

Living Well in Wabash County CoA, Inc. Wabash County Public Transportation

TITLE VI POLICY

Adopted February 16, 2022, by
Living Well in Wabash County CoA Board of Directors
Updated December 2024



WINCHESTER
Senior Center

WABASH COUNTY
Transportation

LIVING WELL
Downtown

COMMUNITY
Cupboard



**LIVING WELL IN WABASH COUNTY CoA, Inc.
WABASH COUNTY PUBLIC TRANSPORTATION
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I. INTRODUCTION

LIVING WELL IN WABASH COUNTY COA, INC. WABASH COUNTY PUBLIC TRANSPORTATION COMMITMENT TO CIVIL RIGHTS

This update of **Living Well in Wabash County CoA** Title VI Program has been prepared to ensure that the level and quality of WCPT's point deviation route and demand response services are provided in a nondiscriminatory manner and that the opportunity for full and fair participation is offered to **Living Well in Wabash County CoA's** riders and other community members. Additionally, through this program, WCPT 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 WCPT 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 **Living Well in Wabash County CoA's** services based on 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), WCPT 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 Living Well in Wabash County WCPT'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 benefiting a community, 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 **Living Well in Wabash County CoA** riders aware of its commitment to Title VI compliance, and their right to file a civil rights complaint, **Living Well in Wabash County CoA** has presented the following information, in English and Spanish on its **rider guide**.

Your Civil Rights

Living Well in Wabash County CoA *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 Living Well in Wabash County CoA. For more information on Living Well in Wabash County CoA civil rights program and the procedures to file a complaint, please contact (260) 563-4475; email dispatch@livingwellinwabashcounty.org or info@livingwellinwabashcounty.org; or visit our administrative office at 239 Bond Street, Wabash, Indiana from 8:00 am to 5:00 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 Living Well in Wabash County CoA programs and services, visit www.livingwellinwabashcounty.org. If information is needed in another language, please contact at (260) 563-7536.*

PROCEDURE TO FILE A CIVIL RIGHTS COMPLAINT

Living Well in Wabash County CoA has established a process for riders to file a complaint under Title VI. Any person who believes they have received discriminatory treatment based on race, color, or national origin by the **Living Well in Wabash County CoA** based on race, color, or national origin has the right to file a complaint by completing and submitting the agency's Title VI Complaint form available at our administrative offices or on our website: www.livingwellinwabashcounty.org.

Living Well in Wabash County CoA will notify INDOT of all formal complaints within five business days of receiving the complaint. Complaint forms are available online.

The Procedure

If you believe that you have received discriminatory treatment by the Living Well in Wabash County CoA on the basis of race, color, or national origin you have the right to file a complaint with the **Living Well in Wabash County CoA CEO**.

To File a Complaint

Complete the Complaint Form, and send it to:

Beverly Ferry, Chief Executive Officer
Living Well in Wabash County CoA
239 Bond Street
Wabash, In 46992

Verbal complaints are accepted and transcribed by Business Manager to make a verbal complaint, call (239)339-7611 and ask for Vicki Knott, Business Manager.

Living Well in Wabash County CoA investigates complaints received no more than 180 days after the alleged incident. **Living Well in Wabash County CoA** will process complaints that are complete. Once the complaint is received, **Living Well in Wabash County CoA** will review it and the complainant will receive an acknowledgement letter informing them whether the complaint will be investigated by **Living Well in Wabash County CoA**.

Living Well in Wabash County CoA has up to thirty days to investigate the complaint. If more information is needed to resolve the case, **Living Well in Wabash County CoA** 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 **Living Well in Wabash County CoA** investigator is not contacted by the complainant or does not receive the additional Information within thirty days, **Living Well in Wabash County CoA** can administratively close the case. The 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, they have 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

Living Well in Wabash County CoA maintains a list of active investigations conducted by FTA and entities other than FTA, including lawsuits and complaints naming **Living Well in Wabash County CoA** that allege discrimination based on 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 **Living Well in Wabash County CoA** in response, or final findings related to the investigation, lawsuit, or complaint.

As of the writing of this program, there are no 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

(See yearly complaint activity form).

**III. LIVING WELL IN WABASH COUNTY COA
PUBLIC PARTICIPATION PLAN**

Key Principles

Living Well in Wabash County CoA Public Participation Plan (PPP) is prepared to ensure that no one is precluded from participating in the **Living Well in Wabash County CoA** 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 the **Living Well in Wabash County CoA** decision making.
- The concerns of all participants involved will be considered in the decision-making process; and **Living Well in Wabash County CoA** will seek out and facilitate the involvement of those potentially affected.

