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## **I. INTRODUCTION**

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### **COMMUNITY SERVICES OF STARKE COUNTY'S COMMITMENT TO CIVIL RIGHTS**

This update of **Community Services of Starke County** Transit's Title VI Program has been prepared to ensure that the level and quality of **Community Services of Starke County's demand response services** are provided in a nondiscriminatory manner and that the opportunity for full and fair participation is offered to **Community Services of Starke County's** riders and other community members. Additionally, through this program, **Community Services of Starke County** 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 **Community Services of Starke County** 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 **Community Services of Starke County'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), **Community Services of Starke County** 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 **Community Services of Starke County's** service planning and development process;
- ◆ Decisions regarding service changes or facility locations are made without regard to race, color, or national origin and that development and urban renewal benefitting a community as a whole not be unjustifiably purchased through the disproportionate allocation of its adverse environmental and health burdens on the community's minority population; and
- ◆ A program is in place for correcting any discrimination, whether intentional or unintentional.

## II. GENERAL REQUIREMENTS

### Notice to the Public

To make **Community Services of Starke County** riders aware of its commitment to Title VI compliance, and their right to file a civil rights complaint, **Community Services of Starke County** has presented the following information, in both English and **Spanish** on its [**website ride guide, onboard bus, schedules, posters at transfer centers, etc.**]

### *Your Civil Rights*

*Community Services of Starke County Transit (Community Services of Starke County) 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 Community Services of Starke County For more information on Community Services of Starke County's civil rights program and the procedures to file a complaint, please contact [**Community Services of Starke County 574-772-7070**]; email, [jrogers@starkecs.com] or visit our administrative office at [**311 E. Culver Rd, Knox, IN 46534**] from [**8:00am-4:00pm**]. 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 Community Services of Starke County programs and services, visit [**www.communityservicesofstarkecounty.org**]. If information is needed in another language, please contact [**574-772-7070**].*

### Discrimination Complaint Procedures

**Community Services of Starke County** 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 **Community Services of Starke County** may file a Title IV complaint by completing and submitting the agency's Title VI Complaint available at our administrative offices or on our website [**www.communityservicesofstarkecounty.org**].

**Community Services of Starke County** will notify INDOT of all formal complaints within five business days of receiving the complaint.

# Discrimination Complaint Form

## Title VI and ADA

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

If yes, please provide any reference information regarding your previous complaint.

**Section V**

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

Yes       No

If yes, check all that apply:

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

Federal Court: \_\_\_\_\_       State Agency: \_\_\_\_\_

State Court: \_\_\_\_\_       Local Agency: \_\_\_\_\_

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

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

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

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

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

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

**Section VI**

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

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

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

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

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

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

Signature \_\_\_\_\_

Date \_\_\_\_\_

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

Community Services of Starke County  
Janet Rogers, Transportation Program Coordinator  
311 E. Culver Road  
Knox, IN 46534  
574-772-7070  
[jrogers@starkecs.com](mailto:jrogers@starkecs.com)

A copy of this form can be found online at [www.communityservicesofstarkecounty.org](http://www.communityservicesofstarkecounty.org)

## The Procedure

If you believe that you have received discriminatory treatment by the COMMUNITY SERVICES OF STARKE COUNTY on the basis of race, color, or national origin you have the right to file a complaint with the **COMMUNITY SERVICES OF STARKE COUNTY [Janet Rogers]**.

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

Complete the Complaint Form, and send it to:

Janet Rogers, Transportation Coordinator  
311 E. Culver Road  
Knox, IN 46534

Verbal complaints are accepted and transcribed by **Janet Rogers**. To make a verbal complaint, call [574-772-7070] and ask for **Transportation Coordinator**.

