

**(Appendix 1)**  
***Title VI Plan***  
**Section 5310/5311 grantee**

*LaGrange County Council on Aging/LCAT*

Adopted on: 07-28-15

Adopted by: LaGrange County Council on  
Aging/LCAT

\_\_\_\_\_  
07-29-2015

Revised on:

\_\_\_\_\_

*This policy is hereby adopted and signed by:*

**Section 5310/5311 grantee**

Chairperson Name/Title: Joy Sharp/Executive Board President

Chairperson Signature: \_\_\_\_\_  
Randy Packer/Executive  
Secretary/Treasurer

\_\_\_\_\_



## **Policy Statement**

The **Section 5310/5311 grantee** as a recipient of Federal Transit Administration (FTA) grant dollars either directly from FTA or through the Indiana Department of Transportation (INDOT) will comply with the Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the U.S. Department of Transportation implementing regulations.

## **Title VI Plan Elements**

The **LaGrange County Council on Aging/LaGrange County Area Transit's** Title VI plan includes the following elements:

1. *Evidence of Policy Approval*
2. *Notice to the Public*
3. *Complaint Procedure*
4. *Complaint Form*
5. *List of transit related Title VI Investigations, Complaints and Lawsuits*
6. *Public Participation Plan*
7. *Language Assistance Plan*
8. *Minority Representation Table and Description*

Note: *Additional materials will be attached, if required.*

## (Appendix 2) - TITLE VI Notice to the Public

The LaGrange County Council on Aging/LaGrange County Area Transit's Notice to the Public is as follows:

Notifying the Public of Rights Under Title VI

**LaGrange County Council on Aging/LaGrange  
County Area Transit**

The **LaGrange County Council on Aging/LaGrange County Area Transit** operates its programs and services without regard to race, color, religion, sex, sexual orientation, gender identity, or national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the **LaGrange County Council on Aging/LaGrange County Area Transit**.

For more information on the **LaGrange County Council on Aging/LaGrange County Area Transit's** civil rights program, and the procedures to file a complaint, contact 260-463-4161, (TTY 800-255-855-2880); email Executive Director Cheri Perkins your complaint to [cperkins@lagrangecoa.org](mailto:cperkins@lagrangecoa.org); or visit our administrative office at 410 E Central Av, LaGrange, IN 46761 For more information, visit [www.lagrangecountycoa.org](http://www.lagrangecountycoa.org)

A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

If information is needed in another language or alternate format contact Cheri Perkins @ 260-463-4161 ; TTY 800-255-855-2880); email [cperkins@lagrangecoa.org](mailto:cperkins@lagrangecoa.org)

The **LaGrange County** section 5310/5311 grantee's Notice to the Public is posted in the following locations: *(check all that apply)*

- Agency website [[www.lagrangecoa.org](http://www.lagrangecoa.org)]
- Public areas of the agency office (common area, public meeting rooms, etc.)
- Inside vehicles
- Rider Guides/Schedules
- Transit shelters and stations
- Other, \_\_\_\_\_

### (Appendix 3) – Title VI Complaint Procedure

The **LaGrange County Council on Aging/LaGrange County Area Transit's** Title VI Complaint Procedure is made available in the following locations: *(check all that apply)*

- X Agency website, either as a reference in the Notice to Public or in its entirety
  - X Hard copy in the central office
  - X Available in appropriate languages for LEP populations, meeting the Safe Harbor Threshold.
  - Other, \_\_\_\_\_
- 

Any person who believes she or he has been discriminated against on the basis of race, color, religion, sex, sexual orientation, gender identity, or national origin by the **LaGrange County Council on Aging/LaGrange County Area Transit** may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. The **LaGrange County Council on Aging/LaGrange County Area Transit** investigates complaints received no more than 180 days after the alleged incident. The **LaGrange County Council on Aging/LaGrange County Area Transit** will process complaints that are complete.

Once the complaint is received, the **LaGrange County Council on Aging/LaGrange County Area Transit** will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

The **LaGrange County Council on Aging/LaGrange County Area Transit** has **10** days to investigate the complaint. If more information is needed to resolve the case, the city may contact the complainant.

The complainant has **10** business days from the date of the letter to send requested information to the investigator assigned to the case.

