



# Title VI Plan

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**Approved By:** LTR Board of Directors

**Amended On:** N/A

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# **I. INTRODUCTION**

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## **CATCH-A-RIDE'S COMMITMENT TO CIVIL RIGHTS**

This update of Catch-A-Ride's Title VI Plan has been prepared to ensure that the level and quality of Catch-A-Ride's demand response services are provided in a nondiscriminatory manner and that the opportunity for full and fair participation is offered to Catch-A-Ride's riders and other community members. Additionally, through this plan, Catch-A-Ride 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 Catch-A-Ride 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 Catch-A-Ride's services on the basis of race, color, or national origin, the contents of this plan 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), Catch-A-Ride has an obligation to ensure that:

- ◆ The benefits of its transportation services are shared equitably throughout the service area;
- ◆ The level and quality of transportation services are sufficient to provide equal access to all riders in its service area;
- ◆ No one is precluded from participating in Catch-A-Ride'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 plan is in place for correcting any discrimination, whether intentional or unintentional.

## **II. GENERAL REQUIREMENTS**

### **Notice to the Public**

To make Catch-A-Ride riders aware of its commitment to Title VI compliance, and their right to file a civil rights complaint, Catch-A-Ride has presented the following information on its website, which has Google Translate available to translate into many other languages, including Spanish. It is also posted in the Aging and Disability Resource Center (ADRC) Library (the only area within LifeTime's building generally accessed by the public) and dispatch office and is included in the brochure.

## **Your Civil Rights**

Catch-A-Ride 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 VI may file a complaint with Catch-A-Ride. For more information on Catch-A-Ride's civil rights program and the procedures to file a complaint, please contact Michelle Guidice, Catch-A-Ride Director, at 800-330-7603; email [mguidice@lifetime-resources.org](mailto:mguidice@lifetime-resources.org) or visit our administrative office at 13091 Benedict Drive, Dillsboro, IN 47018 from 8a – 4:30p, Monday through 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 Catch-A-Ride's programs and services, visit [www.lifetime-resources.org/catch-a-ride](http://www.lifetime-resources.org/catch-a-ride). If information is needed in another language, please contact 800-330-7603.

## **Discrimination Complaint Procedures**

Catch-A-Ride 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 Catch-A-Ride may file a Title VI complaint by completing and submitting the agency's Civil Rights Complaint form (Attachment A), available at our administrative offices or on our website [www.lifetime-resources.org/catch-a-ride](http://www.lifetime-resources.org/catch-a-ride).

Catch-A-Ride will notify INDOT of all formal complaints within five business days of receiving the complaint.

## **The Procedure**

If you believe that you have received discriminatory treatment by the Catch-A-Ride on the basis of race, color, or national origin you have the right to file a complaint with the Catch-A-Ride Director.

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

Complete the Civil Rights Complaint form, and send it to:

Michelle Guidice, Catch-A-Ride Director, LifeTime Resources, 13091 Benedict Drive, Dillsboro, IN 47018.

Verbal complaints are accepted and transcribed by the Catch-A-Ride Director. To make a verbal complaint, call 800-330-7603 and ask for Michelle Guidice.

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

Catch-A-Ride has up to thirty days to investigate the complaint. If more information is needed to resolve the case, Catch-A-Ride 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 Catch-A-Ride’s investigator is not contacted by the complainant or does not receive the additional Information within thirty days, Catch-A-Ride can administratively close the case. A case can also be administratively closed 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**

Catch-A-Ride maintains a list of active investigations conducted by FTA and entities other than FTA, including lawsuits and complaints naming LifeTime Resources dba Catch-A-Ride that allege discrimination on the basis of race, color, or national origin. The Investigation, Lawsuit & Complaint Tracking 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 Catch-A-Ride in response, or final findings related to the investigation, lawsuit, or complaint.

