICIPATION PROCESS**

### **Outreach Efforts – Alerting Riders and Encouraging Engagement**

**AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** 's PPP includes many new mediums extending beyond the traditional approach which relied on legal notices and intermittent media coverage. While **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** maintains these elements to its outreach program along with traditional seat-drop flyers, **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** has availed itself of the communication methods more widely used by members of our community and riders.

While there may be minor variation in the outreach process from time-to-time, the outline below provides the general steps for engaging riders in the decision-making process using a fare or service change as an example.

1. A service/fare change proposal is developed internally or as a result of public comment;
2. Proposals are reviewed by **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC. 's Transportation Advisory Committee (TAC)**;
3. A Title VI review of the proposal is conducted;
4. If required, authorization from the **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** Board of **Commissioners** is sought to proceed to a public comment period;
5. Public outreach venues, dates and times are determined with consideration of the proposed changes and their impact on specific locations/populations within the **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** service area;
6. Bilingual **English and Spanish** public outreach materials and a program are developed;
7. Outreach In advance of public information sessions is released (using tool-box of mediums listed below);
  1. An Email is transmitted to **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** community partners;
  2. The public comment period ends;

3. The **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** Board of Directors **will receive a summary package detailing the outcome of the public participation process along with staff recommendations;**
4. The final service/fare change date is set;
5. Outreach is conducted in advance of any service or fare change;
6. Bilingual system timetable and website updated in advance of the proposed change.

### **Selection of Meeting Locations**

When determining locations and schedules for public meetings, **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** will:

- Schedule meetings at times and locations that are convenient and accessible for minority and LEP communities;
- Employ different meeting sizes and formats including town hall type meeting formats;
- Coordinate with community organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities;
- Ensure that transportation is available to and from the meeting if requested;
- Provide opportunities for public participation through means other than written communication, such as one-on-one interviews or use of audio or video recording devices to capture oral comments.

### **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC. Mediums**

- Outdoor – Advertising on-board buses (interior and exterior) and in bus shelters
- Website – AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC. has assembled a comprehensive website with automatic alerts
- Web-Based Feedback - (Report It, Shout It, Suggest It, How Are We Doing, and Tell Us Your Story).
- Social Media – AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC. has used Facebook and Twitter to help engage community
- Newsletters – Area IV Agency on Aging and Community Action Programs, Inc. publishes a quarterly newsletter
- Seat Drops, On-board Flyers – AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC. regularly uses seat drops and flyers to provide riders with details of service changes and schedules of public meetings and hearings.
- Direct Mail to Community Partners
- Public Information Sessions
- Public Hearings
- Legal Notices

## Addressing Comments

### *The Incorporation of Public Comments into Decisions*

All comments received through the public participation plan are given careful, thoughtful consideration. Because there are a number of different ways such as **mail, email, social media, and/or public meetings**, riders or members of the community can comment on proposed service or fare changes, all comments are assembled into a single document for presentation to the **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** Board of Directors for consideration.

## Identification of Stakeholders

### *Our Community Partners*

Stakeholders are those who are either directly or indirectly affected by a plan, or the recommendations of the plan. Those who may be adversely affected, or who may be denied benefits of a plan's recommendation(s), are of particular interest in the identification of specific stakeholders. Stakeholders can come from a number of groups including general citizens/residents, minority and low-income persons, public agencies, and private organizations and businesses. While stakeholders may vary based on the plan or program being considered, **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** has assembled a listing of stakeholders with whom we regularly communicate through email and direct mail. A complete list of **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.**'s community stakeholders can be obtained by contacting **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.**

### *Stakeholder List*

Any community organization or person can be added to the **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** stakeholder list and receive regular communications regarding service changes by contacting the **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** administrative office at 765-447-7683. Local organizations and businesses can also request that a speaker from **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** attend their regular meeting at the same number or through the **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** website - [www.areaivagency.org](http://www.areaivagency.org).

## **V. DECISION MAKING BODIES**

### *Non-Elected Committees and Councils*

At **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.**, decisions regarding policy, service changes, fares, capital programming and facility locations are made by a **municipally appointed Board of Commissioners**. **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.**'s **Board of Commissioners** is composed of members representing Tippecanoe

County. Transportation Advisory Committee (TAC) who hold ongoing meetings to help to guide decisions regarding routes, schedules, and other topics important to the community and our riders. Meetings of the **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC., Board of Commissioners** and **the Transportation Advisory Committee** are always open to the public.

**AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** currently provides demand response, curb to curb transit service to **100%** of all residents of **non-urbanized Tippecanoe County.**

## **VI. SUMMARY OF CHANGES**

### **Service Change Evaluations Since 1/10/2020**

Since **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** 's 2020 Title VI Plan Submission there have been **no changes** in **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** 's fare structure. There have been **NO** service changes.