If the investigator is not contacted by the complainant or does not receive the additional information within 61 business days, the city 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, she/he will issue one of two (2) letters 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 letter of finding (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 30 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 FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

If information is needed in another language, then contact 260-463-4161. *Si se necesita informacion en otro idioma de contacto, 260-463-4161.*

## (Appendix 4) – Title VI Complaint Form

The **LaGrange County Council on Aging/LaGrange County Area Transit's** Title VI Complaint Procedure is made available in the following locations: *(check all that apply)*

- Agency website, either as a reference in the Notice to Public or in its entirety
- Hard copy in the central office
- Available in appropriate languages for LEP populations, meeting the Safe Harbor Threshold.
- Other, \_\_\_\_\_

<b>Section I:</b>				
<b>Name:</b>				
<b>Address:</b>				
<b>Telephone (Home):</b>			<b>Telephone (Work):</b>	
Electronic Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
<b>Section II:</b>				
Are you filing this complaint on your own behalf?			Yes*	No
*If you answered "yes" to this question, go to Section III.				
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
<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"/> Sex <input type="checkbox"/> Gender Identity <input type="checkbox"/> Sexual Orientation <input type="checkbox"/> Religion				
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.  _____  _____				
<b>Section IV</b>				
Have you previously filed a Title VI complaint with this agency?			Yes	No
<b>Section V</b>				

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?	
<input type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, check all that apply:	
<input type="checkbox"/> Federal Agency: _____	
<input type="checkbox"/> Federal Court _____	<input type="checkbox"/> State Agency _____
<input type="checkbox"/> State Court _____	<input type="checkbox"/> Local Agency _____
Please provide information about a contact person at the agency/court where the complaint was filed.	
<b>Name:</b>	
<b>Title:</b>	
<b>Agency:</b>	
<b>Address:</b>	
<b>Telephone:</b>	
<b>Section VI</b>	
Name of agency complaint is against:	
Contact person:	
Title:	
Telephone number:	

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date required below:

\_\_\_\_\_

Printed Name

\_\_\_\_\_

Signature Date

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

Cheri Perkins Title VI Coordinator  
 LaGrange County Council on Aging/LaGrange County Area Transit  
 PO Box 107  
 LaGrange, IN 46761

**(Appendix 5) – List of Transit Related Title VI Investigations, Complaints and Lawsuits**

*(LaGrange County Council on Aging/LaGrange County Area Transit)*

**Check One:**

There have been no investigations, complaint and/or lawsuits filed against us during the report period.

\_\_\_\_\_

There have been investigations, complaints and/or lawsuits filed against us. *See list below. Attach additional information as needed.*

\_\_\_\_\_

	<b>Date</b> (Month, Day, Year)	<b>Summary</b> (include basis of complaint: race, color, religion, sex, sexual orientation, gender identity, or national origin)	<b>Status</b>	<b>Action(s) Taken</b>
<b>Investigations</b>				
1.				
2.				
<b>Lawsuits</b>				
1.				
2.				
<b>Complaints</b>				
1.				
2.				

**(Appendix 6) – Public Participation Plan**

*(LaGrange County Council on Aging/LaGrange County Area Transit)*

**Strategies and Desired Outcomes**

To promote inclusive public participation, the **LaGrange County Council on Aging and LaGrange County Area Transit** will use its resources available to employ the following strategies, as appropriate:

- ✓ Provide for early, frequent and continuous engagement by the public.
- ✓ Expand traditional outreach methods. Think outside the box: go to hair salons, barbershops, street fairs, faith-based institutions, libraries, etc.
- ✓ Select accessible and varied meeting locations and times
- ✓ Employ different meeting sizes and formats
- ✓ Provide childcare and food during meetings, if possible.
- ✓ Use social media in addition to other resources as a way to gain public involvement
- ✓ Use radio, television or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations may also include audio programming available on podcasts.

**Documented Public Outreach**

The direct public outreach and involvement activities conducted by the **LaGrange County Council on Aging/LaGrange County Area Transit** are summarized in the table below. Efforts include *meetings, surveys, focus groups, etc.*

Information pertinent to each event and/or activity will be provided to INDOT upon request. Examples include copies of: meeting announcements, agendas, posters, attendee list, etc.

Event Date	Section 5310/5311 grantee Staffer(s)	Event	Date Publicized and Communication Method (Public Notice, Posters, Social Media)	Outreach Method (Meeting, Focus Group, Survey, etc).	Notes



## (Appendix 7) Language Assistance Plan

(Sample)

### Plan Components

As a recipient of federal US DOT funding, the **Section 5310/5311 Council on Aging/LaGrange** is required to take reasonable steps to ensure meaningful access to our programs and activities by limited-English proficient (LEP) persons.

