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AREA 10 AGENCY ON AGING  
RURAL TRANSIT  
TITLE VI LIMITED ENGLISH  
PROFICIENCY (LEP) PLAN

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# **I. INTRODUCTION**

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## **AREA 10 RT'S COMMITMENT TO CIVIL RIGHTS**

This update of AREA 10 RT's Title VI Program has been prepared to ensure that the level and quality of AREA 10 RT's fixed route/demand response services are provided in a nondiscriminatory manner and that the opportunity for full and fair participation is offered to AREA 10 RT's riders and other community members. Additionally, through this program, AREA 10 RT 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.

It is a matter of principle that AREA 10 RT 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 AREA 10 RT'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), AREA 10 RT 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 AREA 10 RT'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 AREA 10 RT riders aware of its commitment to Title VI compliance, and their right to file a civil rights complaint, AREA 10 RT has presented the following information, in both English and Chinese, on its website, program brochure, schedule and posters at transfer booths.

### ***Your Civil Rights***

*AREA 10 RT 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 AREA 10 RT. For more information on AREA 10 RT's civil rights program and the procedures to file a complaint, please contact 812-876-1079; email [lsalyers@area10agency.org](mailto:lsalyers@area10agency.org) or visit our administrative office at 631 W. Edgewood Dr., Ellettsville, IN 47429 from 8:30 am to 4:30 pm. 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 AREA 10 RT programs and services, visit [www.area10agency.org](http://www.area10agency.org). If information is needed in another language, please contact 812-876-1079.*

### **Discrimination Complaint Procedures**

AREA 10 RT 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 AREA 10 RT may file a Title IV complaint by completing and submitting the agency's Consolidated Civil Rights Complaint Form available at our administrative offices or on our website [www.area10agency.org](http://www.area10agency.org)

AREA 10 RT will notify INDOT of all formal complaints within five business days of receiving the complaint.

**See Attachment A for the full form.**

### **The Procedure**

Any person who believes she or he has been discriminated against on the basis of race, color, religion, sex, sexual orientation, gender identity, or national origin by Area 10 Rural Transit may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. Area 10 Rural Transit investigates complaints received no more than 180 days after the alleged incident. Area 10 Rural Transit will process complaints that are complete.

Once the complaint is received, Area 10 Rural Transit will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

Area 10 Rural Transit has 30 days to investigate the complaint. If more information is needed to resolve the case, the city may contact the complainant.

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

If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days, the city can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two (2) letters to the complainant: a closure letter or a letter of finding (LOF).

- ✓ A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.
- ✓ A letter of finding (LOF) summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur.

If the complainant wishes to appeal the decision, she/he has 10 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**

AREA 10 RT maintains a list of active investigations conducted by FTA and entities other than FTA, including lawsuits and complaints naming AREA 10 RT 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 AREA 10 RT in response, or final findings related to the investigation, lawsuit, or complaint.

As of the writing of this program, there are zero complaints pending which allege discrimination on the grounds of race, color, or national origin, or any other form of discrimination.

### **III. AREA 10 RT'S PUBLIC PARTICIPATION PLAN**

#### **Key Principles**

AREA 10 RT's Public Participation Plan (PPP) has been prepared to ensure that no one is precluded from participating in AREA 10 RT'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 AREA 10 RT's decision making;
- The concerns of all participants involved will be considered in the decision-making process; and,
- AREA 10 RT will seek out and facilitate the involvement of those potentially affected.

Through an open public process, AREA 10 RT has developed a public participation plan to encourage and guide public involvement efforts and enhance access to AREA 10 RT'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 AREA 10 RT 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 AREA 10 RT'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 - AREA 10 RT 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 - AREA 10 RT develops and maintains partnerships with communities through the methods described in its public participation plan.

- Quality Input and Participation - The comments received by AREA 10 RT are useful, relevant and constructive, contributing to better plans, projects, strategies and decisions.

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

**AREA 10 RT'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 - AREA 10 RT will reach out to and engage low income, minority and LEP populations from the AREA 10 RT 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 – AREA 10 RT 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.

**AREA 10 RT** 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;
- For minor schedule and service changes not rising to the level of those above, AREA 10 RT will post service change notices on appropriate buses and stops thirty days in advance of the change date.