Through an open public process, **Living Well in Wabash County CoA** has developed a public participation plan to encourage and guide public involvement efforts and enhance access to the **Living Well in Wabash County CoA** 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 **Living Well in Wabash County CoA** 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 (PPP)

The overarching goals of the **Living Well in Wabash County CoA** 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 - **Living Well in Wabash County CoA** 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 - **Living Well in Wabash County CoA** develops and maintains partnerships with communities through the methods described in its public participation plan.
- Quality Input and Participation - Those comments received by **Living Well in Wabash County CoA** are useful, relevant and constructive, contributing to better plans, projects, strategies and decisions.

Objectives of the Public Participation Plan

Living Well in Wabash County CoA 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 - **Living Well in Wabash County CoA** will proactively reach out to and engage low income, minority and LEP populations from the **Living Well in Wabash County CoA** 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 – **Living Well in Wabash County CoA** 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.

Living Well in Wabash County CoA 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 payment of fare is being considered.
- Advance reservation policy is reduced or increased.
- The 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 the 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, WCPT will post service change notices on appropriate buses and ads in local weekly paper sixty days in advance of the change date.

IV. LIVING WELL IN WABASH COUNTY COA'S PUBLIC PARTICIPATION PROCESS

Outreach Efforts – Alerting Riders and Encouraging Engagement

Living Well in Wabash County CoA PPP includes many new mediums extending beyond the traditional approach which relied on legal notices and intermittent media coverage. While **Living Well in Wabash County CoA** maintains these elements to its outreach program along with traditional bus flyers, **Living Well in Wabash County CoA** 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 because of public comment.
2. An internal review by the appropriate committees is conducted.
3. Proposals are reviewed by the LWVCOA Board of Directors.
4. A Title VI review of the proposal is conducted.

5. If required, authorization from the **Wabash 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 **Living Well in Wabash County CoA** service area.
7. Bilingual (English and other languages as necessary) public outreach materials and a program are developed.
8. Outreach In advance of public information sessions is released (using toolbox of mediums listed below):
 1. An Email is transmitted to **Living Well in Wabash County CoA** community partners and passengers with email.
 2. Local radio station interviews and news releases.
 3. The public comment period ends.
 4. The Living Well in Wabash County CoA Board of Directors reviews a summary package detailing the outcome of the public participation process along with staff recommendations.
 5. The final service/fare change date is set.
 6. Outreach is conducted in advance of any service or fare change.
 7. Website and other materials are updated in advance of the proposed change.

Selection of Meeting Locations

When determining locations and schedules for public meetings **Living Well in Wabash County CoA** 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 mi
- Consider radio, television, or newspaper ads as well as podcasts that serve LEP populations minority and/or LEP communities.
- 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.

Living Well in Wabash County CoA Mediums

- Print – Newspapers and agency newsletter.
- Website – Living Well in Wabash County CoA, Inc. website with pages for WCPT.
- Social media –Living Well in Wabash County CoA and WCPT each have a Facebook page to engage community
- Radio on local stations WKUZ and 105.9 the Bash.
- Public Information Sessions

- Public Hearings and legal notices as required.

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 several ways riders or members of the community can comment on proposed service or fare changes (**mail, email, social media, public meetings and others**), all comments are assembled into a single document for presentation to the Living Well in Wabash County CoA, 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 several 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, **Living Well in Wabash County CoA** has assembled a listing of stakeholders with whom we regularly communicate through email and direct mail. A complete list of **Living Well in Wabash County CoA’s** community stakeholders can be obtained by contacting **Living Well in Wabash County CoA**.

Stakeholder List

Any community organization or person can be added to the **LIVING WELL IN WABASH COUNTY CoA, Inc.** stakeholder list and receive regular communications regarding service changes by contacting the **LIVING WELL IN WABASH COUNTY CoA, Inc.** administrative office at **(260) 563-4475**. Local organizations and businesses can also request that a speaker from **LIVING WELL IN WABASH COUNTY CoA, Inc.** attend their regular meeting at the same number or through the **LIVING WELL IN WABASH COUNTY CoA, Inc.** website: www.livingwellinwabashcounty.org.