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

**COMMUNITY SERVICES OF STARKE COUNTY** has up to **thirty days** to investigate the complaint. If more information is needed to resolve the case, the **COMMUNITY SERVICES OF STARKE COUNTY** 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 **COMMUNITY SERVICES OF STARKE COUNTY's** investigator is not contacted by the complainant or does not receive the additional information within thirty days, **COMMUNITY SERVICES OF STARKE COUNTY** 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

1200 New Jersey Avenue SE  
Washington, DC 20590

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

**COMMUNITY SERVICES OF STARKE COUNTY** maintains a list of active investigations conducted by FTA and entities other than FTA, including lawsuits and complaints naming **COMMUNITY SERVICES OF STARKE COUNTY** 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 **COMMUNITY SERVICES OF STARKE COUNTY** 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**

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

**III. COMMUNITY SERVICES OF STARKE COUNTY'S PUBLIC PARTICIPATION PLAN**

**Key Principles**

**COMMUNITY SERVICES OF STARKE COUNTY's** Public Participation Plan (PPP) has been prepared to ensure that no one is precluded from participating in **COMMUNITY SERVICES OF STARKE COUNTY'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 **COMMUNITY SERVICES OF STARKE COUNTY's** decision making;

- The concerns of all participants involved will be considered in the decision-making process; and,
- **COMMUNITY SERVICES OF STARKE COUNTY** will seek out and facilitate the involvement of those potentially affected.

Through an open public process, **COMMUNITY SERVICES OF STARKE COUNTY** has developed a public participation plan to encourage and guide public involvement efforts and enhance access to **COMMUNITY SERVICES OF STARKE COUNTY'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 **COMMUNITY SERVICES OF**

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.

**STARKE COUNTY** uses to reach its riders.

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

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

### Objectives of the Public Participation Plan

**COMMUNITY SERVICES OF STARKE COUNTY'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 - **COMMUNITY SERVICES OF STARKE COUNTY** will proactively reach out to and engage low income, minority and LEP populations from the **COMMUNITY SERVICES OF STARKE COUNTY** 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 - **COMMUNITY SERVICES OF STARKE COUNTY** 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.

**COMMUNITY SERVICES OF STARKE COUNTY** 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, **COMMUNITY SERVICES OF STARKE COUNTY** will post service change notices on appropriate buses and stops **sixty days** in advance of the change date.

## **IV. COMMUNITY SERVICES OF STARKE COUNTY'S PUBLIC PARTICIPATION PROCESS**

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

COMMUNITY SERVICES OF STARKE COUNTY's PPP includes many new mediums extending beyond the traditional approach which relied on legal notices and intermittent media coverage. While COMMUNITY SERVICES OF STARKE COUNTY maintains these elements to its outreach program along with traditional seat-drop flyers, COMMUNITY SERVICES OF STARKE COUNTY 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, COMMUNITY SERVICES OF STARKE COUNTY's Service Review Committee, detailed later in this program, will review all service change proposals);**
3. Proposals are reviewed by COMMUNITY SERVICES OF STARKE COUNTY's Passenger Advisory Committee (TAC);
4. A Title VI review of the proposal is conducted;
5. If required, authorization from the COMMUNITY SERVICES OF STARKE COUNTY Board of Commissioners 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 COMMUNITY SERVICES OF STARKE COUNTY service area;
7. Bilingual **(English and [Spanish])** public outreach materials and a program are developed;
  1. Outreach in advance of public information sessions is released (using tool-box of mediums listed below);
  2. An Email is transmitted to COMMUNITY SERVICES OF STARKE COUNTY community partners;
  3. Local radio station(s) **[WKVI] interviews may be conducted (if available);**
  4. The public comment period ends;
  5. An COMMUNITY SERVICES OF STARKE COUNTY Board of **TAC (Transportation Advisory Council);**
  6. The final service/fare change date is set;
  7. Outreach is conducted in advance of any service or fare change;
  8. Bilingual system timetable and website updated in advance of the proposed change.

