

# **TITLE VI PLAN**

## **CITY OF NEW CASTLE, INDIANA NEW CASTLE TRANSIT APRIL 2022**

Plan Adopted: June 6, 2022

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• Any person or agency with Internet access will be able to access and download the plan from the City of New Castle website. Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail, or in person, and shall be provided a copy of the plan at no cost. LEP individuals may request copies of the plan in translation, which NCTransit will provide, if feasible.	
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## **I. INTRODUCTIONNEW CASTLE TRANSIT'S COMMITMENT TO CIVIL RIGHTS**

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

**City of New Castle Transit (NCTransit)** 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 NCTransit. For more information on NCTransit's civil rights program and the procedures to file a complaint, please contact (765) 529-7605; email [newcastlecoordinator@gmail.com](mailto:newcastlecoordinator@gmail.com); or visit our administrative office at 227 N. Main Street 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 NCTransit programs and services, visit <https://www.cityofnewcastle.net/departments/?structureid=74>. If information is needed in another language, please contact NCTransit at (765)529-8113.

### Discrimination Complaint Procedures

NCTransit 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 NCTransit may file a Title IV complaint by completing and submitting the agency's Title VI Complaint form, available at our administrative offices at 227 N. Main Street, New Castle, Indiana, 47362, or on our website at: [cityofnewcastle.net/departments/?structureid=65](http://cityofnewcastle.net/departments/?structureid=65).

NCTransit 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 NCTransit on the basis of race, color, or national origin you have the right to file a complaint with the **City of New Castle ADA/Title VI Coordinator, FTA's Office of Civil Rights, or Transportation Director Douglas Sloan.**

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

Complete the Complaint Form, and send it to:

ADA/Title VI Coordinator  
227 N. Main St., New Castle, IN 47362  
[newcastlecoordinator@gmail.com](mailto:newcastlecoordinator@gmail.com)

Verbal complaints are accepted and transcribed by the ADA/Title VI Coordinator. To make a verbal complaint, call (765) 529-7605 and ask for Unknown.

# Discrimination Complaint Form

## Title VI and ADA

<b>Section I:</b>		
Name: _____		
Address: _____		
Telephone (Home): _____	Telephone (Work): _____	
Electronic Mail Address: _____		
Accessible Format Requirements?	<input type="checkbox"/> Large Print	<input type="checkbox"/> Audio Tape
	<input type="checkbox"/> TDD	<input type="checkbox"/> Other
<b>Section II:</b>		
Are you filing this complaint on your own behalf?	<input type="checkbox"/> Yes*	<input type="checkbox"/> No
<i>*If you answered "yes" to this question, go to <b>Section III</b>.</i>		
If not, please supply the name and relationship of the person for whom you are complaining.	_____	
Please explain why you have filed for a third party: _____		
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Section III:</b>		
I believe the discrimination I experienced was based on (check all that apply):		
<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.		
<div style="border-bottom: 1px solid black; height: 20px; margin-bottom: 5px;"></div> <div style="border-bottom: 1px solid black; height: 20px; margin-bottom: 5px;"></div> <div style="border-bottom: 1px solid black; height: 20px;"></div>		
<b>Section IV:</b>		
Have you previously filed a Discrimination Complaint with this agency?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

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

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

- (1) 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 issues if necessary.
- (2) Allegations received by fax or e-mail 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.
- (3) 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 NCTransit's investigator is not contacted by the complainant or does not receive the additional information within sixty days, NCTransit 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



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

NCTransit maintains a list of active investigations conducted by FTA and entities other than FTA, including lawsuits and complaints naming NCTransit 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 NCTransit 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)	Date	Summary of Complaint	Status	Action(s) Taken

### **III. NCTransit's Public Participation Plan**

#### **Key Principles**

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

Through an open public process, NCTransit has developed a public participation plan to encourage and guide public involvement efforts and enhance access to NCTransit'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 NCTransit 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 NCTransit'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 - NCTransit 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 - NCTransit 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 NCTransit which are useful, relevant and constructive, contributing to better plans, projects, strategies and decisions.