As of the writing of this plan, 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
N/A				

### **III. CATCH-A-RIDE'S PUBLIC PARTICIPATION PLAN**

#### **Key Principles**

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

Through an open public process, Catch-A-Ride has developed a public participation plan to encourage and guide public involvement efforts and enhance access to Catch-A-Ride'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 Catch-A-Ride 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 Catch-A-Ride'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 - Catch-A-Ride 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 - Catch-A-Ride develops and maintains partnerships with communities through the methods described in its public participation plan.

- Quality Input and Participation - Comments received by Catch-A-Ride are to be useful, relevant, and constructive, contributing to better plans, projects, strategies, and decisions.

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

Catch-A-Ride'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 - Catch-A-Ride will proactively reach out to and engage low income, minority and LEP populations from the Catch-A-Ride 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 – Catch-A-Ride 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.

Catch-A-Ride 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, Catch-A-Ride will post service change notices on appropriate vehicles sixty days in advance of the change date.



## **IV. CATCH-A-RIDE'S PUBLIC PARTICIPATION PROCESS**

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

Catch-A-Ride's PPP includes many new mediums extending beyond the traditional approach which relied on legal notices and intermittent media coverage. While Catch-A-Ride maintains these elements to its outreach plan along with traditional seat-drop flyers, Catch-A-Ride 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 committees is conducted (for example, Catch-A-Ride's Service Review Committee, detailed later in this plan, will review all service change proposals);
3. Proposals are reviewed by Catch-A-Ride's Transportation Advisory Committee (TAC);
4. A Title VI review of the proposal is conducted;
5. If required, authorization from the LifeTime Resources' 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 Catch-A-Ride service area;
7. Bilingual (English and Spanish) public outreach materials are developed;
8. Outreach in advance of public information sessions is released (using toolbox of mediums listed below);
  - a. An Email or letter is sent to Catch-A-Ride community partners;
  - b. A public notice is placed in the newspaper
  - c. A post is generated on Facebook
9. The public comment period ends;
10. LifeTime's Board of Directors is provided with a summary detailing the outcome of the public participation process, along with staff recommendations and a vote is taken;
11. The final service/fare change date is set;
12. Outreach is conducted in advance of any service or fare change;
13. Bilingual system timetable and website updated in advance of the proposed change.

### **Selection of Meeting Locations**

When determining locations and schedules for public meetings, Catch-A-Ride 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 and an option to join virtually or via a conference call;
- 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.

### **Catch-A-Ride Mediums**

- Print – Newspapers and other periodicals
- Outdoor – Advertising on-board buses (interior)
- Website – Catch-A-Ride has assembled a comprehensive website ([www.lifetime-resources.org/catch-a-ride](http://www.lifetime-resources.org/catch-a-ride))
- Web-Based Feedback Social Media – Catch-A-Ride has used Facebook (495 Likes & 530 Followers) since 2018 to help engage the community
- Radio (if available and appropriate)
- Seat Drops, On-board Flyers
- 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 riders or members of the community can comment (mail, email, social media, public meetings and/or others) on proposed service or fare changes, for example, all comments are assembled into a single document for presentation to the Catch-A-Ride 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, Catch-A-Ride has assembled a listing of stakeholders with whom we regularly communicate through email and direct mail. A complete list of Catch-A-Ride's community stakeholders can be obtained by contacting Catch-A-Ride.

### ***Stakeholder List***

Any community organization or person can be added to the Catch-A-Ride stakeholder list and receive regular communications regarding service changes by contacting the Catch-A-Ride administrative office at 800-330-7603. Local organizations and businesses can also request that a speaker from Catch-A-Ride attend their regular meeting at the same number.

## **V. DECISION MAKING BODIES**

### **Non-Elected Committees and Councils**

At Catch-A-Ride, decisions regarding policy, service changes, fares, capital programming and facility locations are made by a Board of Directors. *LifeTime's* Board of Directors is composed of 15 members representing the counties served by *LifeTime* Resources. Catch-A-Ride also has an internal group known as the Service Review Committee and an external group known as the Transportation Advisory Committee (TAC). The Transportation Advisory Committee (TAC) holds ongoing meetings to help to guide decisions regarding routes, schedules, and other topics important to the community and our riders. Meetings of Transportation Advisory Committee are always open to the public and held at an accessible location. Meeting notices are emailed to members and listed on Catch-A-Ride's website.