**(Anexo 2) - título VI aviso al público (Spanish)**

El Donatario sección 5310/5311 de aviso al público es el siguiente:

Notificar al público de los derechos bajo título VI

**EL DONATARIO SECCIÓN 5310/5311**

- ✓ La sección 5310/5311 Donatario opera sus programas y servicios sin importar raza, color, nacionalidad de origen según el título VI de la ley de derechos civiles. Cualquier persona que cree que él o ella ha sido agraviado por cualquier práctica discriminatoria ilegal bajo el título VI puede presentar una queja con el Donatario sección 5310/5311.
- ✓ Para más información sobre el programa derechos civiles sección 5310/5311 Donatario y los procedimientos para presentar una queja, póngase en contacto con la comunidad servicios de Starke Condado, (574-772-7070), correo electrónico a: [www.communityservicesofstarkecounty.org](mailto:www.communityservicesofstarkecounty.org). Para obtener más información, visite [www.communityservicesofstarkecounty.org](http://www.communityservicesofstarkecounty.org).
- ✓ Un demandante puede presentar una queja directamente con la administración de tránsito Federal por archivar una queja con la oficina de derechos civiles, atención: Coordinador del programa Título VI, edificio este, 5<sup>th</sup> Floor TCR, 1200 New Jersey Ave. SE Washington, DC, 20590.
- ✓ Si necesita información en otro idioma, en contacto con la comunidad servicios de Starke Condado, (574-772-7070).

El sección 5310/5311 Donatario previo aviso al público se encuentra en las siguientes ubicaciones. (cheque todos que aplican)

X sitio web Agencia [[www.communityservicesofstarkecounty.org](http://www.communityservicesofstarkecounty.org)]

X las zonas públicas de la oficina de la agencia (area común, salas de reuniones públicas, etc.)

X dentro de vehículos

X Rider guías/horarios

Albergues de tránsito y estaciones — no aplicables

Other: \_\_\_\_\_

### **Selection of Meeting Locations**

When determining locations and schedules for public meetings, **COMMUNITY SERVICES OF STARKE COUNTY** 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, television, or newspaper ads as well as podcasts that serve LEP populations;
- Ensure that transportation is available to and from the meeting if requested;
- Provide opportunities for public participation through means other than written communication, such as one-on-one interviews or use of audio or video recording devices to capture oral comments.

### **COMMUNITY SERVICES OF STARKE COUNTY Mediums**

- Print - Newspapers and other periodicals
- Outdoor - Advertising on-board buses (interior and exterior) and in bus shelters
- Website - COMMUNITY SERVICES OF STARKE COUNTY has assembled a comprehensive website with automatic alerts
- Web-Based Feedback - (Report It, Shout It, Suggest It, How Are We Doing, and Tell Us Your Story).
- Social Media - COMMUNITY SERVICES OF STARKE COUNTY has used Facebook, since 2021 to help engage community
- Radio - WKVI (if available and appropriate)
- 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 on proposed service or fare changes for example, mail, email, social media, public meetings and others, all comments are assembled into a single document for presentation to the **COMMUNITY SERVICES OF STARKE COUNTY** 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, **COMMUNITY SERVICES OF STARKE COUNTY** has assembled a listing of stakeholders with whom we regularly communicate through email and direct mail. A complete list of **COMMUNITY SERVICES OF STARKE COUNTY's** community stakeholders can be obtained by contacting **COMMUNITY SERVICES OF STARKE COUNTY**.

### *Stakeholder List*

Any community organization or person can be added to the **COMMUNITY SERVICES OF STARKE COUNTY** stakeholder list and receive regular communications regarding service changes by contacting the **COMMUNITY SERVICES OF STARKE COUNTY** administrative office at [574-772-7070]. Local organizations and businesses can also request that a speaker from **COMMUNITY SERVICES OF STARKE COUNTY** attend their regular meeting at the same number or through the **COMMUNITY SERVICES OF STARKE COUNTY** website [[www.communityservicesofstarkecounty.org](http://www.communityservicesofstarkecounty.org)].