**Limited English Proficient (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. This includes those who have reported to the U.S. Census that they speak English less than very well, not well, or not at all.

Most individuals in Indiana read, write, speak and understand English. There are some individuals for whom English is not their primary language. If these individuals have a limited ability to read, write, speak, or understand English, they are considered limited English proficient, or “LEP.”

The **Section 5310/5311 grantee’s** Language Assistance Plan includes the following elements:

- The results of the *Four Factor Analysis*, including a description of the LEP population(s), served.
- A description of how language assistance services are provided by language
- A description of how LEP persons are informed of the availability of language assistance service
- A description of how the language assistance plan is monitored and updated
- A description of how employees are trained to provide language assistance to LEP persons
- Additional information deemed necessary

### Methodology

To determine if an individual is entitled to language assistance and what specific services are appropriate, the **Section 5310/5311 grantee** has conducted a *Four Factor Analysis*<sup>1</sup> of the following areas: 1) Demography, 2) Frequency, 3) Importance and 4) Resources and Costs.

#### *LEP Four Factor Analysis*

- ✓ **Factor 1: Demography:** What is the number or proportion of LEP persons served and the languages spoken in the service area?

#### Overview

The first factor of the *Four Factor Analysis* is the basis of the Language Assistance Plan. It requires the **Section 5310/5311 grantee** to review its US Census data to determine if it meets the *LEP Safe Harbor Threshold*.

---

<sup>1</sup> DOT LEP guidance <https://www.civilrights.dot.gov/page/dots-lep-guidance>

## US Census and American Community Survey (ACS) Data<sup>2</sup>

The **Section 5310/5311 grantee** did the following:

1. Inserted a copy of the **Section 5310/5311 grantee's** LEP data in the Title VI plan. This data was found at:  
<http://www.migrationpolicy.org/sites/default/files/datahub/LEPstate-countyData.xlsx>
2. Analyzed the LEP demographic data for the **Section 5310/5311 grantee's** program and/or service area by calculating the *Safe Harbor Threshold* for two to three of the largest language groups identified other than English.
  - a. The *Safe Harbor Threshold* is calculated by dividing the population estimate for a language group that “Speaks English less than very well” by the total population of the county.
    - i. The *LEP Safe Harbor Threshold* provision stipulates that for each LEP group that meets the LEP language threshold (5% or 1,000 individuals, whichever is less) the **Section 5310/5311 grantee** must provide translation of vital documents in written format for the non-English users.
    - ii. Examples of written translation of vital documents include the Title VI policy statement and/or Notice to the Public (Appendix 2), Title VI Complaint Procedure (Appendix 3), Title VI Complaint Form (Appendix 4), and ADA paratransit eligibility forms.
3. Explained the results of the analysis of the county LEP data in the demographic section of the *Four Factor Analysis*.

✓ **Factor 2: Frequency:** How often does your staff come into contact with LEP persons?

### Overview

LEP persons are persons identified as speaking English less than very well, not well or not at all. Just because a person speaks a language other than English doesn't mean they don't speak English or are identified as LEP. The summary below discusses the frequency with which **Section 5310/5311 grantee** staff comes into contact with LEP persons. It also provides information on the how staff is instructed to meet the needs of LEP persons.

---

<sup>2</sup> The ACS publishes data in many forms on the Census Bureau American Fact Finder website  
<http://factfinder2.census.gov/faces/nav/jsf/pages/searchresults.xhtml>

- ✓ **Factor 3: Importance:** How does the program, service or activity affect people's lives?

Overview

The summary below discusses how the **Section 5310/5311 grantee's** program and services impact the lives of person's within the community. The Section 5310 grantee will specify the community organizations that serve LEP persons, if available.

- ✓ **Factor 4: Resources and Costs:** What funding and other resources are available for LEP outreach?

Overview

The summary below discusses the low cost methods used by the **Section 5310/5311 grantee** to provide outreach to LEP persons as well as train staff on Title VI and LEP principles.

*Additional Required Elements*

In addition to the *Four Factor Analysis (listed below as item #1)*, the Section **5310/5311 grantee** will address the following elements:

*Item #2:* A description of how language assistance services are provided by language

*Item #3:* A description of how LEP persons are informed of the availability of language assistance service

*Item #4:* A description of how the language assistance plan is monitored and updated

*Item #5:* A description of how employees are trained to provide language assistance to LEP persons

*And, any additional information deemed necessary.*

## Section 5310/5311 grantee – Summary of the Language Assistance Plan Components

Item #1 – Results of the Four Factor Analysis (including a description of the LEP population(s) served)

### **Example**

#### Factor 1 – Demography

The **Section 5310/5311 grantee** provides transportation services in USA County (or counties).

