TITLE VI PLAN

Transit Authority of Stone City (TASC) 2022

 ${\bf Title~VI~Contact:~Dennis~Parsley~/~Transportation~Director}$

Title VI Contact Phone: 812-275-1800 TTY Number: 1-800-743-3333

Title VI Contact Email: dparsley@bedford.in.us
Address: 1619 K Street Bedford, IN. 47421

Web Address: www.bedford.in.us

Table of Contents

I. Introduction	
TASC's Commitment to Civil Rights	1
II. General Requirements	2
Notice to the Public	2
Discrimination Complaint Procedures	2
The Procedure	3,4,5,6
Active Lawsuits, Complaints or Inquiries Alleging Discrimination	6
III. TASC's Public Participation Plan	7
Key Principles	7
Limited English Proficient (LEP) Goals of the Public Participation Plan	7
Objectives of the Public Participation Plan	7
Regional Partnership/Capital Programming	8
IV. TASC's Public Participation Process	8
Outreach Efforts – Alerting Riders and Encouraging Engagement	8
Selection of Meeting Locations	9
ABC Mediums	9
Addressing Comments	
The Incorporation of Public Comments into Decisions	10
Identification of Stakeholders	10
Our Community Partners	10
Stakeholder List	10
V. Decision Making Bodies	11
Non-Elected Committees and Councils	11
Transit Advisory Committee (TAC)	11
VI. Summary of Changes	11
Service Change Evaluations Since [date of last plan]	11
Program Specific Requirements	11
Title VI Monitoring	11
Subrecipient Compliance	11
Equity Analysis for Facility	12
VII Grants Reviews and Certifications	12

	Pending Applications for Financial Assistance	12
	Civil Rights Compliance Reviews in the Past 3 Years	12
	Recent Annual Certifications and Assurances	
	Contact	12
VIII.	Language Assistance Plan	13
	Improving Access for People with Limited English Proficiency (LEP)	13
	Factor 1	13
	Service Area Overview	13
	The Locations of the LEP Community	15
	Factor 2	15
	Factor 3	21
	Factor 4	22
	Outcomes	23
	New tools and alerting riders of language assistance	23
	Oversight	23
	Monitoring, Evaluating and Updating the Language Assistance Plan and Public	23
Po	ost Event Assessment	22
	raining Employees	
	afe Harbor Provisions	
	itle VI Equity Analysisked Route Transit Provider Analysis	
	rvice Standards	
50		

I. INTRODUCTION

TASC'S COMMITMENT TO CIVIL RIGHTS

This update of TASC Transit's Title VI Program has been prepared to ensure that the level and quality of TACS's demand response services are provided in a nondiscriminatory manner and that the opportunity for full and fair participation is offered to TASC's riders and other community members. Additionally, through this program, TASC 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 TASC 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 TASC'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), TASC 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 TASC'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

Your Civil Rights

TRANSIT AUTHORITY OF STONE CITY (TASC) 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 TASC. For more information on TASC's civil rights program and the procedures to file a complaint, please contact 812-275-1800; email dparsley@bedford.in.us or visit our administrative office at 1619 K Street Bedford, IN. 47421 from 8am – 4pm 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 TASC programs and services, visit www.bedford.in.us. If information is needed in another language, please contact TASC AT 812-275-1800.

Discrimination Complaint Procedures

TASC 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 TASC may file a Title IV complaint by completing and submitting the agency's Title VI Complaint available at our administrative offices 1619 K Street Bedford, IN. 47421 or on our website www.bedford.in.us.

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

External Complaint of Discrimination form and instructions:

If you believe that you have received discriminatory treatment by TASC on the basis of race, color, or national origin you have the right to file a complaint with the ADA Title VI Coordinator Brandon Woodward or Transportation Director Dennis Parsley.

Methods of filing a complaint:

Complete the Complaint Form, and send it to:

Dennis Parsley 1619 K Street Bedford, IN. 47421 dparsley@bedford.in.us

Brandon Woodward 1102 16th Street Bedford, IN. 47421 bwoodward@bedford.in.us

Verbal complaints are accepted and transcribed by Dennis Parsley. To make a verbal complaint, call 812-275-1800 and ask for Dennis Parsley.