These changes, the associated outreach and Title VI determination and **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** Board Approval are available by contacting **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.**

### **Program Specific Requirements**

#### **Title VI Monitoring - 1/10/2020** Title VI Plan

The results of the ongoing monitoring of service standards as defined in the **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** 's [1/10/2020] program can be obtained by contacting **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.**

#### **Equity Analysis for Facility**

**No consideration being made at this time. Our vehicles are serviced by Lafayette City Bus and parked on the area IV Parking Lot in Lafayette, IN**

#### **Demographic Service Profile**

Because **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** operates fewer than 50 buses in peak service, a demographic service profile was not prepared for this plan update.

## **VII. GRANTS, REVIEWS AND CERTIFICATIONS**

### **Pending Applications for Financial Assistance**

#### **5311 Operating/5339 Capital CY2022 Application**

### **Civil Rights Compliance Reviews in the Past 3 Years**

**AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** has not been the subject of any such reviews since its **2020** submission.

**Recent Annual Certifications and Assurances**

**AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** executed its most recent Certifications and Assurances to the FTA and is in the process of executing [2014 or year] certifications and assurances.

**Contact**

For additional information on the **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** Title VI Plan, or its efforts to comply with the Civil Rights Act of 1964 or Executive Order 13166 Improving Access to Services for Persons with Limited English Proficiency, please contact:

**Contact information**

**Deputy Director of Community Action Programs**  
**Area IV Agency on Aging and Community Action Programs, Inc.**  
**660 N. 36<sup>th</sup> Street**  
**Lafayette, IN 46905**

## **VIII. LANGUAGE ASSISTANCE PLAN**

**Improving Access for People with Limited English Proficiency (LEP)**

In order to ensure meaningful access to programs and activities, **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** uses the information obtained in a Four Factor Analysis to determine the specific language services that are appropriate. This analysis helps **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** to determine if it communicates effectively with LEP persons and informs language access planning.

The Four Factor Analysis is a local assessment that considers:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** ;
2. The frequency with which LEP persons come into contact with **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** services and programs;
3. The nature and importance of **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** 's services and programs in people's lives; and
4. The resources available to **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** for LEP outreach, as well as the costs associated with that outreach.

**Factor 1 – Number of LEP Persons in Service Region**

The first step in determining the appropriate components of a Language Assistance Plan is understanding the proportion of LEP persons who may encounter **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** 's services, their literacy skills in English and their native language, the location of their communities and neighborhoods and, more importantly, if any are underserved as a result of a language barrier.

To do this, **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** evaluated the level of English literacy and to what degree people in its service area speak a language other than English and what those languages are. Data for this review is derived from the United States Census and the American Community Survey (2008-2012). Data was reviewed by **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** 's board in its entirety.

**Service Area Overview**

**AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** 's service area encompasses non-urbanized Tippecanoe County (consisting of Americus, Battle Ground, Buck Creek, Clarks Hill, Colburn, Dayton, Montmorenci, Otterbein, Shadeland, Stockwell and West Point) and is home to a population speaking mostly English. Of the total service area population of 9,053, approximately .09% (less than 1%) of residents report speaking English less than very well based on data pulled from Table C16001 of the American Community Survey Census Data . **Visit the link here: <https://data.census.gov/cedsci/>**

<b>Speak English "Less than very well"</b>	<b>Population in the Language Group</b>	<b>Percent of Total Population</b>
All non-English languages	82	.09%



here are many places where **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** riders and members of the LEP population can come into contact with **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** services including the use of demand response buses, calls to customer service representatives, reservation agents and **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** 's outreach materials. An important part of the development of **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** 's Language Access Plan is the assessment of major points of contact, including:

- The use of the bus service (on-board signage, announcements and driver language skills);
- Communication with **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** 's customer service staff;
- Bus pass sales;
- Printed outreach materials;
- Web-based outreach materials;
- Public meetings;
- Local news media (print and radio);
- Automatic, service related audio announcements on-board **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** buses; and

**AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** distributed a language survey to its employees. The objective of the survey was to evaluate the needs of AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC. customers who are not able to communicate in English. The first question asked, In What Way(s) Do You Interact with **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** riders? The chart below illustrates the results.

<b>Method of Interaction</b>	<b>Percent of Responses</b>
Telephone	<u>80%</u>
Face to Face	<u>10%</u>
Email	<u>10%</u>
Fax	<u>0%</u>

Next, the survey asked how often employees come into contact with LEP customers. The chart below outlines the results.