### **Service Review Committee**

This employee-based internal committee is comprised of the Executive Director, Director of Operations, Catch-A-Ride Director, and Catch-A-Ride Field Supervisors. It meets, as needed, to discuss possible service modifications from the perspective of Operators. Membership is voluntary and open-ended (i.e. members are not appointed and they may serve for as long as they desire) and changes from time to time.

### **Transportation Advisory Committee (TAC)**

This committee is open to the public and comprised of passengers representing various bus routes and representatives of local organizations. At the quarterly meetings, members discuss all aspects of Catch-A-Ride's services from the perspective of the public. This group offers an invaluable service to Catch-A-Ride. Membership is voluntary and open-ended (i.e. members are not appointed and they may serve for as long as they desire) and it changes from time to time. This group has been meeting for over 10 years.

<b>Body</b>	<b>Caucasian</b>	<b>African American</b>	<b>Hispanic</b>	<b>Asian</b>
<b>Board of Directors</b>	83%	17%	0%	0%
<b>Transportation Advisory Committee</b>	Varies			
<b>Service Review Committee</b>	100%	0%	0%	0%

## **VII. SUMMARY OF CHANGES**

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

Since Catch-A-Ride’s 2018 Title VI Plan Submission there have been no changes in Catch-A-Ride’s fare structure. There have been two service changes; discontinuation of the point deviation route in Madison, IN and an increase in the minimum age (from 13 to 16) to ride without an escort.

These changes, the associated outreach and LifeTime Resources’ Board Approval are available by contacting Catch-A-Ride.

### **Program Specific Requirements**

#### **Title VI Monitoring** (from 2018 Title VI Plan)

The results of the ongoing monitoring of service standards as defined in Catch-A-Ride’s 2018 plan can be obtained by contacting Catch-A-Ride.

#### **Subrecipient Compliance**

Historic Hoosier Hills RC&D is the direct recipient of Section 5311 funds, which are passed through to LifeTime Resources, Inc. dba Catch-A-Ride. Historic Hoosier Hills provides oversight of the program to ensure compliance.

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

**N/A**

#### **Demographic Service Profile**

Because Catch-A-Ride operates fewer than 50 buses in peak service, a demographic service profile was not prepared for this plan update.

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

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

N/A

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

Catch-A-Ride has not been the subject of any such reviews since its 2018 plan submission.

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

Catch-A-Ride executed its most recent Certifications and Assurances to the FTA in May of 2020 and is in the process of executing 2022 certifications and assurances.

### **Contact**

For additional information on the Catch-A-Ride 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:

Michelle Guidice, Catch-A-Ride Director, at 800-330-7603

## **IX. LANGUAGE ASSISTANCE PLAN**

### **IMPROVING ACCESS FOR PEOPLE WITH LIMITED ENGLISH PROFICIENCY (LEP)**

In order to ensure meaningful access to programs and activities, Catch-A-Ride uses the information obtained in a Four Factor Analysis to determine the specific language services that are appropriate. This analysis helps Catch-A-Ride 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 Catch-A-Ride;
2. The frequency with which LEP persons come into contact with Catch-A-Ride's services and programs;
3. The nature and importance of Catch-A-Ride's services and programs in people's lives; and
4. The resources available to Catch-A-Ride 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 Catch-A-Ride'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, Catch-A-Ride 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 (2015-2019). Data was reviewed by Catch-A-Ride’s Service Review Committee in its entirety.