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

TASC has up to sixty days to investigate the complaint. If more information is needed to resolve the case, the ADA Coordinator or TASC 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.

Complaints must be in writing and signed by the complainant(s) and must include the complainant(s) name, address and phone number. The ADA/Title VI contact person will assist the complainant with documenting the issue if necessary in cases where the complainant is unable or incapable of providing a written statement.

- 1. Allegations received by fax or email will be acknowledged and processed once the identity of the complainant(s) and the intent to proceed with the complaint have been established. For this, The complainant is required to mail a signed, original copy of the fax or email transmittal for the complaint to be processed.
- 2. Allegations received by telephone will be reduced to writing and provided to the complainant for confirmation or revision before processing. A complaint form will be forwarded to the complainant for him/her to complete, sign and return for processing.

If TASC's investigator is not contacted by the complainant or does not receive the additional Information within thirty days, TASC can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

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

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

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

Transit Authority of Stone City (TASC)

Title VI Complaint Form

Section I:				
Name:	and the state of th	Alexandria (1997) Sec. of American (1998) Sec. of American (1998)		
Address:				
Telephone (Home):		Telephone (Work):	
Electronic Mail Address:				
Accessible Format	Large Print	A	udio Tape	
Requirements?	TDD		Other	
Section II:				
Are you filing this complaint	on your own behalf?		Yes*	No
*If you answered "yes" to thi	s question, go to Section III.			
If not, please supply the nam you are complaining:	e and relationship of the person	for whom		
Please explain why you have	filed for a third party:	• • • • • • • • • • • • • • • • • • • •		
Please confirm that you have	obtained the permission of the	aggrieved	Yes	No

party if you are filing on behalf of a third party.				
Section III:				
I believe the discrimination I experienced was based of	on (check all tha	t apply):		
[] Race [] Color	[] National O	rigin		
Date of Alleged Discrimination (Month, Day, Year):				
Explain as clearly as possible what happened and why Describe all persons who were involved. Include the n discriminated against you (if known) as well as names space is needed, please use the back of this form.	ame and contac	t information of the	person(s) who	
Section IV				
Have you previously filed a Title VI complaint with this ag	gency?	Yes	No	
Section V				
Have you filed this complaint with any other Federal, Scourt?	State, or local ag	ency, or with any Fe	deral or State	
[] Yes [] No				
If yes, check all that apply:				
[] Federal Agency:				
[] Federal Court	[] State Agen	су		
[] State Court	[] Local Agen	cy		
Please provide information about a contact person at t	he agency/cou	t where the complai	nt was filed.	
Name:		-		
Title:				
Agency:				
Address:				
Telephone:			-	
Section VI				
Name of agency complaint is against:				
Contact person:				
Title:		·		
Telephone number:				

You may attach any written materials or in	formation that you think is relevant to your complain
Signature and date required below:	
Signature	Date
Please submit this form in person at the ad Transit Authority of Stone City (TASC)	dress below, or mail this form to:

Transit Authority of Stone City (TASC)

Dennis Parsley Transportation Director

1619 K Street

Bedford, IN. 47421

Active Lawsuits, Complaints or Inquiries Alleging Discrimination

TASC maintains a list of active investigations conducted by FTA and entities other than FTA, including lawsuits and complaints naming TASC 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 TASC in response, or final findings related to the investigation, lawsuit, or complaint.

As of the writing of this program, there are 0 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

			0 0		
Туре					
(Investigation,					
Lawsuit,					Action(s)
Complaint)	Date	Summary of Complaint		Status	Taken
					l

III. TASC'S PUBLIC PARTICIPATION PLAN

Key Principles

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

Through an open public process, TASC has developed a public participation plan to encourage and guide public involvement efforts and enhance access to TASC'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 TASC 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 TASC'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 TASC 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 TASC develops and maintains partnerships with communities through the methods described in its public participation plan.
- Quality Input and Participation Aim to have comments received by TASC which are useful, relevant and constructive, contributing to better plans, projects, strategies and decisions.