## **IV. AREA 10 RT'S PUBLIC PARTICIPATION PROCESS**

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

AREA 10 RT's PPP includes many mediums extending beyond the traditional approach which relied on legal notices and intermittent media coverage. While AREA 10 RT maintains these elements to its outreach program along with traditional seat-drop flyers, AREA 10 RT 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. Proposals are reviewed by AREA 10 RT's Board of Directors;
3. A Title VI review of the proposal is conducted;
4. If required, authorization from the AREA 10 RT Monroe County Board of Commissioners is sought to proceed to a public comment period;
5. Public outreach venues, dates and times are determined with consideration of the proposed changes and their impact on specific locations/populations within the AREA 10 RT service area;
6. Bilingual (English and Chinese) public outreach materials and a program are developed;
7. Outreach in advance of public information sessions is released may include:
  1. An Email is transmitted to AREA 10 RT community partners;
  2. Local radio station(s) PSAs
  3. The public comment period ends;
  4. An AREA 10 RT Board of Directors meeting;
  5. The final service/fare change date is set;
  6. Outreach is conducted in advance of any service or fare change;
  7. Bilingual system timetable and website updated in advance of the proposed change.

## **Selection of Meeting Locations**

When determining locations and schedules for public meetings, AREA 10 RT will:

- Schedule meetings at times and locations that are convenient and accessible for minority and LEP communities;
- Employ different meeting sizes and formats including virtual and 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.

### **AREA 10 RT Mediums**

- Print – Newspapers and other periodicals
- Outdoor – Advertising on-board buses
- Website – AREA 10 RT has assembled a comprehensive website
- Web-Based Feedback
- Social Media – AREA 10 RT has used Facebook since 2009 to help engage community
- Email – AREA 10 RT has developed a quarterly email which now over 1,800 readers
- Radio
- Seat Drops, On-board Flyers – AREA 10 RT regularly uses seat drops and flyers to provide riders with details of service changes and schedules of public meetings and hearings.
- Direct Email or Mail to Community Partners
- Public Information Sessions
- Public Hearings
- Legal Notices

### **Addressing Comments**

#### ***The Incorporation of Public Comments into Decisions***

All comments received through the public participation plan are given careful, thoughtful consideration. Because there are a number of different ways riders or members of the community can comment on proposed service or fare changes, all comments are assembled into a single document for presentation to the AREA 10 RT 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, AREA 10 RT has assembled a listing of stakeholders with whom we regularly communicate through email and direct mail. A complete list of AREA 10 RT's community stakeholders can be obtained by contacting AREA 10 RT.

**Stakeholder List**

Any community organization or person can be added to the **AREA 10 RT** stakeholder list and receive regular communications regarding service changes by contacting the **AREA 10 RT** administrative office at 812-876-1079 or email [lsalyers@area10agency.org](mailto:lsalyers@area10agency.org). Local organizations and businesses can also request that a speaker from **AREA 10 RT** attend their regular meeting at the same number and email.

**V. DECISION MAKING BODIES**

**Non-Elected Committees and Councils**

At AREA 10 RT, decisions regarding policy, service changes, fares, capital programming and facility locations are made by Area 10's Board of Directors. AREA 10 RT's Board of Directors is composed of 11 members representing Monroe and Owen counties. AREA 10 RT also participates in the Bloomington Metropolitan Policy Organization Transportation Assistance Committee (TAC). Meetings of the AREA 10 RT Board of Directors are held the 4<sup>th</sup> Wednesday at 3:30 pm and the TAC are the 4<sup>th</sup> Wednesdays at 10 am.

<b>Body</b>	<b>Caucasian</b>	<b>African American</b>	<b>Hispanic</b>	<b>Asian</b>	<b>Native American</b>
<b>Board of Directors</b>	91%	9%	0%	0%	0%
<b>TAC</b>	100%	0%	0%	0%	0%

## **VI. SUMMARY OF CHANGES**

### **Service Change Evaluations Since 2016**

Since AREA 10 RT's 2016 Title VI Plan Submission there have been no changes in AREA 10 RT's fare structure. There have been one service changes.