The US Census Bureau – American Fact Finder (2008-2012) reports there are numerous languages spoken in USA County. Some of these languages include Spanish, German, Russian, Japanese, Hmong, and Vietnamese. After English, the second largest language group is Spanish.

The Safe Harbor Threshold is calculated by dividing the population estimate for a language group that “speaks English less than very well” by the total population of the county. The LEP Safe Harbor Threshold provision stipulates that for each LEP group that meets the LEP language threshold (5% or 1,000 individuals, whichever is less), the **Section 5310/5311 grantee** must provide translation of vital documents in written format for non-English speaking persons.

In USA County, with a population estimate of 76,816, 535 persons have identified themselves as Spanish speaking and “speaks English less than well”. This language group is less than 1% and below the 5% or 1,000 person threshold. This means the **Section 5310/5311 grantee** is not required to provide written translation of vital documents. All of the other language groups listed above are also below the safe harbor threshold. This means, at this time, the **Section 5310/5311 grantee** is also not required to provide written translation of vital documents in these languages.

Even though the **Section 5310/5311 grantee** is below the safe harbor threshold and is not required to provide written translation of vital documents, it publishes a timetable and route map in Spanish on its website.

In the future, if the **Section 5310/5311 grantee** meets the Safe Harbor Threshold for any language group, it will provide written translation of vital documents in such languages and also consider measures needed for oral interpretation.

#### Factor 2 – Frequency

The **Section 5310/5311 grantee** will be trained on what to do when they encounter a person that speaks English less than well. The **Section 5310/5311 grantee** will track the number of encounters and consider making adjustments as needed to its outreach efforts to ensure meaningful access to all persons and specifically to LEP and minority populations of the **Section 5310/5311 grantee’s** programs and services.

The **Section 5310/5311 grantee’s** provides rides to XX persons per year. While formal data has not been collected, the Section 5310/5311 grantee has indicated it has encountered (2) two LEP persons using the service within the last six months.

#### Factor 3 – Importance

The **Section 5310/5311 grantee** understands an LEP person with language barrier challenges also faces difficulties obtaining health care, education or access to employment. A transportation system is a key link to connecting LEP persons to these essential services.

The **Section 5310/5311 grantee** has identified activities and services which would have serious consequences to individuals if language barriers prevented access to information or the benefits of those programs. The activities and services include providing emergency evacuation instructions in our facilities, stations and vehicles and providing information to the public on security awareness or emergency preparedness.

The **Section 5310/5311 grantee's** assessment of what programs, activities and services that are most critical included contact with community organization(s) that serve LEP persons, as well as contact with LEP persons themselves to obtain information on the importance of the modes or the types of services that are provided to the LEP populations.

#### Factor 4 – Resources and Costs

Even though the **Section 5310/5311 grantee** does not have a separate budget for LEP outreach, the Section 5310/5311 grantee has worked to implement low cost methods of reaching LEP persons. For example, the **Section 5310/5311 grantee** has a Spanish speaking person on staff. This has ensured the **Section 5310/5311 grantee** can provide assistance to LEP Spanish-speaking persons, if needed. In addition, the **Section 5310/5311 grantee** will work with local advocacy groups to reach LEP populations.

Item # 2 – Description of how Language Assistance Services are Provided, by Language
--

#### **Example**

The **Section 5310/5311 grantee** has a bilingual speaking person on staff. In addition, we work to ensure mechanisms are in place to reach LEP persons in the service area. For example, we have a special brochure printed and is available in each vehicle to assist LEP populations in understanding the transportation service.

For example, any language barriers or LEP assistance will be identified through our intake process before a client begins services with our agency. At the time of intake, a translator will be made available to communicate our agency policies and procedures, including transportation. Additional tools will be determined at that time to assess the needs for future communication tools.

Item # 3 - Description of how LEP Persons are Informed of the Availability of Language Assistance Service
---

#### **Example**

The **Section 5310/5311 grantee** does the following to inform LEP persons of the availability of language assistance services: publishing timetables and route maps in languages other than English, provide pictograms and other symbols in relevant published materials, striving to employ multilingual staff, and creating and posting multi-language announcements, posters and other information.

The **Section 5310/5311 grantee** also attends Latin festivals and functions in the area for the LEP population. The cost is relatively low but the ability to reach the LEP population is high. The **Section 5310/5311 grantee** will continue to reach out to LEP populations by visiting ethnic meal sites and/or community centers and groups, local non-English speaking churches, and local stores or markets catering to immigrants/non-English speaking populations.