Objectives of the Public Participation Plan

TASC'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 TASC will proactively reach out to and engage low income, minority and LEP populations from the TASC 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 TASC 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.

TASC 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, TASC will post service change notices on appropriate buses and stops sixty days in advance of the change date.

IV. TASC'S PUBLIC PARTICIPATION PROCESS

Outreach Efforts - Alerting Riders and Encouraging Engagement

TASC's PPP includes many mediums extending beyond the traditional approach which relied on legal notices and intermittent media coverage. While TASC maintains these elements to its outreach program along with

traditional seat-drop flyers, TASC 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 by the City of Bedford Board of Public Works and Safety;
- 3. Proposals are reviewed by TASC Transit Advisory Committee;
- 4. A Title VI review of the proposal is conducted;
- 5. Public outreach venues, dates and times are determined with consideration of the proposed changes and their impact on specific locations/populations within the TASC service area;
- 6. Bilingual public outreach materials and a program are developed as needed based on current Census American Community Survey data and meeting the Safe Harbor Threshold. Currently, City of Bedford does not meet this threshold;
- 7. Outreach In advance of public information sessions is released (using tool-box of mediums listed below);
 - 1. Local radio station(s)
 - 2. The public comment periods
 - 3. TASC TAC Board is presented a summary detailing the outcome of the public participation process along with staff recommendations;
 - 4. The final service/fare change date is set;
 - 5. Outreach is conducted in advance of any service or fare change;
 - 6. Website updated in advance of the proposed change.

Selection of Meeting Locations

When determining locations and schedules for public meetings, TASC 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 radio or newspaper ads 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.

TASC Mediums

Print – Newspapers and other publications such as comment forms or agency brochures or other periodicals.

- Outdoor Advertising on-board buses (interior and exterior) and in bus shelters
- Website City of Bedford has assembled a comprehensive website as well as posted information within City Hall.
- Web-Based Feedback (Report It, Shout It, Suggest It, How Are We Doing, and Tell Us Your Story).
- Social Media TASC has used Facebook since 2009 to help engage community
- Radio (if available and appropriate)
- Seat Drops, On-board Flyers TASC regularly uses seat drops and flyers to provide riders with details of service changes and schedules of public meetings and hearings.
- Public Information Sessions
- Public Hearings
- Legal Notices
- Partnered with other local agencies to advertise services provided
- Posted the Nondiscrimination Public Notices to the following locations:
 - Within Transportation Vehicles
 - o Pick up and drop off stations
 - o Lobby of agency and City Hall

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 such as <u>mail</u>, <u>email</u>, <u>social media</u>, <u>public meetings and others</u>, all comments are assembled into a single document for presentation to the TASC Board of Public Works 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, TASC has assembled a listing of stakeholders with whom we regularly communicate through public media. A complete list of TASC's community stakeholders can be obtained by contacting TASC.

Stakeholder List

Any community organization or person can be added to the TASC stakeholder list and receive regular communications regarding service changes by contacting the TASC administrative office at 812-275-1800. Local organizations and businesses can also request that a speaker from TASC attend their regular meeting at the same number or through the City of Bedford website www.bedford.in.us.

V. DECISION MAKING BODIES

Non-Elected Committees and Councils

At TASC, decisions regarding policy, service changes, fares, capital programming and facility locations are made by City of Bedford Board of Public Works and Safety. The Board of Public Works and Safety is composed of 3 members representing the City of Bedford. Transit Advisory Committee (TAC) who hold quarterly meetings to help to guide decisions regarding routes, schedules, and other topics important to the community and our riders. Meetings of the City of Bedford Board of Public Works and the Transit Advisory Committee are always open to the public, held at Bedford City Hall, 1102 16th Street Bedford, IN. 47421 or City Concourse 1402 H Street Bedford, IN. 47421.

Transit Advisory Committee (TAC)

This committee is open to the public and comprised of all passengers representing various bus routes. At the quarterly meetings, members discuss all aspects of TASC's services from the perspective of the public. This group offers an invaluable service to TASC. Membership is voluntary and it changes from time to time. This group has been meeting for over 15 years. Presently there are 9 members.