These changes, the associated outreach and Title VI determination and AREA 10 RT Board Approval are available by contacting AREA 10 RT.

### **Program Specific Requirements**

#### **Title VI Monitoring** (from 2016 Title VI Plan)

The results of the ongoing monitoring of service standards as defined in the AREA 10 RT's 2016 program can be obtained by contacting AREA 10 RT.

#### **Demographic Service Profile**

Because AREA 10 RT 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**

Area 10 RT has one pending application for 5311 Program Operating CY2022.

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

AREA 10 RT has not been the subject of any such reviews.

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

AREA 10 RT executed its most recent Certifications and Assurances to the FTA in May 2021 and is in the process of executing 2021 certifications and assurances.

### **Contact**

For additional information on the AREA 10 RT 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:

812-876-1079, Lisa Salyers, RT Asst. Manager, lsalyers@area10agency.org

## **IX. LANGUAGE ASSISTANCE PLAN**

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

In order to ensure meaningful access to programs and activities, AREA 10 RT uses the information obtained in a Four Factor Analysis to determine the specific language services that are appropriate. This analysis helps AREA 10 RT 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 AREA 10 RT;
2. The frequency with which LEP persons come into contact with AREA 10 RT services and programs;
3. The nature and importance of AREA 10 RT's services and programs in people's lives; and
4. The resources available to AREA 10 RT 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 AREA 10 RT'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, AREA 10 RT 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 2019 ACS 5 year Estimate Tables Data was reviewed by AREA 10 RT's management in its entirety.

### **Service Area Overview**

AREA 10 RT's service area encompasses Monroe, Owen, Lawrence, and Putnam counties. According to the 2019 five year estimate, Monroe County is the only county with a population that meets the LEP Safe Harbor Threshold of 5% or 1,000 individuals, whichever is less, of the population. Of the service area population, 140,043, 3.74% (or 5,235) of residents report speaking English less than very well. The most populous groups in the category are shown below.

<b>Speak English “Less than very well”</b>	<b>Population in the Language Group</b>	<b>Percent of Total Population</b>
Asian and Pacific Island	3,618	2.58%
Spanish	674	0.48%
Other Indo-European	636	0.45%

**The Locations of the LEP Community**

There was no census tract data available for our service area on languages spoken at home other than English. The data is reflective of Monroe County wide population.

**Factor 2 – Frequency of LEP Use**

There are many places where AREA 10 RT riders and members of the LEP population can come into contact with AREA 10 RT services including the use of demand response buses, calls to dispatchers, and AREA 10 RT’s outreach materials. An important part of the development of AREA 10 RT’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 AREA 10 RT’s staff;
- Bus pass sales;
- Printed outreach materials;
- Web-based outreach materials;
- Public meetings; and
- Local news media (print and radio);

AREA 10 RT distributed a language survey to its employees. The objective of the survey was to evaluate the needs of AREA 10 RT customers who are not able to communicate in English. The first question asked, In What Way(s) Do You Interact with AREA 10 RT riders? The chart below illustrates the results.

<b>Method of Interaction</b>	<b>Percent of Responses</b>
Telephone	44%
Face to Face	47%
Email	9%
Fax	0%

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

<b>Frequency of Interaction</b>	<b>Percent of Responses</b>
Often	6%
Sometimes	50%

Rarely	13%
Never	31%

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

Frequency of LEP rider interactions	Percent of Interactions
Often	6%
Sometimes	13%
Rarely	50%
Never	31%

The survey asked, overall, how effective employees are in communicating with Limited English Proficient AREA 10 RT passengers. The results are summarized below.

Effectiveness	Percent of Total Responses
Very Effective	6%
Moderately Effective	50%
Less Effective	13%
Unable to Communicate	6%
No Answer	25%

### Consulting Directly with the LEP Population

In addition to the U.S. Census data and employee surveys, AREA 10 RT implemented a survey of its riders. A copy of the survey is attached in Appendix B.