**Service Area Overview**

Catch-A-Ride’s service area encompasses approximately 1,791 square miles of Dearborn, Ohio, Ripley, Switzerland, Jefferson, and Decatur Counties and is home to a population speaking more than 4 different languages. Of the total service area population, 153,192, a maximum of 1.1% of residents report speaking English less than very well in any given county served.

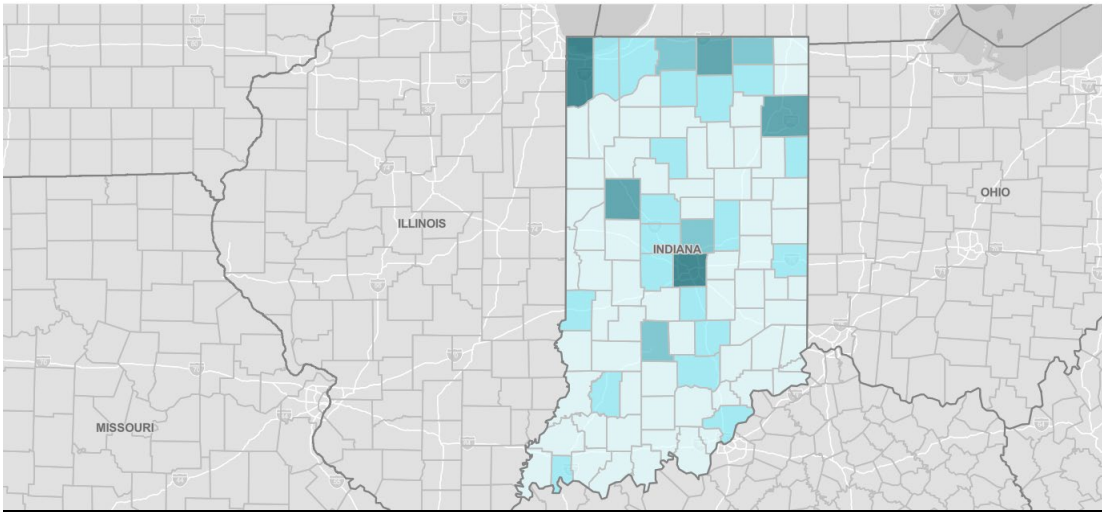
Label	Dearborn County, Indiana		Decatur County, Indiana		Jefferson County, Indiana		Ohio County, Indiana		Ripley County, Indiana		Switzerland County, Indiana	
	Estimate	Percent	Estimate	Percent	Estimate	Percent	Estimate	Percent	Estimate	Percent	Estimate	Percent
PLACE OF BIRTH												
Total population	49,479	49,479	26,562	26,562	32,201	32,201	5,874	5,874	28,391	28,391	10,685	10,685
LANGUAGE SPOKEN AT HOME												
Population 5 years and over	46,929	46,929	24,834	24,834	30,176	30,176	5,573	5,573	26,744	26,744	10,035	10,035
English only	46,011	98.0%	23,935	96.4%	29,566	98.0%	5,482	98.4%	25,927	96.9%	9,591	95.6%
Language other than English	918	2.0%	899	3.6%	610	2.0%	91	1.6%	817	3.1%	444	4.4%
Speak English less than "very well"	300	0.6%	199	0.8%	248	0.8%	6	0.1%	292	1.1%	110	1.1%
Spanish	463	1.0%	306	1.2%	326	1.1%	79	1.4%	460	1.7%	80	0.8%
Speak English less than "very well"	139	0.3%	153	0.6%	113	0.4%	6	0.1%	136	0.5%	20	0.2%
Other Indo-European languages	248	0.5%	347	1.4%	108	0.4%	0	0.0%	296	1.1%	236	2.4%
Speak English less than "very well"	13	0.0%	19	0.1%	36	0.1%	0	0.0%	127	0.5%	90	0.9%
Asian and Pacific Islander languages	161	0.3%	204	0.8%	154	0.5%	7	0.1%	56	0.2%	56	0.6%
Speak English less than "very well"	125	0.3%	27	0.1%	99	0.3%	0	0.0%	29	0.1%	0	0.0%
Other languages	46	0.1%	42	0.2%	22	0.1%	5	0.1%	5	0.0%	72	0.7%
Speak English less than "very well"	23	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%

**The Locations of the LEP Community**

The map in Exhibit A illustrates the distribution of population densities by Census Tract where individuals speak English “Less than Very Well.”