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

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

NCTransit 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, NCTransit will post service change notices on appropriate buses and stops (60) sixty days in advance of the change date.

#### IV. NCTransit's Public Participation Process

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

NCTransit's PPP includes many mediums extending beyond the traditional approach which relied on legal notices and intermittent media coverage. While NCTransit maintains these elements to its outreach program along with traditional seat-drop flyers, NCTransit 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 New Castle Board of Public Works and Safety;
3. Proposals are reviewed by NCTransit's Transit Advisory Committee ("TAC");
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 NCTransit 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 New Castle 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. NCTransit 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, NCTransit 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.

### **NCTransit Mediums**

- Print – Newspapers and other periodicals
- Outdoor – Advertising on-board buses (interior and exterior) and in bus shelters
- Website – City of New Castle has assembled a comprehensive website
- Web-Based Feedback - (Report It, Shout It, Suggest It, How Are We Doing, and Tell Us Your Story).
- Social Media – NCTransit has used Facebook since 2018 to help engage community
- Radio (if available and appropriate)
- Seat Drops, On-board Flyers – NCTransit 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

### **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 mail, email, social media, public meetings and others, all comments are assembled into a single document for presentation to the NCTransit 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, NCTransit has assembled a listing of stakeholders with whom we regularly communicate through public media. A complete list of NCTransit's community stakeholders can be obtained by contacting NCTransit.

#### **Stakeholder List**

Any community organization or person can be added to the NCTransit stakeholder list and receive regular communications regarding service changes by contacting the NCTransit administrative office at (765) 521-6847. Local organizations and businesses can also request that a speaker from NCTransit attend their regular meeting at the same number or by email to [doug-sloan@cityofnewcastle.net](mailto:doug-sloan@cityofnewcastle.net).

### **V. Decision Making Bodies Non-Elected Committees and Councils**

At NCTransit, decisions regarding policy, service changes, fares, capital programming and facility locations are made by City of New Castle Board of Public Works and Safety. The Board of Public Works and Safety is composed of 3 members representing the City of New Castle. The Transit Advisory Committee (TAC) hold ongoing meetings to help to guide decisions regarding routes, schedules, and other topics important to the community and our riders. Meetings of the City of New Castle Board of Public Works and the Transit Advisory Committee are always open to the public, and are held at City Hall, 227 N. Main Street, New Castle, Indiana, 47362.

#### **Transit Advisory Committee (TAC)**

This committee is open to the public and comprised of passengers representing various bus routes. At the quarterly meetings, members discuss all aspects of NCTransit's services from the perspective of the public. This group offers an invaluable service to NCTransit. Membership is voluntary and it changes from time to time. Presently there are 5 members.

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

## VI. SUMMARY OF CHANGES

### Service Change Evaluations Since 2019

Since NCTTRANSIT's 2008 Title VI Plan Submission there has been **1 change** in NCTTRANSIT's fare structure. There have been 1 service change to convert the fixed route service to deviated route service.

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

### Program Specific Requirements

#### Title VI Monitoring (from the last Title VI Plan)

The results of the ongoing monitoring of service standards as defined in the NCTTRANSIT's the 2019 program can be obtained by contacting **Doug Sloan, Transportation Director**.

#### Demographic Service Profile

Because NCTransit 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

The City of New Castle applies annually for Section 5311, Rural Public Transportation and as needed for Section 5339 Facilities and Capital Equipment grants. The City uses the federal funding to support the NCTTRANSIT.

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

NCTransit has not been the subject of any such reviews since its 2019 submission

### Recent Annual Certifications and Assurances

NCTransit executed its most recent Certifications and Assurances to the FTA in [month, year] and is in the process of executing [2014 or year] certifications and assurances.