Primary Language Spoken at Home	Percentage
English	97%
Sign Language	3%

Ability to speak English, if not primary	Percentage
Very Well	No replies
Less than Very Well	No replies

### **Factor 3 – The Importance of AREA 10 RT Service to People’s Lives**

Access to the services provided by AREA 10 RT are critical to the lives of many in the service area. Many depend on AREA 10 RT’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 AREA 10 RT 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<sup>31</sup>
- Outreach related to opportunity for public comments
- What to do in an emergency (where to look for service change announcements)

**The following notice is posted on all AREA 10 RT vehicles.**

The AREA 10 RT 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 AREA 10 RT.

Any person who wants additional information on AREA 10 RT'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 AREA 10 RT within 180 days of the date of the alleged discrimination.

To file a complaint contact AREA 10 RT at 812-876-1079, [www.area10agency.org](http://www.area10agency.org) or send a letter to 631 W. Edgewood Dr., Ellettsville, IN 47429. 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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AREA 10 RT 确保任何人不得因种族、肤色或国籍而被排除在参与 AREA 10 提供的公共交通服务相关的参与或被剥夺福利或受到歧视 转发。任何想要了解有关 AREA 10 RT 的非歧视义务的更多信息或认为他或她个人或作为任何特定类别人士的成员受到基于种族、肤色或国籍的歧视的任何人都可以提出投诉 在涉嫌歧视之日起 180 天内向 AREA 10 RT 提供服务。要提出投诉，请致电 812-876-1079 联系 AREA 10 RT，[www.area10agency.org](http://www.area10agency.org) 或致函 631 W. Edgewood Dr., Ellettsville, IN 47429。也可以直接向 FTA 办公室提出投诉 民权 · 1200 New Jersey Avenue SE, 华盛顿特区 20590。

AREA 10 RT quèbǎo rènghé rén bùdé yīn zhǒngzú, fūsè huò guójí ér bèi páichú zài cānyù AREA 10 tígōng de gōnggòng jiāotōng fúwù xiāngguān de cānyù huò bèi bōduó fúli huò shòudào qíshì zhuǎnfā. Rènghé xiǎng yào liǎojiě yǒuguān AREA 10 RT de fēi qíshì yìwù de gèng duō xìnxī huò rènwéi tā huò tā gèrén huò zuòwéi rènghé tèdìng lèibíe rénrshì dì chéngyuán shòudào jīyú zhǒngzú, fūsè huò guójí de qíshì de rènghé rén dōu kěyǐ tíchū tóusù zài shèxián

qíshì zhī rì qǐ 180 tiānnèi xiàng AREA 10 RT tígōng fúwù. Yào tíchū tóusù, qǐng zhìdiàn 812-876-1079 liánxì AREA 10 RT, www.Area10agency.Org huò zhì hán 631 W. Edgewood Dr., Ellettsville, IN 47429. Yě kěyǐ zhíjiē xiàng FTA bàngōngshì tíchū tóusù mínquán, 1200 New Jersey Avenue SE, huáshèngdùn tèqū 20590.

#### **Factor 4 – Resources and Costs for LEP Outreach**

Even though Area 10 RT does not have a separate budget for LEP outreach, we have worked to implement low cost methods of reaching LEP persons. AREA 10 RT has committed resources to improving access to its services and programs for LEP persons. Today, bilingual information (English/Chinese) is distributed in an extensive number of mediums including the following:

- ◆ A complete bilingual English/Chinese system brochure
- ◆ A complete bilingual English/Chinese Rider’s Guide to demand response services
- ◆ Use of language translation service to community with riders who speak other languages, if needed
- ◆ Bilingual English/Chinese on-board signage

Costs are predominantly associated with translation services and material production.

#### **Outcomes**

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

Following the “Four Factor Analysis”, AREA 10 RT concluded that, while there is currently extensive outreach and materials for the Chinese speaking LEP population of the service area, additional services would assist other LEP populations regardless of the total population in the region. Specifically, we will work to add GTranslate to the Area 10 RT website WordPress platform with a target time of February 2022.

AREA 10 RT is considering 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 AREA 10 RT’s website; and
- ◆ Post Event Assessments (PEA)

### **Post-Event Assessments**

Following service changes, fare increases and planning projects, Area 10 RT management 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**

AREA 10 RT 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. AREA 10 RT also conducts training for office staff on how to use translation applications.

