



# Title VI Plan

February 2022  
Whitley County Transit  
710 N. Opportunity Drive  
Columbia City, IN 46725

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# **I. INTRODUCTION**

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## **WHITLEY COUNTY TRANSIT'S COMMITMENT TO CIVIL RIGHTS**

This update of Whitley County Transit's (WCT) Title VI Program has been prepared to ensure that the level and quality of WCT's demand response services are provided in a nondiscriminatory manner and that the opportunity for full and fair participation is offered to WCT's riders and other community members. Additionally, through this program, WCT 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 WCT 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 WCT'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), WCT 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 WCT'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 WCT riders aware of its commitment to Title VI compliance, and their right to file a civil rights complaint, WCT has presented the following information on its printed ride guide and website.

### **Your Civil Rights**

Whitley County Transit (WCT) 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 WCT. For more information on WCT's civil rights program and the procedures to file a complaint, please contact 260-248-8944, Ext. 1; email [bernie@wcco.com](mailto:bernie@wcco.com) or visit our administrative office at 710 N. Opportunity Drive, Columbia City, IN 46725 from 8:00 am – 4:00 pm Monday – Friday. 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 WCT programs and services, visit <https://whitleycountycouncilonaging.org/whitley-county-transit>. If information is needed in another language, please contact 260-248-8944 Ext. 1.

### **Discrimination Complaint Procedures**

WCT 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 WCT 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 <https://whitleycountycouncilonaging.org/whitley-county-transit>.

WCT will notify INDOT of all formal complaints within five business days of receiving the complaint.

**\*\*See Addendum A for WCT's Title VI Complaint form\*\***

### **The Procedure**

If you believe that you have received discriminatory treatment by the WCT on the basis of race, color, or national origin you have the right to file a complaint with the WCT Transit Manager, Bernie King.

Methods of filing a complaint:

Complete the Complaint Form, and send it to:

Bernie King  
710 N. Opportunity Drive  
Columbia City, IN 46725

Verbal complaints are accepted and transcribed by Bernie King. To make a verbal complaint, call 260-248-8944, Ext. 1 and ask for Bernie King.

WCT investigates complaints received no more than 180 days after the alleged incident. WCT will process complaints that are complete. Once the complaint is received, WCT will review it and the complainant will receive an acknowledgement letter informing them whether the complaint will be investigated by WCT.

WCT has up to fifteen days to investigate the complaint. If more information is needed to resolve the case, the WCT may contact the complainant. The complainant has ten days from the date of the letter to send requested information to the investigator assigned to the case.

If WCT's investigator is not contacted by the complainant or does not receive the additional information within ten days, WCT 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 fifteen 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**

WCT maintains a list of active investigations conducted by FTA and entities other than FTA, including lawsuits and complaints naming WCT 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 WCT 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. WCT’S PUBLIC PARTICIPATION PLAN

**Key Principles**

WCT’s Public Participation Plan (PPP) has been prepared to ensure that no one is precluded from participating in WCT’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 WCT’s decision making;
- The concerns of all participants involved will be considered in the decision-making process; and,
- WCT will seek out and facilitate the involvement of those potentially affected.

Through an open public process, WCT has developed a public participation plan to encourage and guide public involvement efforts and enhance access to WCT’s transportation decision-making process by minority and Limited English Proficient (LEP) populations. The public participation plan describes the overall goals, guiding principles and outreach methods that WCT uses to reach its riders.

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.

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

The overarching goals of WCT’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 - WCT 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 - WCT develops and maintains partnerships with communities through the methods described in its public participation plan.
- Quality Input and Participation - That comments received by WCT are useful, relevant and constructive, contributing to better plans, projects, strategies and decisions.

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

WCT'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 - WCT will proactively reach out to and engage low income, minority and LEP populations from the WCT 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 – WCT will respond and incorporate appropriate public comments into transportation decisions.
- Accessibility – Feedback will be solicited 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.