Body	Caucasian	African	Hispanic	Asian	Race 4	Race 5
		American				
Transit Advisory	7	1	1		-	
Committee						

VI. SUMMARY OF CHANGES

Service Change Evaluations Since August 2015

Since TASC's 2015 Title VI Plan Submission there has been 1change in TASC's fare structure. There have been 0 service changes.

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

Program Specific Requirements

<u>Title VI Monitoring</u> (August 2015 Title VI Plan)

The results of the ongoing monitoring of service standards as defined in the TASC's 2015 program can be obtained by contacting Dennis Parsley, Transportation Director or Brandon Woodward Planning/Zoning Director and ADA Coordinator.

<u>Subrecipient Compliance</u>

No review since last submission

Demographic Service Profile

Because TASC 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

None at this time

Civil Rights Compliance Reviews in the Past 3 Years

TASC has not been the subject of any such reviews since its August 2015 submission

Recent Annual Certifications and Assurances

TASC executed its most recent Certifications and Assurances to the FTA in December of 2021 and is in the process of executing 2022 certifications and assurances.

Contact

For additional information on the TASC 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:

Dennis Parsley Transportation Director City of Bedford 812-275-1800 dparsley@bedford.in.us

or

Brandon Woodward
Planning/Zoning Director
ADA Coordinator
City of Bedford
812-275-1631
bwoodward@bedford.in.us

VII. LANGUAGE ASSISTANCE PLAN

Improving Access for People with Limited English Proficiency (LEP)

In order to ensure meaningful access to programs and activities, TASC uses the information obtained in a U.S. Department of Transportation Four Factor LEP Analysis to determine the specific language services that are appropriate. This analysis helps TASC to determine if it communicates effectively with LEP persons and informs language access planning. A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English. Any languages identified in the four-factor analysis will be provided vital documents and information in the language requested.

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 TASC program, activity or service.
- 2. The frequency with which LEP persons come into contact with TASC services and programs;
- 3. The nature and importance of TASC's services and programs in the LEP population's lives; and
- 4. The resources available to TASC 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 TASC'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, TASC 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 5-yearAmerican Community Survey 2019. Data was reviewed by TASC's Tac Board and City Leaders in its entirety.

Service Area Overview

TASC's service area encompasses approximately 12 square miles of Lawrence County and is home to a population speaking more than 3 different languages. Of the 12,608 residents in the Transit Authority of Stone City (TASC) service area 57 residents describe themselves as speaking English less than "very well". People of Asain descent are the primary LEP persons likely to utilize TASC services. For the TASC service area, the American Community Survey of the U.S. Census Bureau shows that among the area's population 98% speak English "very well". For groups who speak English "less than very well", 2.5% speak Filipino and 1.7% speak Vietnamese.

	Bedford city, Indiana			
Label	Estimate	Margin of Error		
Total:	12,608	±157		
Speak only English	12,370	±189		
Spanish:	122	±81		
Speak English "very well"	65	±48		
Speak English less than "very well"	57	±52		
French, Haitian, or Cajun:	14	±19		
Speak English "very well"	0	±19		
Speak English less than "very well"	14	±19		
German or other West Germanic languages:	0	±19		
Speak English "very well"	0	±19		
Speak English less than "very well"	0	±19		
Russian, Polish, or other Slavic languages:	15	±25		
Speak English "very well"	15	±25		
Speak English less than "very				
well"	0	±19		
Other Indo-European				
languages:	8	±13		
Speak English "very well"	8	±13		
Speak English less than "very well"	0	±19		
Korean:	0	±19		
Speak English "very well"	0	±19		
Speak English less than "very well"	0	±19		
Chinese (incl. Mandarin, Cantonese):	9	±16		
Speak English "very well"	9	±16		
Speak English less than "very well"	0	±19		
Vietnamese:	38	±39		
Speak English "very well"	16	±25		
Speak English less than "very well"	22	±32		
Tagalog (incl. Filipino):	32	±48		