## **V. DECISION MAKING BODIES**

### *Non-Elected Committees and Councils*

At **COMMUNITY SERVICES OF STARKE COUNTY**, decisions regarding policy, service changes, fares, capital programming and facility locations are made by TAC and board of directors. **COMMUNITY SERVICES OF STARKE COUNTY's** Board of Directors is composed of 15 members representing cities and towns of Starke County who are members of **COMMUNITY SERVICES OF STARKE COUNTY**. **COMMUNITY SERVICES OF STARKE COUNTY** also has an internal group known as the TAC. Transportation Advisory Committee (TAC) who hold ongoing meetings to help to guide decisions regarding routes, schedules, and other topics important to the community and our riders. Meetings of the **COMMUNITY SERVICES OF STARKE COUNTY** Board of Directors and the Transportation Advisory Committee are always open to the public, held at Monon, IN via email.

**Transportation Advisory Committee (TAC)**

This committee is open to the public and comprised of passengers representing various bus routes.

At the bimonthly meetings, members discuss all aspects of COMMUNITY SERVICES OF STARKE COUNTY's services from the perspective of the public. This group offers an invaluable service to COMMUNITY SERVICES OF STARKE COUNTY. 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 23 years. Presently there are 5 members.

Body	Caucasian	African American	Hispanic	Asian	Race 4	Race 5
Board of Commissioners	3					
Transportation Advisory Committee	5					



## VII. SUMMARY OF CHANGES

### Service Change Evaluations Since [8/20/2015]

Since COMMUNITY SERVICES OF STARKE COUNTY's 2008 Title VI Plan Submission there have been **no changes** in COMMUNITY SERVICES OF STARKE COUNTY's fare structure. There have been no service changes.

These changes, the associated outreach and Title VI determination and COMMUNITY SERVICES OF STARKE COUNTY Board Approval are available by contacting COMMUNITY SERVICES OF STARKE COUNTY.

### Program Specific Requirements

#### Title VI Monitoring (from [8/20/2015] Title VI Plan)

The results of the ongoing monitoring of service standards as defined in the COMMUNITY SERVICES OF STARKE COUNTY's [8/20/2015] program can be obtained by contacting COMMUNITY SERVICES OF STARKE COUNTY.

#### Subrecipient Compliance

[N/A]

#### Equity Analysis for Facility

N/A

#### Demographic Service Profile

Because COMMUNITY SERVICES OF STARKE COUNTY 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

None

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

COMMUNITY SERVICES OF STARKE COUNTY has not been the subject of any such reviews since its [2019] submission....or

Compliance Review and drug and alcohol Review

### Recent Annual Certifications and Assurances

COMMUNITY SERVICES OF STARKE COUNTY executed its most recent Certifications and Assurances to the FTA in [June 2023] and is in the process of executing | 2023 | certifications and assurances.

**Contact**

For additional information on the **COMMUNITY SERVICES OF STARKE COUNTY** 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:

**Janet Rogers, Transportation Coordinator**  
**574-772-7070**  
**[jrogers@starkecs.com](mailto:jrogers@starkecs.com)**

## **IX. LANGUAGE ASSISTANCE PLAN**

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

In order to ensure meaningful access to programs and activities, **COMMUNITY SERVICES OF STARKE COUNTY** uses the information obtained in a Four Factor Analysis to determine the specific language services that are appropriate. This analysis helps **COMMUNITY SERVICES OF STARKE COUNTY** 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 **COMMUNITY SERVICES OF STARKE COUNTY**;
2. The frequency with which LEP persons come into contact with **COMMUNITY SERVICES OF STARKE COUNTY** services and programs;
3. The nature and importance of **COMMUNITY SERVICES OF STARKE COUNTY**'s services and programs in people's lives; and
4. The resources available to **COMMUNITY SERVICES OF STARKE COUNTY** 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 **COMMUNITY SERVICES OF STARKE COUNTY**'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, **COMMUNITY SERVICES OF STARKE COUNTY** 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 (10/26/21). Data was reviewed by the executive director, transportation program coordinator and board of directors president.