<b>Frequency of Interaction</b>	<b>Percent of Responses</b>
Often	0%
Sometimes	0%
Rarely	25%
Never	75%

Next, the survey asked employees to identify how often they interact with the following languages on a typical workday.

Language	Percent of Interactions
None on a typical workday	

The survey asked, overall, how effective employees are in communicating with Limited English Proficient AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC. passengers. The results are summarized below.

Effectiveness	Percent of Total Responses
Very Effective	0%
Moderately Effective	0%
Less Effective	25%
Unable to Communicate	75%

### Consulting Directly with the LEP Population

In addition to the U.S. Census data, employee survey, and outreach to community partners, AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC. implemented a survey of its riders. A copy of the survey is attached in Appendix A.

## Transportation Customer Satisfaction Survey Results 2021

Transportation Customer Satisfaction Survey Results 2021				
Question	Strongly Agree	Agree	Disagree	Strongly Disagree
1 I would recommend Area IV to others	49	0	1	0
2 I feel welcom and respeded at Area IV	46	0	4	0
3 I feel comfortable asking questions about area IV services	50	0	0	0
4 I feel my feedback is valued	43	7	0	0
5 I need the services offered by Area IV	44	6	0	0
6 When I contact Area IV, I get a response within a satisfactory amount of time	30	15	5	0

**Factor 3 – The Importance of AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC. Service to People’s Lives**

Access to the services provided by **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** are critical to the lives of many in the service area. Many depend on **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.**’s services for access to jobs and for access to essential community services like schools, shopping, and medical appointments. Riders eligible for service under the Americans with Disabilities Act (ADA) require service for the same reasons. Because of the essential nature of the services and the importance of these programs in the lives of many of the region’s residents, there is a need to ensure that language is not a barrier to access.

**Survey Data** - Survey data reflecting trip purpose 92% of the rides currently being provided for Area IV Agency are for medical purposes such as Doctor and Dental Appts., Cancer and Dialysis treatments, eye appts., etc. We do provide rides for groceries, etc. but they are currently less than 10% of our total.

If limited English proficiency is a barrier to using these services, then the consequences for the individual could limit their access to obtain health care, education, or employment. Critical information from **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** which can affect access includes:

- Route and schedule information
- Fare and payment information
- Information regarding making the best use of the system (How To)
- Service announcements
- Safety and security announcements
- Complaint and comment forms
- Outreach related to opportunity for public comments
- Information about demand response services under the ADA and other special programs
- What to do in an emergency (where to look for service change announcements)

**The following notice is posted on all AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC. vehicles.**

The **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** ensures that no person shall, on the grounds of race, color, or national origin be excluded from participating in or denied benefits of or be subjected to discrimination as it relates to the provision of public transportation services provided by the **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.**

Any person who wants additional information on **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.**’s nondiscrimination obligation or believes that he or she individually or as a member of any specific class of persons, has been subjected to discrimination on the basis of

race, color, or national origin may file a complaint with the **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** within 180 days of the date of the alleged discrimination.

To file a complaint contact **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** at **765-774-7683**, website **www.areaivagency.org** or send a letter to **660 N 36<sup>th</sup> Street Lafayette, IN 47905**. A complaint may also be filed directly with the FTA, Office of Civil Rights, 1200 New Jersey Avenue SE, Washington DC 20590.

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La compañía **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** Transit garantiza que ninguna persona, por motivos de raza, color, o origen nacional estén excluida de la participación o negado de los beneficios o ser sujeto de discriminación en respecto a los servicios proveidos de la Autoridad del transporte público.

Cualquier persona que cree que él o ella a título individual o como miembro de una clase específica de personas, ha sido sujeto de discriminación por motivos de raza, color, o origen nacional puede presentar una queja a la compañía **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** dentro de los 180 días siguientes a la fecha de la supuesta discriminación.

Para presentar una queja al **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.**, llame al **765-774-7683**, website **www.areaivagency.org**, o escribe una calta y envía a **660 N 36<sup>th</sup> Street Lafayette, IN 47905**. Se puede presentar una queja directamente ante el FTA, Oficina de Derechos Civiles, 1200 New Jersey Avenue SE, Washington DC 20590.

#### **Factor 4 – Resources and Costs for LEP Outreach**

**AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** has committed resources to improving access to its services and programs for LEP persons.