Speak English "very well"	0	±19
Speak English less than "very well"	32	±48
Other Asian and Pacific Island		
languages:	0	±19
Speak English "very well"	0	±19
Speak English less than "very		
well"	0	±19
Arabic:	0	±19
Speak English "very well"	0	±19
Speak English less than "very		
well"	0	±19
Other and unspecified		
languages:	0	±19
Speak English "very well"	0	±19
Speak English less than "very		
well"	0	±19

Factor 2 - Frequency of LEP Use

There are many places where TASC riders and members of the LEP population can come into contact with TASC services including the use of fixed route and demand response buses, calls to customer service representatives, reservation agents and TASC's outreach materials. An important part of the development of TASC'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 TASC's customer service staff;
- Bus pass sales;
- Printed outreach materials;
- · Web-based outreach materials;
- · Public meetings;
- Demand response reservation agents;
- Local news media (print and radio);
- · Automatic, service related audio announcements on-board TASC buses; and
- Service related posters at TASC's bus terminal.

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

Method of Interaction	Percent of Responses		
Telephone	<u>60</u>		
Face to Face	<u>60</u>		
Email	<u>0</u>		
Fax	0		

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

Frequency of Interaction	Percent of Responses
Often	20
Sometimes	20
Rarely	40
Never	0

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

Language	Percent of Interactions
Chinese	20
English	80

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

Effectiveness	Percent of Total Responses
Very Effective	60
Moderately Effective	40
Less Effective	0
Unable to Communicate	0

Community Partners

TASC 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?

Information on survey of partners or potential partners

Question	<u>Partner Name</u>	<u>Partner Name</u>	Partner Name
Do you encounter non-	N/A		
English			
speaking/reading			
people who need your			
services?			
If so, what are the top	<u>N/A</u>		
three languages that			
you encounter?			
How do you address	<u>N/A</u>		
language barriers?			
Do you find language	N/A		
to be a barrier in	,		
preventing you from			
providing service?			

Consulting Directly with the LEP Population

In addition to the U.S. Census data, employee survey, and outreach to community partners, TASC implemented a survey of its riders. A copy of the survey is attached below.

2022 INDIANA PUBLIC & HUMAN SERVICE TRANSPORTATION NEEDS SURVEY

Please complete this survey about your transportation needs and preferences. This information will be used in your local area's Coordinated Public Transit-Human Service Transportation Plan. For more information please contact Dennis Parsley / TASC Transportation Director at 812-275-1800. Thank you!

Ţ.	What forms of transportation do you use? Select all that apply. Answered 7						
	Public transit that serves your city or county, including bus systems, rail lines, ADA paratransit, or general public demand response/dial-a-ride		Rely on family/friends forrides Response 28.57% - 2				
	Response 85.71% - 6		Carpool or vanpool to work				
			Response 0%				
	Medicaid Non-emergency medical		Uber/Lyft				
	transportation (NEMT)		Response 0%				
	Response 14.29% - 1						

	Demand response/dial-a-ride servicest			Taxi
	for specific groups only – for example adults or people with disabilities (this ADA complementary paratransit provipublic transit systems)	excl	udes	Response 0%
	Response 0%			
	Transportation offered by volunteer or based groups	faith	1-	
	Response 28.57% - 2			
	Drive your own vehicle			
	Response 0%			
	Other (please specify) Response 14.29	% -	· <u>1</u>	
	ride, please tell us the name(s) of the s		-	lic transit or demand response/dial-a- 7 Answered
	f Service 1: 100% TASC	م	~ .	
	f Service 2: 28.57% Lawrence County	<u>Can</u>	cer Services	
Name of	Service 3: <u>0%</u>			
	nat changes could be made to your loca ore appealing to you? Answered 5	al tr	ansportatio	n options to make using them
	If I could ride to other parts of the state (such as Indianapolis or other cities/towns) Response 40% - 2			at my home and take me my destination 20% - 1
	Lower the cost to ride		Increase he	ealth and safety precautions
	Response 0%		Response	0%