### **Translation of Vital Documents**

AREA 10 RT has translated many vital documents into Chinese 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 Chinese in September 2021
- ◆ On-board notices – Translated into Chinese since 2016
- ◆ Notification of free language services – New print and web-based content was completed in 2008
- ◆ Maps and schedules, rider information, news and event announcements are all translated into Chinese and available by request
- ◆ Service Complaint Forms – Chinese translated in September 2021



## Consolidated Civil Rights Complaint Form

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**Area 10 Agency on Aging** is responsible for ensuring proper implementation of several civil rights laws and programs, including Title VI of the Civil Rights Act of 1964, the Americans with Disabilities Act of 1990 (ADA), the Disadvantaged Business Enterprise (DBE) program, and the External Equal Employment Opportunity (EEO) program.

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

Please mail or submit your completed form to:

**Area 10 Agency on Aging**  
**Attn: Lisa Salyers**  
**631 W. Edgewood Dr.**  
**Ellettsville, IN 47429**

If you have questions about how to prepare a complaint, you may contact us at 1-812-876-3383. More information about transit-related civil rights requirements may be found on the FTA's website at [www.fta.dot.gov](http://www.fta.dot.gov).

**Note:** Apart from the form, *on separate pages*, please describe your complaint. You should include specific details such as names, dates, times, route numbers,

**Important:** We cannot accept your complaint without a signature, so please sign on the last page of the form after printing out.

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### SECTION I

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

- Race / Color / National Origin
- Disability
- Other (specify)

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

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

**SECTION II**

Name:

Street Address:

City:

State:

Zip Code:

Telephone Numbers:

Home:

Cell:

E-Mail Address:

Accessible format requirements:

Large Print

Not Applicable

Other

**SECTION III**

Are you filing this complaint on your own behalf?

Yes  No

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

If not, please supply the name and relationship of the person for whom you are complaining:

Please explain why you have filed for a third party:

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party:

Yes  No

**SECTION IV**

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

Yes  No

If yes, what was the date?

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

Transit Provider

Department of Transportation

Department of Justice

Equal Employment Opportunity Commission

Other

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

Have you filed a lawsuit regarding this complaint?

Yes

No

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

## SECTION V

Name of public transit provider complaint is against:

Contact person

Title

Telephone number

## SECTION VI

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

No

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

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

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

Attachment B

**Rural Transit Rider Survey – Limited English Proficiency Populations Served**

To help Area 10 Rural Transit evaluate our effectiveness in meeting the needs of our riders who may not be able to communicate in English, we're asking all RT riders to complete this brief survey.

What is your primary language spoken at home?

- English
- Chinese
- Spanish
- Korean
- Other, list: \_\_\_\_\_

If your primary language spoken is NOT English, how do you describe your ability to speak English? (choose one)

- Very Well
- Less than Very Well

Do you have any suggestions for how to help limited English proficient riders use our services?

农村公交乘客调查——服务的英语水平有限的人群

为了帮助 Area 10 Rural Transit

评估我们在满足可能无法用英语交流的乘客的需求方面的有效性，我们要求所有 RT 乘客完成这项简短的调查。

您在家的主要语言是什么？

- 英语
- 中国人
- 西班牙语
- 韩国人
- 其他，清单：\_\_\_\_\_

如果您的主要语言不是英语，您如何描述您说英语的能力？（选一个）

- 很好
- 不太好

您对如何帮助英语能力有限的乘客使用我们的服务有什么建议吗？

Attachment B

Encuesta para usuarios de transporte público rural - Poblaciones con dominio limitado del inglés atendidas

Para ayudar a Area 10 Rural Transit a evaluar nuestra eficacia para satisfacer las necesidades de nuestros pasajeros que quizás no puedan comunicarse en inglés, les pedimos a todos los pasajeros de RT que completen esta breve encuesta.

¿Cuál es su idioma principal que se habla en casa?

o inglés

o chino

o español

o coreano

o Otro, enumere: \_\_\_\_\_

Si su idioma principal que habla NO es el inglés, ¿cómo describe su capacidad para hablar inglés?  
(elige uno)

o muy bien

o Menos que muy bien

¿Tiene alguna sugerencia sobre cómo ayudar a los pasajeros con dominio limitado del inglés a utilizar nuestros servicios?