#### **Service Area Overview**

**COMMUNITY SERVICES OF STARKE COUNTY**'s service area encompasses approximately 309 square miles of Starke County and is home to a population speaking more than 3 different languages. Of the total service area population, (23,371), 0 % of residents report speaking English less than very well. The most populous groups in the category are shown below. Of the

remaining populations, those reporting English "less than very well" range from 0 % to 3.03 % of the total service area population.

Speak English "Less than very well"	Population in the Language Group	Percent of Total Population
Spanish	151	0.70%
Other Indo-European	121	0.56%
Chinese	14	0.06%

**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."

**Factor 2 – Frequency of LEP Use**

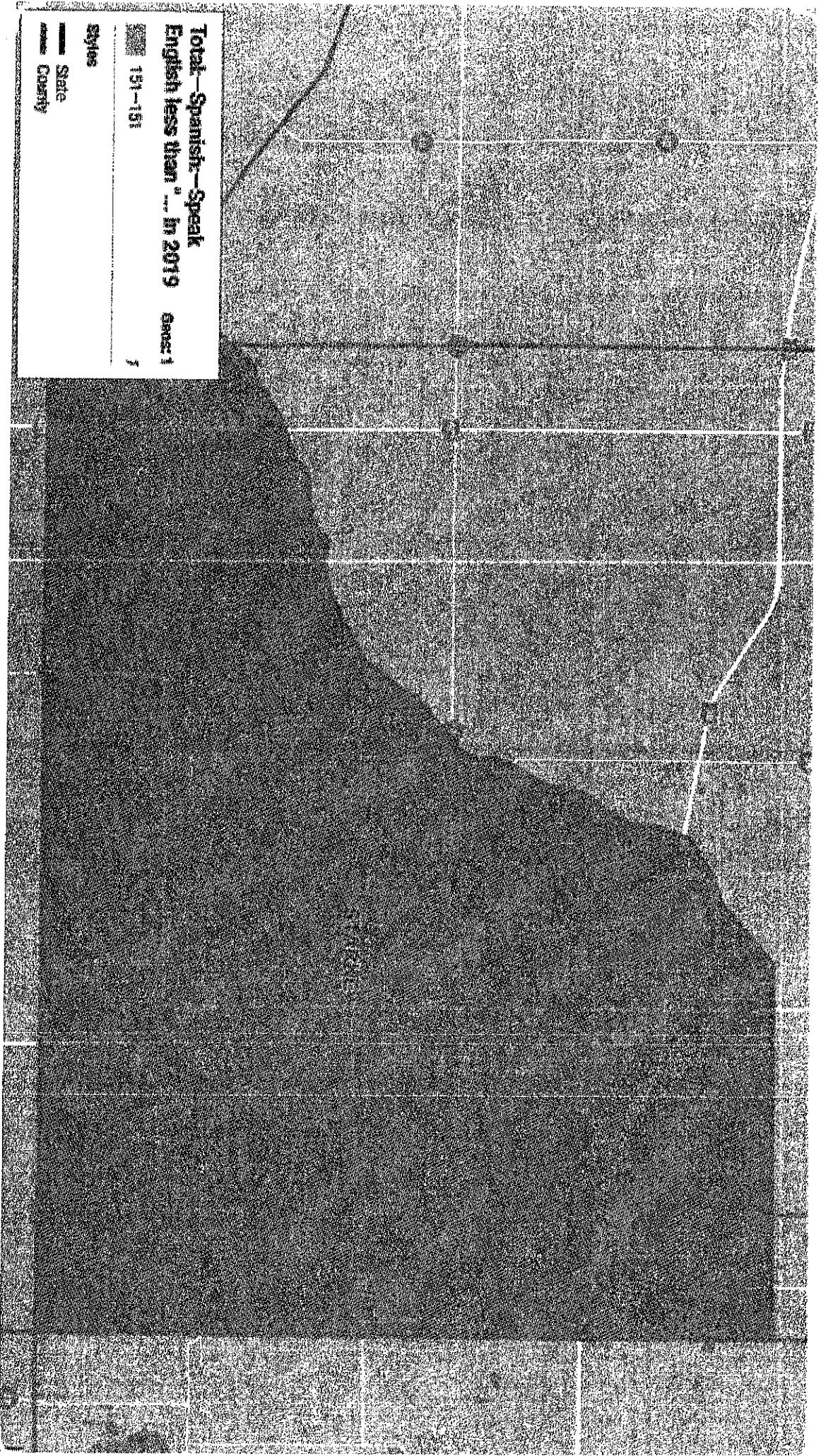
There are many places where **COMMUNITY SERVICES OF STARKE COUNTY** riders and members of the LEP population can come into contact with **COMMUNITY SERVICES OF STARKE COUNTY** services including the use of fixed route and demand response buses, calls to customer service representatives, reservation agents and **COMMUNITY SERVICES OF STARKE COUNTY's** outreach materials. An important part of the development of **COMMUNITY SERVICES OF STARKE COUNTY'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 **COMMUNITY SERVICES OF STARKE COUNTY'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 **COMMUNITY SERVICES OF STARKE COUNTY** buses; and
- Service related posters at **COMMUNITY SERVICES OF STARKE COUNTY's** bus terminal.