Start earlier in the morning Response 0%		Run fixed route service more frequently (for example, make a bus route run every30 minutes instead of every 60 minutes)
		Response 40% - 2
End later at night		Increase the amount of demand response/dial-a-
Response 20% -1		ride service available (forexample, operate more vehicles so there are fewer turn-downs for trip
Operate on Saturdays		requests)
Response 40% - 2		Response 0%
Operate on Sundays		Make scheduling demand response/dial-a-ride
Response 0%		service more convenient (for example, allow for same-day or on- demand trip requests)
		Response 20% - 1
		Make it easier, or add the option, for children, spouses and/or caregivers toride along
		Response 0%
Other (please specify)		
	<u></u>	

4. Do you have difficulty getting the transportation you need to any of the following types of destinations? Answered 7

	No difficulty	Sometimes difficult	Frequently difficult	Always difficult	Not applicable to me
Your employer	25%	0%	0%	0%	75%
Medical offices, clinics or hospitals	33.33%	33.33%	0%	16.67%	16.67%
Mental health care Dental care	.25% 66.67%	0%	0% 0%	25% 16.67%	50% 16.67%

Pharmacy	50%	16.67%	0%	0%	33.33%
Shopping	50%	0%	0%	0%	33.33%
School	20%	Ò%	0%	0%	80%
Human service agencies or government offices	50%	0%	0%	0%	50%
Other trip purposes	25%	0%	0%	0%	75%
Do you need to travel to des	stinations ou	tside of you	r county for work,	medical care	,

in the second second	Other trip purposes		25% 09	%	0%	0%
			destinations outsidens? Answered 7	of your c	ounty for wo	rk, medical ca
[□ No 57.1	4% - 4				
[☐ Yes, for wo	ork 0%				
[\square Yes, for me	edical care 2	8.75% - 2			
	\square Yes, for sho	opping 14.2 9	9% - 1			
		·	please specify)			
	14.29% - 1					
			vel outside of your coed 6 with 1 skipping	-	yes, please ii	ndicate what
	Yes 66.6	7% - 4				
	No 33.3	3% - 2				
	~ -	•	d to travel outside my	county)	f yes, please	provide more
info	rmation: <u>0%</u>)				

7. W	hat is your ag	ge group? A	uswered 6 with 1 sk	cipping		
	Under 18	0%				
	18-54	50%				
	55-59	16.67%				
	60-64	16.67%				
	65+	16.67%				

8. D	8. Do you have a disability which requires you to use a cane, walker, wheelchair, and/or							
8	another (device, or a service animal, to help you get around? Answered 7						
	Yes	28.57% - 2						
П	No	71.43% - 5						

- 9. What County do you live in? Lawrence -7 answered
- 10. What is your ZIP code? 47421 7 answered
- 11. Do you have other comments about transportation services in your community? 5 responses listed below.
 - 1. This is extremely essential for those with fixed income, no transportation of their own and who do not know anyone inside the city who is an individual to ask for help.
 - **2.** Calling 24 hours prior, phones are turned off at 4pm and 12:00-1 pm, and not always get help getting off bus is very troublesome to me.
 - **3.** They are very professional from calling to being on the bus, friendly and the buses are kept clean, have always had an optimistic assurance in their voice for our day. Very appreciated!
 - **4.** Tasc bus is convenient and has very polite drivers.
 - 5. Please go back to me calling local ag my rides up. I have not been able to get a ride to my doctor in over a year or more. I call 800 number and set up and then nothing is arranged with local places. I call local places and they have no idea of my appointments. I am paying family members to take me to doctor now. It is 20\$ a trip now to Bedford and back.

Factor 3 - The Importance of TASC Service to People's Lives

Access to the services provided by TASC are critical to the lives of many in the service area. Many depend on TASC'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.

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 TASC 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 TASC vehicles.

The TASC 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 TASC.

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

To file a complaint contact TASC at 812-275-1800 or www.bedford.in.us or send a letter to 1619 K Street Bedford, IN. 47421. A complaint may also be filed directly with the FTA, Office of Civil Rights, 1200 New Jersey Avenue SE, Washington DC 20590.

La companía TASC garantiza que ninguna persona, por motivos de raza, color, o origen nacional estén excluida de la participación o negado de los beneficios o ser subjeto de discriminación en respecto a los servicios proveidos de la Authoridad 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 subjeto de discriminación por motivos de raza, color, o origen nacional puede presentar una queja a la companía TASC dentro de los 180 días siguientes a la fecha de la supuesta discriminación.