WCT 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;
- 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;
- For minor schedule and service changes not rising to the level of those above, WCT will post service change notices on appropriate buses and stops sixty days in advance of the change date.

## **IV. WCT'S PUBLIC PARTICIPATION PROCESS**

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

WCT's PPP includes many new mediums extending beyond the traditional approach which relied on legal notices and intermittent media coverage. While WCT maintains these elements to its outreach program along with traditional seat-drop flyers, WCT 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. An internal review by the appropriate committee is conducted. WCT's Board of Directors Transit Committee will review all service change proposals;
3. Proposals are reviewed by WCT's Board of Directors Transit Committee;
4. A Title VI review of the proposal is conducted;
5. If required, authorization from the WCT Board of Directors is sought to proceed to a public comment period;
6. Public outreach venues, dates and times are determined with consideration of the proposed changes and their impact on specific locations/populations within the WCT service area;
7. Public outreach materials and a program are developed;
8. Outreach in advance of public information sessions is released (using mediums listed below);
  1. An Email is transmitted to WCT community partners;
  2. Local newspapers;
  3. Discussion at community events;
  4. Solicit feedback via our monthly newsletter and website;
  5. The public comment period ends;
  6. A WCT Board of Directors reviews a summary package detailing the outcome of the public participation process along with recommendations from Transit Manager;
  7. The final service/fare change date is set;
  8. Outreach is conducted in advance of any service or fare change;

## **Selection of Meeting Locations**

When determining locations and schedules for public meetings, WCT 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;
- Consider newspaper ads as well as podcasts that serve LEP populations;
- 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.

## **WCT Mediums**

- Print – Newspapers and other periodicals
- Outdoor – Advertising on-board buses (interior)
- Website – WCT has assembled a comprehensive website with automatic alerts
- Social Media – WCT has used Facebook (110 followers) since 2018 to help engage community
- On-board Flyers – WCT regularly uses flyers to provide riders with details of service changes and schedules of public meetings and hearings.
- Direct Mail to Community Partners
- 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 riders or members of the community can comment on proposed service or fare changes (mail, email, social media, public hearings and others), all comments are assembled into a single document for presentation to the WCT 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, WCT has assembled a listing of stakeholders with whom we regularly communicate through email and direct mail. A complete list of WCT’s community stakeholders can be obtained by contacting WCT.

**Stakeholder List**

Any community organization or person can be added to the WCT stakeholder list and receive regular communications regarding service changes by contacting the WCT administrative office at 260-248-8944. Local organizations and businesses can also request that a speaker from WCT attend their regular meeting at the same number or through the WCT website <https://whitleycountycouncilonaging.org>.

**V. DECISION MAKING BODIES**

**Non-Elected Committees and Councils**

At WCT, decisions regarding policy, service changes, fares, capital programming and facility locations are made by a WCCOA Corporation-elected WCT Board of Directors. WCT’s Board of Directors is composed of 14 members representing various communities and townships in the WCT service area. WCT also has an internal group known as the Transportation Committee. The Transportation Committee holds ongoing meetings to help to guide decisions regarding routes, schedules, and other topics important to the community and our riders. Meetings of the WCT Board of Directors and the Transportation Committee are always open to the public, held at WCCOA, 700 N. Opportunity Drive, Columbia City, IN 46725. Notices of upcoming meetings are posted on our website and is emailed to our regional partners.

**Transportation Committee**

This committee is open to the public and comprised of representatives residing in our service area. During meetings, which are held as needed, members discuss all aspects of WCT’s services from the perspective of the public. This group offers an invaluable service to WCT. Membership is voluntary and open-ended. Members volunteer to serve, are not appointed and they may serve for as long as they desire therefore membership changes from time to time. This group has been meeting for over 4 years. Presently there are 3 members.