**Total—Spanish—Speak  
English less than " ... In 2019**

151-151 **Source: 1**  
7

**Style:**  
State  
County



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

N/A- We do not have Non-English speaking customers.

Method of Interaction	Percent of Responses
Telephone	0%
Face to Face	100%
Email	0%
Fax	0%

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

N/A- We have no Non-English speaking customers.

Frequency of Interaction	Percent of Responses
Often	0%
Sometimes	0%
Rarely	0%
Never	100%

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

N/A- We have no Non-English speaking customers.

Language	Percent of Interactions
English	100%

The survey asked, overall, how effective employees are in communicating with Limited English Proficient **COMMUNITY SERVICES OF STARKE COUNTY** passengers. The results are summarized below.

N/A- We have no Non-English speaking customers.

Effectiveness	Percent of Total Responses
Very Effective	100%
Moderately Effective	0%
Less Effective	0%
Unable to Communicate	0%

### Community Partners

**COMMUNITY SERVICES OF STARKE COUNTY** 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?

<u>Question</u>	<u>Partner Name</u>	<u>Partner Name</u>	<u>Partner Name</u>
Do you encounter non-English speaking/reading people who need your services?	<u>Southeast Trans</u> Yes	<u>Well Trans</u> Yes	<u>Medicare</u> Yes
If so, what are the top three languages that you encounter?	Spanish	Spanish Arabic	Spanish
How do you address language barriers?	Language service	Language service	Language service
Do you find language to be a barrier in preventing you from providing service?	No	No	No

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

In addition to the U.S. Census data, employee survey, and outreach to community partners, COMMUNITY SERVICES OF STARKE COUNTY implemented a survey of its riders. A copy of the survey is attached in Appendix A.

### **Factor 3 - The Importance of COMMUNITY SERVICES OF STARKE COUNTY Service to People's Lives**

Access to the services provided by COMMUNITY SERVICES OF STARKE COUNTY are critical to the lives of many in the service area. Many depend on COMMUNITY SERVICES OF STARKE COUNTY'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 COMMUNITY SERVICES OF STARKE COUNTY which can affect access includes:

**Community Services of Spoke County would like to know about you and how you use the bus!**

- Typically, how often do you ride a CSSC Bus?
  - Few times Monthly
  - Few times Weekly
  - Daily
- Which days do you usually ride the CSSC?
  - Daily
  - Monday
  - Tuesday
  - Wednesday
  - Thursday
  - Friday
  - Saturday
  - Sunday
- What is your main purpose in using the bus for this trip? (Please select one)
  - Work
  - School (Middle or High School)
  - Shopping
  - Social Service
  - Social Visit
  - Doctor or Medical Visit
  - College
  - Other
- About how long will your trip take, including getting to the bus stop, waiting for any transfer bus you may use, riding on the bus, and getting from the bus to your final destination? Minutes: \_\_\_\_\_
- How far did you come to get to the bus stop for this bus?
  - Less than 1 Block
  - 1-2 Blocks
  - 3-4 Blocks
  - 5-6 Blocks
  - More Than 6 Blocks
- What time of day did you begin this trip?
  - 4:00-5:30AM
  - 6:30-9:00AM
  - 9:00-11:00AM
  - 11:00AM-1:00PM
  - 1:00-3:00PM
  - 3:00-5:00PM
  - 5:30-6:30PM
  - 6:30-10:00PM
  - 10:00PM-2:00AM
- How will you pay your fare on this bus today?
  - Cash
  - 31-Day Pass
  - 7-Day Pass
  - Day Pass
  - Reduced Day pass
  - Reduced 31-Day Pass
  - Red/Gray Pass
- Where did you purchase your pass?
  - Bus
  - Ticket Vending Machine
  - Plaza Outlet
  - Other retail location
- Besides your current trip will you go to any other destinations today using a CSSC bus?
  - No
  - 1 Other
  - 2 Other
  - 3 or More Destinations
- Which applies to you, are you presently?
  - Employed for pay outside your home
  - Employed for pay in your home
  - Student
  - Homemaker
  - Retired
  - Unemployed
  - Other
- How many automobiles are in your household?
  - 0
  - 1
  - 2
  - 3 or More
- How many licensed drivers are in your household?
  - 0
  - 1
  - 2
  - 3 or More
- Which is your main mode of transportation for work and non-work trips? (Select One)
 

<ol style="list-style-type: none"> <li>Drive Alone</li> <li>Carpool</li> <li>CSSC bus</li> <li>Bicycle</li> <li>Walk</li> <li>Do not Commute</li> </ol>	<ol style="list-style-type: none"> <li>Drive Alone</li> <li>Carpool</li> <li>CSSC</li> <li>bicycle</li> <li>Walk</li> <li>Do not Commute</li> </ol>
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- How old are you? \_\_\_\_\_ Years old
- What is the zip code at your home? Zip: \_\_\_\_\_
- Gender?
  - Female
  - Male
  - Transgender
  - Other
  - Prefer not to disclose
- How many people (adults and children) live in your house?
  - 1
  - 2
  - 3
  - 4
  - 5
  - 6
  - 7 or more
- What is your household's annual income?
  - Less than \$15,000
  - \$15,000-\$24,999
  - \$25,000-\$34,999
  - \$35,000-\$74,999
  - \$75,000-\$99,999
  - \$100,000-\$149,999
  - \$150,000-\$199,999
  - More than \$200,000
- Do you consider yourself (if more than one group applies to you, please circle all that apply.)
 

<input type="checkbox"/> White	<input type="checkbox"/> African American/Black	<input type="checkbox"/> Hispanic
<input type="checkbox"/> Asian	<input type="checkbox"/> Native American Indian	<input type="checkbox"/> Multiple Race
<input type="checkbox"/> Other		
- In which Country were you born (i.e., USA, China)? \_\_\_\_\_

21. Do you speak or understand English?  
 (a) Very Well (b) Not Well (c) Not At All

How do you rate CSSC service? 1 very bad - 5 Excellent

22. Frequency of service	1	2	3	4	5
23. Cleanliness of the buses	1	2	3	4	5
24. Safety and security at stops	1	2	3	4	5
25. Safety and security on bus	1	2	3	4	5
26. Buses running on time	1	2	3	4	5
27. Time service ends in evening	1	2	3	4	5
28. Distance to stop from home	1	2	3	4	5
29. The price to ride	1	2	3	4	5
30. Convenience of schedules	1	2	3	4	5
31. Driving skills of bus operator	1	2	3	4	5
32. Helpfulness of drivers	1	2	3	4	5
33. Helpfulness of phone staff	1	2	3	4	5
34. Bus routes go where needed	1	2	3	4	5
35. Overall CSSC service	1	2	3	4	5