**Exhibit A**

Select Clear Geos Basemap Table Notes



**Legend**

	14,400–55,513	2
	8,751–14,399	3
	3,028–8,750	4
	1,101–3,027	19
	6–1,100	64
	No Data	0

**Factor 2** – Frequency of LEP Use

There are many places where Catch-A-Ride riders and members of the LEP population can come into contact with Catch-A-Ride’s services including the use of demand response buses, calls to customer service representatives, and Catch-A-Ride’s outreach materials. An important part of the development of Catch-A-Ride’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 Catch-A-Ride’s customer service staff;
- Printed outreach materials;
- Web-based outreach materials;
- Public meetings;
- Demand response reservation agents; and
- Local news media (print and radio);

Catch-A-Ride distributed a language survey to its employees. The objective of the survey was to evaluate the needs of Catch-A-Ride customers who are not able to communicate in English. The first question asked, In What Way(s) Do You Interact with Catch-A-Ride riders? The chart below illustrates the results of the 39 surveys received.

<b>Method of Interaction</b>	<b>Percent of Responses</b>
Telephone	44%
Face to Face	79%
Email	10%
Fax	5%

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	8%
Rarely	46%
Never	46%

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

<b>English</b>	<b>Percent of Interactions</b>
Often	92%
Sometimes	0%
Rarely	0%
Never	3%
No Answer	5%

<b>Spanish</b>	<b>Percent of Interactions</b>
Often	0%
Sometimes	8%
Rarely	38%
Never	51%
No Answer	3%

<b>Chinese</b>	<b>Percent of Interactions</b>
Often	3%
Sometimes	0%
Rarely	10%
Never	77%
No Answer	10%



<b>Other (Hearing Impaired/Unknown)</b>	<b>Percent of Interactions</b>
Often	0%
Sometimes	3%
Rarely	5%
Never	72%
No Answer	20%

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

<b>Effectiveness</b>	<b>Percent of Total Responses</b>
Very Effective	49%
Moderately Effective	23%
Less Effective	21%
Unable to Communicate	7%

### **Community Partners**

Catch-A-Ride also canvassed its community partners to assess the extent to which they came into contact with LEP populations. Community partners were asked the following questions:

1. Do you encounter non-English speaking/reading people who need your services?
2. If so, what are the top three languages that you encounter?
3. How do you address language barriers?
4. Do you find language to be a barrier in preventing you from providing service?

<b><u>Question</u></b>	<b><u>DSI</u></b>	<b><u>UWGC SE IN</u></b>	<b><u>Batesville Public Library</u></b>	<b><u>Jefferson Co UW</u></b>
Do you encounter non-English speaking/reading people who need your services?	No	No	Yes	Yes
If so, what are the top three languages that you encounter?	Spanish Portuguese	N/A	Spanish Chinese Tagalong	Spanish
How do you address language barriers?	Interpreter	I do not for folks with foreign languages but was thinking you could utilize a translation software that can be used with a phone or ipad?	Just do the best we can	Interpreter
Do you find language	No	No	No	No

to be a barrier in preventing you from providing service?				
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**Consulting Directly with the LEP Population**

In addition to the U.S. Census data, employee survey, and outreach to community partners, Catch-A-Ride implemented a survey of its riders. Results of the survey are below:

<b>What is your preferred Language?</b>	<b>Percent of Responses</b>
English	80%
Spanish	20%

<b>Do you find language to be a barrier that prevents you from using Catch-A-Ride?</b>	<b>Percent of Responses</b>
Yes	0%
No	100%