<b>WCT</b>	<b>Caucasian</b>	<b>African American</b>	<b>Hispanic</b>	<b>Asian</b>
<b>Board of Directors</b>	14			
<b>Transportation Committee</b>	3			

## **VI. SUMMARY OF CHANGES**

### **Service Change Evaluations Since 2018**

Since WCT's 2008 Title VI Plan Submission there have been one change in WCT's fare structure. There have been zero service changes.

These changes, the associated outreach and Title VI determination and WCT Board Approval are available by contacting WCT.

### **Program Specific Requirements**

#### **Title VI Monitoring**

The results of the ongoing monitoring of service standards as defined in the WCT's 2016 program can be obtained by contacting WCT.

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

WCT constructed a garage in 2013. The garage, including an enclosed wash bay, is used to house and clean WCT vehicles. Additionally, the facility can be used to host WCT staff meetings and trainings as needed.

#### **Demographic Service Profile**

Because WCT 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**

At the time this Policy was drafted, our Section 5311 funding application for calendar year 2022 has been approved.

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

A civic rights compliance review was conducted as a part of a larger INDOT compliance review in 2020.

### **Recent Annual Certifications and Assurances**

WCT executed its most recent Certifications and Assurances to the FTA in our Section 5311 funding application for calendar year 2022.

### **Contact**

For additional information on the WCT 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:

Bernie King  
260-248-8944, Ext. 1  
bernie@wccoa.biz

## VIII. LANGUAGE ASSISTANCE PLAN

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

In order to ensure meaningful access to programs and activities, WCT uses the information obtained in a Four Factor Analysis to determine the specific language services that are appropriate. This analysis helps WCT 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 WCT;
2. The frequency with which LEP persons come into contact with WCT services and programs;
3. The nature and importance of WCT's services and programs in people's lives; and
4. The resources available to WCT 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 WCT'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, WCT 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 2019. Data was reviewed by WCT's staff leadership.

#### **Service Area Overview**

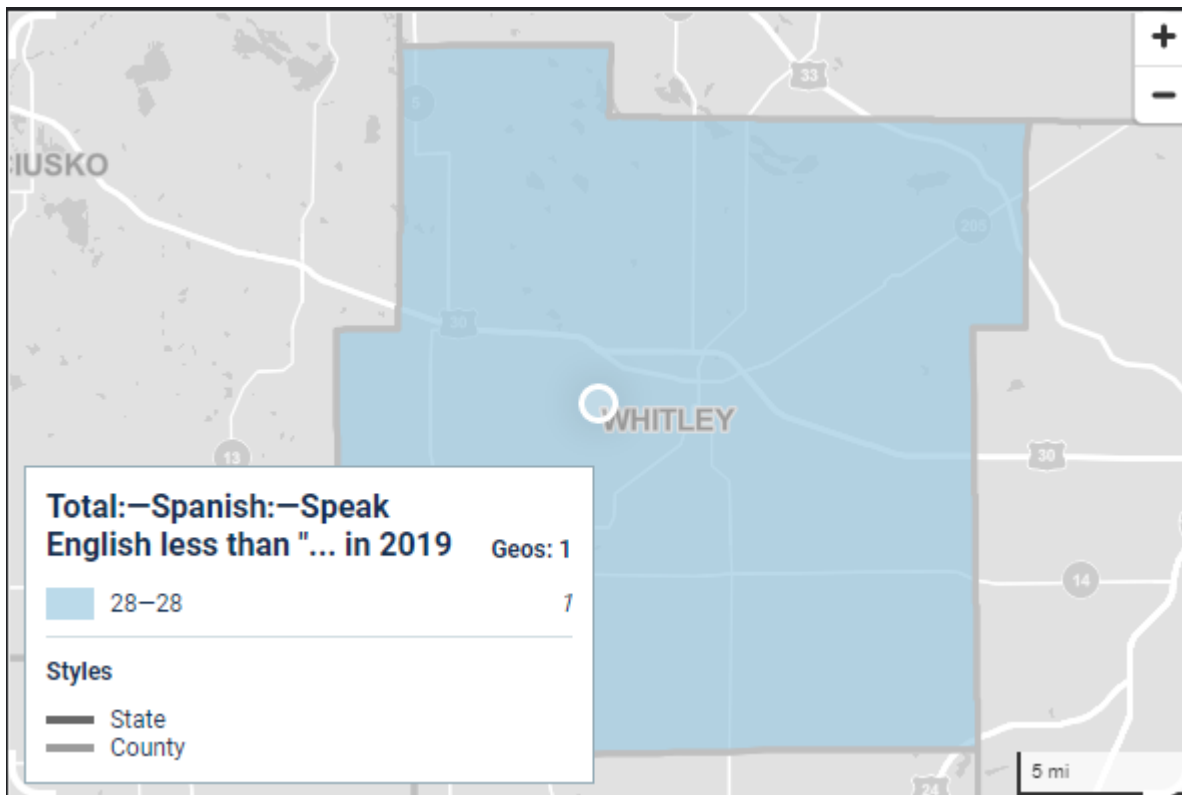
WCT's service area encompasses approximately 336 square miles of Whitley County and is home to a population speaking more than two different languages. Of the total service area population, 34191, 3.9% of residents report speaking a language other than English in their homes. All groups represented in this category are shown below.