Item # 4 – Description of how the Language Assistance Plan is Monitored and Updated

**Example**

*The **Section 5310/5311 grantee** reviews its plan on an annual basis or more frequently as needed. In particular, the **Section 5310/5311 grantee** will evaluate the information collected on encounters with LEP persons as well as public outreach efforts to determine if adjustments should be made to the delivering of programs and services to ensure meaningful access to minority and LEP persons.*

Item # 5 - Description of how Employees are Trained to Provide Language Assistance to LEP Persons

**Example**

***Section 5310/5311 grantee** employees are educated on the principles of Title VI and the **Section 5310/5311 grantee's** Language Assistance Plan. New employees will be provided guidance on the needs of clients served and how best to meet their needs.*

*An important discussion point is that of language assistance. If a driver, dispatcher or employee needs further assistance related to LEP program participants, her/she will work with the **Section 5310/5311 grantee's** Title VI Coordinator to identify strategies to meet the language needs of the participants of the program or service.*

## (Appendix 8) – Minority Representation Information

### Sample

#### A. Minority Representation Table

The table below depicts the **LaGrange County Council on Aging/LaGrange County Area Transit's** three committees and councils related to transit: the grantee's Board of Directors and its Transportation Advisory Committee.

Body	Caucasian	Hispanic	African American	Asian American	Native American
Population	98.2%	3.9%	0.4%	0.4%	0.3%
Board of Directors	100%	0%	0%	0%	0%
Transportation Advisory Committee	100%	0%	0%	0%	0%

#### B. Efforts to Encourage Minority Participation

The **Section 5310/5311 grantee** understands diverse representation on committees, councils and boards results in sound policy reflective of its entire population. As such, the **Section 5310/5311 grantee** encourages participation of all its citizens. As of January 2013, with the exception of the Access Committee, all races residing in the **Section 5310/5311 grantee** were represented on the three transit-related committees/ councils. As vacancies on boards, committees and councils become available, the **Section 5310/5311 grantee** will make efforts to encourage and promote diversity. To encourage participation on its boards, committees and councils, the **Section 5310/5311 grantee** will continue to reach out to community, ethnic and faith-based organizations to connect with all populations. In addition, the **Section 5310/5311 grantee** will use create ways to make participating realistic and reasonable. Such as, scheduling meetings at times best suited to its members and providing transportation and child care, if needed for its members.

### Sample

#### Minority Representation Data Collection Form

Name of board, commission, council, etc.

Date:

---

Dear Member,

As the **Section 5310/5311 grantee** is a recipient of federal funds, we are required under Title VI of the Civil Rights statute to ascertain the racial/ethnic make-up of any non-elected boards, commissions, councils, etc.

Data from this section is used for statistical and reporting purposes. The information may be subject to disclosure under federal or state law or rule.

## Anti-Discrimination Notice

It is unlawful for the **Section 5310/5311 grantee** to fail or refuse to provide services, access to services or activities, or otherwise discriminate against an individual because of an individual's race, color, religion, sex, sexual orientation, gender identity, national origin, disability or veteran status.

As a council under the jurisdiction of the **Section 5310/5311 grantee**, we invite council members to voluntarily self-identify their race/ethnicity in order for us to comply with FTA Title VI regulations. This information will be used according to the provisions of applicable federal and state laws, executive orders and regulations, including those requiring the information to be summarized and reported to the federal government for civil rights enforcement purposes.

### Race/Ethnicity

If you choose to self-identify, please mark the **one box** describing the race/ethnicity category with which you primarily identify:

\_\_\_ *Asian or Pacific Islander*: All persons having origins in any of the peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands. This area includes, for example, China, Japan, Korea, the Philippine Islands and Samoa.

\_\_\_ *Black and/or African American* (not of Hispanic origin): All persons having origins in any of the Black racial groups of Africa.

\_\_\_ *Hispanic*: All persons of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race.

\_\_\_ *American Indian or Alaskan Native*: All persons having origins in any of the original peoples of North America, and who maintain cultural identification through tribal affiliation or community recognition.

\_\_\_ *Caucasian* (not of Hispanic origin): All persons having origins in any of the original peoples of Europe, North Africa or the Middle East.

Note: The Minority Representation Data Collection Form is an optional tool for the subrecipient. Completed forms are not required to be submitted with the Title VI plan.