## **Contact**

For additional information on the NCTransit 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:

**ADA/Title VI Coordinator**  
**City of New Castle**  
**(765) 529-7605**  
**newcastlecoordinator@gmail.com**

## **IX. LANGUAGE ASSISTANCE PLAN**

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

In order to ensure meaningful access to programs and activities, NCTransit uses the information obtained in a Four Factor Analysis to determine the specific language services that are appropriate. This analysis helps NCTransit 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 NCTransit;
2. The frequency with which LEP persons come into contact with NCTransit services and programs;
3. The nature and importance of NCTransit's services and programs in people's lives; and
4. The resources available to NCTransit 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 NCTransit'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, NCTransit 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 for 2020. Data was reviewed by the City of New Castle Board of Public Works and Safety.

## **Service Area Overview**

NCTransit's service area encompasses approximately 7 square miles of Henry County and is home to 17,396 people; 16,311 of whom are age 5 and over. Language data is available for the latter group of people age 5 and over. Of those 16,311 people, 199 (or 1.2%) speak at least one language other than English. Of those, 110 speak Spanish; 76 an Indo-European language; 0 an Asian Pacific Island language; and 13 speak other languages.

Since access to transit information for as many people as possible is their goal, NCTransit has reviewed the number of those who speak English "less than very well." This is the population with the greatest difficulty accessing information presented in English. The Census data reveals that 39 people in New Castle, or 0.24%, speak English less than very well. Of those 39 people, 19 speak Spanish, and 20 speak an Indo-European language. It is also worth noting that, especially with such a small sets of numbers, the U.S. Census data has margins of error similar to these numbers themselves.<sup>1</sup>

### **Factor 2 - The frequency with which LEP persons come in contact with NCTransit programs, activities or services.**

NCTransit surveyed office staff, dispatchers and bus drivers to determine the frequency with which they have or could have contact with LEP persons. This includes documenting phone inquiries, visits to NCTransit headquarters, surveying NCTransit vehicle operators, the management team, dispatchers, and those who access the NCTransit web site. The office staff and dispatchers have not had any calls from LEP persons requesting an interpreter or any other information to date. The survey of NCTransit drivers indicated that they have had contact with an average of 1400 riders a week (280 a day). No riders were reported to speak English "less than very well".

### **Factor 3 - The nature and importance of programs, activities or services provided by NCTransit to the LEP population.**

There is no large geographic concentration of any type of LEP individuals in the NCTransit service area. The overwhelming majority of the population, 98.8%, speaks only English. As a result, there are few social, service, or professional organizations within the NCTransit service area that focus on outreach to LEP persons. Services provided by NCTransit that are most likely to encounter LEP persons are the fixed bus route NCTransit system which serves the general public and the on demand response. All of the above services could be of particular importance to the LEP population.

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<sup>1</sup> For example, although 19 people were listed as Spanish-speakers who speak English less than very well, the margin of error for that number was  $\pm 22$ . This means there is a chance the true number could be anywhere from 0 to 41.



#### **Factor 4 - The resources available to NCTransit and overall cost to provide LEP assistance.**

NCTransit reviewed its available resources that could be used for providing LEP assistance, which of its documents would be the most valuable to be translated if the need should arise, and taking an inventory of available organizations that could be partnered with for outreach and translation efforts. Since Spanish speaking LEP persons are, by far the largest group that speak English less than “very well” in New Castle, most of NCTransit resources and assistance are directed toward them. The City of New Castle Community Development has access to an interpreter that speaks Spanish that NCTransit can utilize if the need arises.