<b>If Yes, how do you address language barriers?</b>
N/A – No “Yes” responses to the question above

<b>What suggestions do you have for how Catch-A-Ride can make improvements regarding language barriers?</b>
N/A – No responses related to language barrier improvements

**Factor 3** – The Importance of Catch-A-Ride Service to People’s Lives

Access to the services provided by Catch-A-Ride is critical to the lives of many in the service area. Many depend on Catch-A-Ride’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. Catch-A-Ride’s 2018 – 2020 Trip Purposes are detailed in the table below:

<b>2018 - 2020 Trip Purposes</b>	
<b>Trip Purpose</b>	<b>Total Pass Boardings</b>
COVID Meal	20
Dialysis	16023
Dining	2731
Education	2705
Employment	47078
Health/Beauty	2951
Medical Non-Dialysis	37886

Other	136
Personal Business	14579
Recreation/Social	5940
Sheltered Workshop	41054
Shopping	25757
SNAC	8164
Walk-On	198
<b>Grand Total</b>	<b>205222</b>

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 Catch-A-Ride 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 Catch-A-Ride vehicles.**

Catch-A-Ride 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 Catch-A-Ride.

Any person who wants additional information on Catch-A-Ride’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 Catch-A-Ride within 180 days of the date of the alleged discrimination.

To file a complaint contact Michelle Guidice, Catch-A-Ride Director, at 800-742-5001, visit [www.lifetime-resources.org/catch-a-ride](http://www.lifetime-resources.org/catch-a-ride) or send a letter to Catch-A-Ride at 13091 Benedict Drive, Dillsboro, IN 47018. 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 Catch-A-Ride 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 Catch-A-Ride dentro de los 180 días siguientes a la fecha de la supuesta discriminación.

Para presentar una queja al Catch-A-Ride, llame al Michelle Guidice, Directora de Catch-A-Ride 800-330-7603, [www.lifetime-resources.org/catch-a-ride](http://www.lifetime-resources.org/catch-a-ride), o escribe una carta y envía a Catch-A-Ride 13091 Benedict Drive, Dillsboro, IN 47018. 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

Catch-A-Ride has committed resources to improving access to its services and programs for LEP persons. Today, bilingual information in English/Spanish is available in a number of mediums including the following:

- ◆ A bi-lingual English/Spanish website (via use of Google Translate)
- ◆ A complete bilingual English/Spanish Rider’s Guide for demand response services
- ◆ Bilingual English/Language(s) on-board signage

Catch-A-Ride also has access to interpreter and translation services, as needed, for the following:

- ◆ 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) guides and training for Catch-A-Ride drivers
- ◆ Increased use of Bilingual English/Language(s) Facebook posts (not yet 100%)
- ◆ Translation of additional documents or any of the above in another language

To date, the costs associated with these efforts fit within the Catch-A-Ride’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”, Catch-A-Ride 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 Catch-A-Ride website;
2. Adding translation services for telephone communications with customer service representatives;
3. Assigning new staff charged with improvement of community engagement; and
4. Creating a page with multiple languages for print and web-based posting indicating how Catch-A-Ride provides language assistance.

5. Use of a smart phone/tablet with translation application.

The above items are in process and will be launched on November 1, 2021.

Additional recommendations gleaned from the internal staff survey include:

1. Encourage employees to take Spanish classes. Offer reward, bonus, or pay increase. Catch-A-Ride 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 plan every three years;
- ◆ Ongoing collaboration with regional partners;
- ◆ Ongoing review of interpreter/translation requests; and
- ◆ Post Event Assessments (PEA)

## **Post-Event Assessments**

Following service changes, fare increases and planning projects, the Catch-A-Ride 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**

Catch-A-Ride 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. Catch-A-Ride 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.