36. Do you have cell phone access? (a) Yes (b) No  
 Additional Comments below:

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 **COMMUNITY SERVICES OF STARKE COUNTY** 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 COMMUNITY SERVICES OF STARKE COUNTY vehicles.**

The **COMMUNITY SERVICES OF STARKE COUNTY** 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 **COMMUNITY SERVICES OF STARKE COUNTY**.

Any person who wants additional information on **COMMUNITY SERVICES OF STARKE COUNTY**'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 **COMMUNITY SERVICES OF STARKE COUNTY** within 180 days of the date of the alleged discrimination.

To file a complaint contact **COMMUNITY SERVICES OF STARKE COUNTY** at [574-772-7070], [www.comunityservicesofstarkecounty.org] or send a letter to [311 E. Culver Rd., Knox, IN 46534]. 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 **COMMUNITY SERVICES OF STARKE COUNTY Transit** garantiza que ninguna persona, por motivos de raza, color, o origen nacional estén excluida de la participación o negado de los beneficios o ser sujeto de discriminación en respecto a los servicios proveidos de la Autoridad del transporte público.

Cualquier persona que cree que él o ella a título individual o como miembro de una clase específica de personas, ha sido sujeto de discriminación por motivos de raza, color, o origen nacional puede presentar una queja a la compañía **COMMUNITY SERVICES OF STARKE COUNTY** dentro de los 180 días siguientes a la fecha de la supuesta discriminación.

Para presentar una queja al **COMMUNITY SERVICES OF STARKE COUNTY**, llame al [574-772-7070], [www.communityservicesofstarkecounty.org], o escribe una carta y envía a [311 E.

Culver Rd., Knox, IN 46534]. 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**

**COMMUNITY SERVICES OF STARKE COUNTY** has committed resources to improving access to its services and programs for LEP persons.

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

If another language needs to be provided, the agency will do so.

To date, the costs associated with these efforts fit within the **COMMUNITY SERVICES OF STARKE COUNTY's** marketing and outreach budget.

Costs are predominantly associated with translation services and material production.

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

Following the "Four Factor Analysis", **COMMUNITY SERVICES OF STARKE COUNTY** 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 translation services for telephone communications with customer service representatives;
2. Assigning new staff charged with improvement community engagement; and
3. Creating a page with multiple languages for print (system timetable) and web-based posting indicating how **COMMUNITY SERVICES OF STARKE COUNTY** provides language assistance.
4. Use a smart phone with translation application.

Additional recommendations gleaned from the internal staff survey include:

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

**COMMUNITY SERVICES OF STARKE COUNTY** is considering all these items and other methods that become available.

## Oversight

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

The monitoring of the Language Assistance Plan will include:

- ◆ Annual reviews of regional census data for changing patterns of LEP populations;
- ◆ Update the policy every three years;
- ◆ Ongoing collaboration with regional partners;
- ◆ Ongoing review of Google Translate requests at **COMMUNITY SERVICES OF STARKE COUNTY's** website; and
- ◆ Post Event Assessments (PEA)

### **Post-Event Assessments**

Following service changes, fare increases and planning projects, [Transportation Program Coordinator] 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**

**COMMUNITY SERVICES OF STARKE COUNTY** 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. **COMMUNITY SERVICES OF STARKE COUNTY** 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.

Drivers are informed of various bi-lingual forms available in print and on the website.

### Translation of Vital Documents

**COMMUNITY SERVICES OF STARKE COUNTY** 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 on 2/18/2022
- ◆ Service Complaint Forms – Were translated in 2/18/2022
- ◆ These forms are available upon request.