<b>Speak a Language Other than English in the Home</b>	<b>Population in the Language Group</b>	<b>Percent of Total Population</b>
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Spanish	28	0.08%
German or other West Germanic Languages	26	0.08%
French, Haitian, or Cajun	14	0.04%
Korean	8	0.03%
Other Indo-European Languages	4	0.01%

**The Locations of the LEP Community**

Addendum B offers data from the United States Census Bureau illustrating the breakdown of language spoken in the home by Whitley County residents.



**Factor 2 – Frequency of LEP Use**

There are many places where WCT riders and members of the LEP population can come into contact with WCT services including the use of demand response buses, calls to customer service representatives, reservation agents and WCT’s outreach materials. An important part of the development of WCT’s Language Access Plan is the assessment of major points of contact, including:

- Communication with WCT’s customer service staff;
- Bus pass sales;
- Printed outreach materials;
- Web-based outreach materials;

- Public meetings;
- Demand response reservation agents;
- Local news media (print);

WCT distributed a language survey to its employees. The objective of the survey was to evaluate the needs of ABC customers who are not able to communicate in English. The first question asked, In what way(s) do you interact with WCT riders? The chart below illustrates the results.

<b>Method of Interaction</b>	<b>Percent of Responses</b>
Telephone	62.5%
Face to Face	75%
Email	25%

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	50%
Never	50%

Next, the survey asked employees to identify what languages other than English they have encountered when communicating with passengers.

<b>Language</b>	<b>Percent of Responses</b>
Spanish	50%
Chinese	12.5%
No languages other than English	37.5%

The survey asked, overall, how effective employees are in communicating with Limited English Proficient WCT passengers. The results are summarized below.

<b>Effectiveness</b>	<b>Percent of Total Responses</b>
Very Effective	0%
Moderately Effective	62.5%
Less Effective	0%
Unable to Communicate	0%
Unsure	37.5%

### **Community Partners**

WCT also canvassed 14 community partners to assess the extent to which they came into contact with LEP populations. Community partners were asked the following questions:

The first question asked, Do you encounter non-English speaking/reading people who you're your services? The chart below illustrates the results.

<b>Responses</b>	<b>Percent of Responses</b>
Yes	57.1%
No	42.9%

Next the survey asked, If so, what languages have you encountered? The results are summarized below.

<b>Responses</b>	<b>Percent of Responses</b>
Spanish	28.8%
Farci	7.1%
Portuguese	7.1%
Ukrainian	7.1%
None	49.9%

Next the survey asked, Do you find language to be a barrier in preventing you from providing services? The chart below illustrates the results.