#### **OUTCOME OF FOUR-FACTOR ANALYSIS AND LANGUAGE ACCESS PLAN**

##### **A. Language Assistance Background**

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to the NCTransit programs and activities. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language. NCTransit will determine when interpretation and/or translation are needed and are reasonable. How the NCTransit staff may identify an LEP person who needs language assistance:

- Examine records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events.
- NCTransit’ staff should become familiar with Language Line Services at <http://www.language.com>. Also, a Translation Service at <http://www.languagemarketplace.com/13-indianapolis-translation-services.html>
- When NCTransit sponsors an event, have a staff person greet participants as they arrive. By informally engaging participants in conversation it is possible to gauge each attendee’s ability to speak and understand English.
- Have “I Speak” Language Identification Cards available at NCTransit events near the registration table. Individuals self-identifying themselves as persons not proficient in English may not be able to be accommodated with translation assistance at the event, but it will assist the sponsoring agency in identifying language assistance needs for future events.
- Have “I Speak” Language Identification Cards available at the customer service desk and easily accessible to lead drivers, supervisors, dispatchers and schedulers as needed.
- Post notice of LEP Plan and the availability of “I Speak” Language Identification Cards on the City of New Castle web site.
- Vehicle operators and other front-line staff, like lead drivers, supervisors, dispatchers and schedulers will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year.

## **B. Language Assistance Measures**

Although there is a very low percentage of LEP individuals in the City of New Castle, that is, persons who speak English less than “very well”, NCTransit will strive to offer the following measures:

1. NCTransit Title VI Policy and the NCTransit staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating in English.
2. There are a few resources available to NCTransit to accommodate LEP persons.
  - i. Language assistance services available on websites.
  - ii. The New Castle High School foreign language department
3. If a client asks for language assistance and NCTransit determines that the client is an LEP person and that language assistance is necessary to provide meaningful access, reasonable efforts will be made to provide free language assistance. If reasonably possible, NCTransit will provide the language assistance in the LEP client’s preferred language. NCTransit has the discretion to determine whether language assistance is needed, and if so, the type of language assistance necessary to provide meaningful access.
4. NCTransit will periodically assess client needs for language assistance based on requests for interpreters and/or translation, as well as the literacy skills of the clients.
5. There are online translation services available online however there is a fee involved for the service.

## **C. Staff Training**

The following training will be provided to NCTransit staff:

- Information on the Title VI Policy and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of the “I Speak” Language Identification Cards.
- Documentation of language assistance requests.
- How to handle a potential Title VI/LEP complaint.

Information will be distributed to all NCTransit staff and posted on the City of New Castle website, [www.cityofnewcastle.net](http://www.cityofnewcastle.net)

## **D. Translation of Documents**

Due to the very small local LEP population, NCTransit does not have a formal outreach procedure in place, as of 2019. Translation resources have been identified and are limited in this region. However, when and if the need arises for LEP outreach, NCTransit will consider the following options:

- When staff prepares a document, or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.

## **E. Formal Interpreters**

When necessary to provide meaningful access for LEP clients, NCTransit will provide qualified interpreters, including any bilingual staff of the City of New Castle, if available. At important stages that require one-on-one contact, written translation and verbal interpretation services will be provided consistent with the four-factor analysis used earlier.

**NCTransit may require a formal interpreter to certify to the following:**

- a. The interpreter understood the matter communicated and rendered a competent interpretation.
- b. The interpreter will maintain private information. Non-public data will not be disclosed without written authorization from the client.
- c. Bilingual City employees, when available, can provide limited assistance to NCTransit staff and LEP clients as part of their regular job duties.

**F. Informal Interpreters**

- Informal interpreters may include the family members, friends, legal guardians, service representatives or advocates of the LEP client. City staff will determine whether it is appropriate to rely on informal interpreters, depending upon the circumstances and subject matter of the communication. However, in many circumstances, informal interpreters, especially children, are not competent to provide quality and accurate interpretations. There may be issues of confidentiality, competency, or conflict of interest.
- An LEP person may use an informal interpreter of his or her own choosing and at their expense, either in place of or as a supplement to the free language assistance offered by the City. If possible, NCTransit/City should accommodate an LEP client's request to use an informal interpreter in place of a formal interpreter.
- If an LEP client prefers an informal interpreter, after NCTransit has offered free interpreter services, the informal interpreter may interpret. In these cases, the client and interpreter should sign a waiver of free interpreter services.
- If an LEP client wants to use his or her own informal interpreter, NCTransit reserves the right to also have a formal interpreter present.