### **Translation of Vital Documents**

While there is no requirement to translate vital documents if the number of persons that do not speak English well is less than 1000 and also less than 5% of the population, Catch-A-Ride 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 November 2021
- ◆ Catch-A-Ride Brochure – Translated into Spanish October 2021
- ◆ Service change announcements – To be developed, as changes occur
- ◆ On-board notices – Translated into Spanish since 2018
- ◆ Notification of free language services – New print and web-based content translated into Spanish November 2021
- ◆ Maps and schedules, rider information, ADA service information, news and event announcements are all translated into Spanish on Catch-A-Ride’s website ([www.lifetime-resources.org/catch-A-Ride](http://www.lifetime-resources.org/catch-A-Ride)) – Google Translate added September 2021
- ◆ Service Complaint Forms – Translated into Spanish November 2021

**Documents Impacted by this Plan:** Civil Rights Complaint form, Investigation, Lawsuit & Complaint Tracking form, Driver’s Manual, website, CAR Brochure, Vehicle Posting,

# ATTACHMENT A – CIVIL RIGHTS COMPLAINT FORM

## Catch-A-Ride

### Civil Rights Complaint Form

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**Catch-A-Ride** is responsible for ensuring proper implementation of several civil rights laws and programs, including Title VI of the Civil Rights Act of 1964, the Americans with Disabilities Act of 1990 (ADA), the Disadvantaged Business Enterprise (DBE) program, and the External Equal Employment Opportunity (EEO) program.

In the complaint investigation process, we analyze the complainant's allegations for possible deficiencies by our transit provider. If deficiencies are identified, they are presented to the transit provider and assistance is offered to correct the inadequacies within a predetermined timeframe.

Please mail or submit your completed form to:

LifeTime Resources, Inc.

**ATTN: Michelle Guidice, Catch-A-Ride Director**

**13091 Benedict Drive**

**Dillsboro, IN 47018**

If you have questions about how to prepare a complaint, you may contact us at 800-330-7603. More information about transit-related civil rights requirements may be found on the FTA's website at [www.fta.dot.gov](http://www.fta.dot.gov).

**Note:** Apart from the form, *on separate pages*, please describe your complaint. You should include specific details such as names, dates, times, route numbers, witnesses, and any other information that would assist us in our investigation of your allegations. Please also provide any other documentation that is relevant to this complaint, including any related correspondence from your transit provider.

**Important:** We cannot accept your complaint without a signature, so please sign on the last page of the form after printing out. **IF COMPLETING ELECTRONICALLY, DOUBLE CLICK EACH TEXT BOX TO ENTER TEXT.**

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#### **Section I**

**I believe that I have been (or someone else has been) discriminated against based on:**

- Race / Color / National Origin
- Disability
- Not Applicable
- Other (specify)

**I believe that a public transit provider has failed to comply with the following program requirements:**

- Disadvantaged Business Enterprise
- External Equal Employment Opportunity
- Title VI
- Americans with Disabilities Act (ADA)
- Other(specify)

**Section II**

Name:

Street Address:

City:  State:

Zip Code:

Telephone Numbers:

Home:

Cell:

E-Mail Address:

Accessible format requirements:

Large Print

Not Applicable

Other

**Section III**

Are you filing this complaint on your own behalf?

Yes  No

[If you answered "yes" to this question, go to Section IV.]



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:

Yes  No

**Section IV**

Have you previously filed a civil rights complaint with our agency?

Yes  No

If yes, what was the date?

Have you filed this complaint with any of the following agencies?

Transit Provider

Department of Transportation

Department of Justice

Equal Employment Opportunity Commission

Other

If yes, please attach a copy of any response you received to your previous complaint.

Have you filed a lawsuit regarding this complaint?

Yes  No

If yes, please provide the case number and attach any related material.

**Section V**

Name of public transit provider complaint is against:

Contact person

Title

Telephone number

**Section VI**

May we release your identity and a copy of your complaint to the transit provider?

Yes  No

**Note:** We may be unable to investigate your allegations without permission to release your identity and complaint.

Please sign here: \_\_\_\_\_

Date:

**Note:** We cannot accept your complaint without a signature.