Today, bilingual information (**English/Language(s)**) is distributed in an extensive number of mediums including the following:

- ◆ A bi-lingual English/Language(s) website
- ◆ A complete bilingual English/Language(s) system timetable
- ◆ A complete bilingual English/Language(s) Rider’s Guide to demand response services (ADA paratransit)
- ◆ Bilingual English/Language(s) outreach materials (seat drops and service change alerts)
- ◆ Bilingual English/Language(s) representation at public meetings
- ◆ Bilingual English/Language(s) customer service representatives
- ◆ Bilingual English/Language(s) Demand Response reservation agents/customer service representatives
- ◆ Bilingual English/Language(s) on-board signage
- ◆ Bilingual English/Language(s) guides and training for **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** drivers.
- ◆ Increased use of Bilingual English/Language(s) Twitter Feeds and Facebook posts (not yet 100%)

- ◆ A bilingual English/Language(s) video on how to use **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** 's new farebox.

To date, the costs associated with these efforts fit within the **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** 's marketing and outreach budget. Costs are predominantly associated with translation services and material production.

## **Outcomes**

### **New tools and alerting riders of language assistance**

Following the "Four Factor Analysis", **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** concluded that, while there is currently extensive outreach and materials for the Language(s) speaking LEP population of the service area, additional services would assist other LEP populations regardless of the total population in the region. These include:

1. Adding Google Translate to the **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** website to use with customers/drivers but using a speaking translator for vital documents;
2. Adding translation services for telephone communications with customer service representatives;
3. Assigning new staff charged with improvement community engagement; and
4. Creating a page with multiple languages for print and web-based posting indicating how **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** provides language assistance.
5. Use a smart phone with translation application.

The above items are in process:

Additional recommendations gleaned from the internal staff survey include:

1. Offering employees conversational or transit specific language training
2. Recruiting more multilingual employees.
3. A multi-language touch screen monitor where passengers can access bus route information at the terminal.
4. On-board announcements in different languages.

**AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** is considering all these items and other methods that become available.

## **Oversight**

### **Monitoring, Evaluating and Updating the Language Assistance Plan and Public Participation Process**

The monitoring of the Language Assistance Plan will include:

- ◆ Annual reviews of regional census data for changing patterns of LEP populations;
- ◆ Update the policy every three years;
- ◆ Ongoing collaboration with regional partners;
- ◆ Ongoing review of Google Translate requests at **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.**'s website; and
- ◆ Post Event Assessments (PEA)

### **Post-Event Assessments**

Following service changes, fare increases and planning projects, transportation staff members assess the effectiveness of public involvement against the goals established in this plan. This assessment will ask the questions:

- ◆ Did the public know there was an opportunity to participate?
- ◆ Was the purpose of the participation clearly articulated to the public?
- ◆ Did the public have access to appropriate resources and information to allow for meaningful participation?
- ◆ Did the decision-making process allow for consideration and incorporation of public input?
- ◆ Were there complaints about the public engagement process?
- ◆ Were the public engagement efforts cost effective?
- ◆ What additional methods could have been employed to improve the process?
- ◆ Should the Public Participation Process or Language Assistance Plan be amended?

### **Training Employees**

**AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** conducts annual and new employee training on how to use LEP translation services that are available to the public and how to inform passengers of services and documents available for LEP populations. **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** also conducts training for office staff on how to use translation applications.

Employee awareness training for the ability to basically communicate with the LEP and low-literacy population.

**Area IV Agency on Aging and Community Action Programs, Inc. employees are educated on the principles of Title VI and Area IV Agency on Aging and Community Action Programs, Inc.'s Language Assistance Plan. New employees will be provided guidance on the needs of clients' services and how best to meet their needs.**

### **Translation of Vital Documents**

**AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** has translated many vital documents into Spanish and is in the process of translating others. The list of documents that are or will be translated is provided below:

- ◆ Civil Rights Complaint Form – Translated into **Spanish**

- ◆ ADA Eligibility Applications – Translated in Spanish
- ◆ ADA Service Overview Booklet – Translated into Spanish
- ◆ Service change announcements – Translated into Spanish
- ◆ On-board notices – Translated into Spanish
- ◆ Notification of free language services – New print and web-based content
- ◆ Maps and schedules, rider information, ADA service information, news and event announcements are all translated into Spanish on **AREA IV AGENCY ON AGING AND COMMUNITY ACTION PROGRAMS, INC.** 's website [www.areaivagency.org](http://www.areaivagency.org)
- ◆ Service Complaint Forms – Will be translated in Spanish

**Area IV Agency on Aging and  
Community Action Program, Inc.  
2021-2023 Title VI Plan**

Adopted on:	3-30-2022
Adopted by:	Board of Directors – Executive Committee
Revised on:	3-30-2022
This policy is hereby adopted and signed by:	Executive Committee
Name/Title:	Julia Leahy, Board President
Signature	<i>Julia S Leahy</i>