Para presentar una queja al TASC, llame al 812-275-1800 or www.bedford.in.us, o escribe una calta y envia a 1619 K Street Bedford, IN. 47421 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

TASC has committed resources to improving access to its services and programs for LEP persons. Today, bilingual Title VI information is provided in English and TASC will provide information if other language translation is needed.

Outcomes

New tools and alerting riders of language assistance

Following the "Four Factor Analysis", TASC concluded that we are aware of the following tools and resources and will incorporate into our services if the four-factor analysis indicates the need for us to do so in the future.

Oversight

<u>Monitoring, Evaluating and Updating the Language Assistance Plan and Public Participation Process</u>

The monitoring of the Language Assistance Plan will include:

- Annual reviews of regional census data for changing patterns of LEP populations;
- Update the policy every three years;
- Ongoing collaboration with regional partners:
- ♦ Post Event Assessments (PEA)

Post-Event Assessments

Following service changes, fare increases and planning projects the Mayor, Transportation Director and Operations Manager assess the effectiveness of public involvement against the goals established in this plan. This assessment will ask the questions:

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

Training Employees

TASC 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. TASC 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

Safe Harbor Provisions for written translations

Transit Authority of Stone City (TASC) complies with the Safe Harbor Provision with respect to Title VI information, the following shall be made available in:

- 1. Non-Discrimination Notice
- 2. Discrimination Complaint Procedures
- 3. Discrimination Complaint Form

TASC is in the process of translating many documents into other languages that will meet the services of the transit riders within this community: The list of documents that are or will be translated is provided below:

- ♦ Civil Rights Complaint Form
- ♦ ADA Eligibility Applications
- ♦ ADA Service Overview Booklet
- ♦ Service change announcements
- On-board notices
- ♦ Notification of free language services
- ♦ Maps and schedules, rider information, ADA service information, news and event announcements
- ♦ Service Complaint Forms

IX. TITLE VI EQUITY ANALYSIS

Title 49 CFR, Appendix C, Section (3)(iv) requires that "the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin." For purposes of this requirement, "facilities" does not include bus shelters, as they are considered transit amenities. It also does not include transit stations, power substations, or any other project evaluated by the National Environmental Policy Act (NEPA) process. Facilities included in the provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. In order to comply with the regulations, TASC will ensure the following:

1. TASC will complete a Title VI equity analysis for any facility during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. TASC will engage in outreach to persons potentially impacted by the siting of the facility. The Title VI equity analysis must compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.

- 2. When evaluating locations of facilities, TASC will give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the Census tract or block group level where appropriate to ensure that proper perspective is given to localized impacts.
- 3. If TASC determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, TASC may only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. TASC must demonstrate and document how both tests are met. TASC will consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

TASC has not recently constructed any facilities, nor does it currently have any facilities in the planning stage. Therefore, TASC does not have any Title VI Equity Analysis reports to submit with this Plan.

X. Fixed Route Transit Provider Analysis

TASC is not a fixed route service provider.

SERVICE STANDARDS

FTA requires that all fixed route transit providers develop quantitative standards for all fixed route modes of operation for the following indicators. TASC has prepared standards for all modes it operates.

a. Vehicle Load

Vehicle Type	Average Passenger Capacities				
	Seated	Standing	Total	Maximum Load Factor	
22' 16 Passenger Cutaway Bus	16	0	16		

b. On-Time Performance

A vehicle is considered on time if it departs a scheduled time point no more than 5 minutes early and no more than 5 minutes late. The TASC on-time performance objective is 90% or greater. TASC continuously monitors on-time performance and system results.

c. TASC operates in the daytime hours Monday – Friday from 6am to 6pm. There is no TASC service provided on Saturdays or Sundays. TASC is a Demand Response service and has no designated sections of town for any one specific bus. TASC also works on a 24 hour call ahead service.

Dennis Parsley

Transportation Director

02/10/2022

02/10/2022 Date

Brandon Woodward

Planning/Zoning Director ADA Title VI Coordinator

Mayor Samuel J. Craig

City of Bedford