<b>Responses</b>	<b>Percent of Responses</b>
Yes	14.3%
No	85.7%

### **Consulting Directly with the LEP Population**

In addition to the U.S. Census data, employee survey, and outreach to community partners, WCT implemented a survey of its riders. Here is the information gathered from questions pertaining to serving LEP passengers:

The survey asked, In which country were you born? The chart below illustrates the results.

<b>Responses</b>	<b>Percent of Responses</b>
United States	92.6%
India	3.7%
Mexico	3.7%

The survey also asked, How well do you speak and understand English? The chart below illustrates the results.

<b>Responses</b>	<b>Percent of Responses</b>
Very Well	51.9%
Moderately Well	48.1%



### **Factor 3 – The Importance of WCT Service to People’s Lives**

Access to the services provided by WCT are critical to the lives of many in the service area. Many depend on WCT’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 American’s 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.

Here are the survey results when passengers were asked, What is your main purpose in using WCT?

<b>Responses</b>	<b>Percent of Responses</b>
Medical Appointments	55.6%
Work	22.2%
School	7.4%
Other	14.8%

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 WCT 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 WCT vehicles.**

The WCT 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 WCT.

Any person who wants additional information on WCT’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 WCT within 180 days of the date of the alleged discrimination.

To file a complaint contact WCT at 260-248-8944, Ext. 1, <https://whitleycountycouncilonaging.org/whitley-county-transit> or send a letter to 710 N.

Opportunity Drive, Columbia City, IN 46725. 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 WCT 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 WCT dentro de los 180 días siguientes a la fecha de la supuesta discriminación.

Para presentar una queja al WCT, llame al 260-248-8944, Ext. 1, <https://whitleycountycouncilonaging.org/whitley-county-transit>, o escribe una calta y envía a 710 N. Opportunity Drive, Columbia City, IN 46725. 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**

WCT has committed resources to improving access to its services and programs for LEP persons. Today, bilingual information (English/Spanish) is distributed in an extensive number of mediums including the following:

- ◆ A bi-lingual English/Language(s) website
- ◆ A complete bilingual English/Language(s) Rider’s Guide to demand response services (ADA paratransit)
- ◆ Bilingual English/Language(s) outreach materials (service change alerts)
- ◆ Bilingual English/Language(s) representation at public meetings
- ◆ Bilingual English/Language(s) Demand Response reservation agents
- ◆ Bilingual English/Language(s) on-board signage

To date, the costs associated with these efforts fit within the WCT’s marketing and outreach budget. Costs are predominantly associated with translation services and material production.

#### **Outcomes**

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

WCT has determined that these additional services would assist other LEP populations regardless of the total population in the region:

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.

WCT 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; and
- ◆ Post Event Assessments (PEA)

### **Post-Event Assessments**

Following service changes, fare increases and planning projects, the Executive Director assesses 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**

During the orientation process, WCT conducts new employee training that informs drivers and dispatchers on how to inform passengers of the services and documents that are available for LEP populations. This orientation includes a video explaining how to use Google translation services when encountering an LEP passenger. Additionally, WCT conducts quarterly staff meetings during which drivers and dispatchers are reminded of procedures.

### **Translation of Vital Documents**

WCT has translated the following important documents into Spanish:

- ◆ Title VI Civil Rights Complaint Form – in 2020
- ◆ Rider Guide – in 2020

**ADDENDUM A**

**WHITLEY COUNTY TRANSIT  
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):

Race       Color       National Origin       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.

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**Section IV:**

Have you previously filed a Discrimination Complaint with this agency?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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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:**

**Whitley County Transit**  
**Bernie King, Transit Manager**  
**710 N. Opportunity Drive, Columbia City, IN 46725**  
 260-248-8944  
**bernie@wcco.biz**

A copy of this form can be found online at **<https://whitleycountycouncilonaging.org/whitley-county-transit>**

# ADDENDUM B

## United States Census Bureau Data – Whitley County Residents Who Speak a Language Other than English in the Home