**G. Outside Resources**

- Outside resources may include community volunteers
- Outside resources may be used for interpreting services at public or informal meetings or events if a timely request has been made.

**H. Monitoring**

Monitoring and Updating the LEP Plan- NCTransit will update the LEP as required by U.S. DOT. At a minimum, the plan will be reviewed when it is clear that higher concentrations of LEP individuals are present in the NCTransit service area. Updates will include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether transit system's financial resources are sufficient to fund language assistance resources needed.

- Determine whether NCTransit fully complies with the goals of this LEP Plan.
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals.

#### **I. Dissemination of the NCTransit LEP Plan**

- A link to the NCTransit LEP Plan and the Title VI Plan will be included on the City of New Castle website
- Any person or agency with Internet access will be able to access and download the plan from the City of New Castle website. Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail, or in person, and shall be provided a copy of the plan at no cost. LEP individuals may request copies of the plan in translation, which NCTransit will provide, if feasible.

Questions or comments regarding the LEP Plan may be submitted to NCTransit, 227 North Main Street, New Castle, IN 47362

## **X. SYSTEM-WIDE SERVICE STANDARDS AND SERVICE POLICIES**

NCTransit operates a modified fixed-route service. The Federal Transit Administration requires that all fixed route service providers prepare and submit system-wide service standards and service policies as a part of their Title VI Plan. These standards and policies must address how service is distributed across the transit system, and must ensure that the manner of the distribution affords users access to these assets.

NCTransit has adopted the following system-wide standards and policies to ensure service design and operations practices do not result in discrimination on the basis of race, color, or national origin. Service policies differ from service standards in that they are not necessarily based on a quantitative threshold.

### **Service Standards**

FTA requires that all fixed route transit providers develop quantitative standards for all fixed route modes of operation for the following indicators: vehicle, vehicle headway, on-time performance, and service availability.

### **Vehicle Load**

Vehicle Type	Average Passenger Capacities			
	Seated	Standing	Total	Maximum Load Factor
Sedan	5	0	5	.3
Minivan	7	0	7	.3

Cutaway Bus	18	0	108	1.1
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## Vehicle Headway and Service Availability

Boarding Location(s)	SCHEDULED STOPS	Headway
Hospital, Forest Ridge, and Walmart	(8:30am)*, 9:30am, 10:30am, 11:30am; 12:30pm; 1:30pm, 2:30pm, 3:30pm	60 minutes
Maplewood Terrace Apartments	9:00am, 10:00am, 11:00am, 12:00pm, 1:00pm, 2:00pm, 3:00pm	60 minutes
All routes operate Monday through Friday, from 7:45am to 12:00pm; and 12:30pm to 4:00pm, except on city-observed holidays. *Walmart Stop begins at 9:30am (no 8:30)		

## On-Time Performance

A vehicle is considered on time if it departs a scheduled time point no more than one (1) minute early and no more than five (5) minutes late. NCTransit's on-time performance objective is 90% or greater.

## Service Availability

Because NCTransit is committed to providing the best public transportation possible with a limited number of buses, the entire system operates as a modified fixed-route service, with a demand-response element. That is, in addition to scheduled stops, users may request a ride to and from any specific destination within the service area. This allows NCTransit to meet the needs of all riders, regardless of their proximity to a scheduled stop. To schedule a specific trip, riders simply call dispatch at (765) 529-8113 to schedule their ride 24 hours in advance.

## Service Policies

FTA requires fixed route transit providers to develop a policy for service indicators. NCTransit has prepared the following policies for its transit system.

### Distribution of Transit Amenities

NCTransit has established checkpoint deviation stops throughout the service area. Each checkpoint location is established in an area that is safe for passenger waiting, boarding, and disembarking the vehicles

### Vehicle Assignment

NCTransit uses all cutaway vehicles for service with all vehicles being 2015 or newer.

Bus assignments take into account the operating characteristics of buses which have been matched to the characteristics of the routes.