V. DECISION MAKING BODIES

Non-Elected Committees and Councils

At **Living Well in Wabash County CoA**, decisions regarding policy, service changes, fares, capital programming and facility locations are made in junction by with the Wabash County Commissioners (as necessary and the **Living Well in Wabash County CoA** Board of Directors is composed of 8 to 12 members, representing cities and towns within Wabash County. **Living Well in Wabash County CoA** also has an internal/external group known as the Transportation Advisory Committee (TAC). The TAC holds quarterly meetings to help guide decisions regarding routes, schedules, needs in the community, coordinated training opportunities, Medicaid discussions, and other topics important to the community and our riders. Anyone Interested in joining the TAC should contact either the CEO or transportation coordinator of Living Well in Wabash County CoA. The meetings are held on the fourth Wednesday of the first month of each quarter at 10:00 am Living Well Downtown, 35 East Market Streety, Wabash, Indiana. Currently meetings are being held virtually via Zoom.

Body	Caucasian	African American	Hispanic	Asian	Race 4	Race 5
Board of Commissioners	3					
Transit Advisory Committee	14					
Living Well in Wabash County CoA, Inc. Board of Directors	8					

VI. SERVICE STANDARDS AND POLICIES

Living Well in Wabash County CoA operates demand response public transportation based upon first come first served by reservation and introduced a Point Deviation Route, the Green Line in 2019, but it was discontinued due to COVID -19. Currently there are plans to reinstate the Green Line and to introduce a Connector Line with public input and when there are enough drivers to operate it consistently, Monday through Friday.

As we relaunch the service these service standards and policies will include:

- Vehicle Load – When fully implemented, there will be 2 vehicles involved. Currently, one route is on hold (not operating – due to COVID and the resulting shortage of drivers) and the second route has not been implemented.
- Headways (Frequencies) – We do not have two vehicles going in the same direction unless you consider demand response. when in full operation there will be 2 separate routes. One is a loop in Wabash and the other will connect North Manchester and Wabash. The routes will probably intersect at Walmart on the north side of the Green Line Route. Demand response will continue to provide transportation to those areas of the community and count. Headway is something which needs further planning prior to the relaunch of the Green Line.

- **On-time Performance (Schedule Adherence).** We operated the line for less than a year prior to COVID. To the best of my knowledge, we were on time. We had time in between stops for deviations. We plan to tweak it based on our experience from the initial launch. Nothing other than anecdotal observation was tracked for on-time performance and measures to ensure schedule adherence because the system was not connected to our scheduling software. To date we have not implemented Shah Software® because we are trying to capture the rider history on RouteMatch® before we separate.
- **Service Availability** –The route connected government-subsidized housing, shopping, and medical offices based upon a study we conducted with NRTAP I 2016. Both demand response and point deviation services operate Monday through Friday.
- **Vehicle Assignment Policy** – This was a service expansion. We got two buses to accommodate the additional service.
 - The vehicles used in the point deviation routes will be in equitable condition with the vehicles used for the demand response system. Every attempt is to be made to assure that both modes of transportation are in excellent shape. One is not to be favored over another. The vehicle needs of both modes of transportation service will be evaluated annually.
- **Transit Amenity Policy** – We have 9 unmarked bus stops and plan to add two more. We do not have any shelters or benches. We have bus stop signs to put up when we return the service.
 - Living Well in Wabash County CoA is responsible for maintaining the condition of the signage and any future benches. Ongoing monitoring is required to assure the stops are in good condition.

We held a meeting at the Church of the Brethren on Bond Street in Wabash with senior riders to discuss the new route, answering questions on how the current demand response service would be impacted. The structure of the first route is based upon current ridership patterns and public survey conducted. There were no internal policies and standards or system for updating these policies and standards. We will hold publicly advertised meetings in both Wabash and North Manchester before launching the routes.

Vehicle Load

Vehicle load for each mode: Generally expressed as the ratio of passengers to the number of seats on a vehicle, relative to the vehicle’s maximum load point. For example, on a 40-seat bus, a vehicle load of 1.3 means all seats are filled and there are approximately 12 standees. Transit providers can specify vehicle loads for peak vs. off-peak times, and for different modes of transit.

Vehicle load is expressed as the ratio of passengers to the total number of seats on a vehicle.

Vehicle Type	Seated Capacity	Standing Capacity	Total Capacity	Average Load	Maximum Load
Green Line	12	0	12	3	5
Future Connector Line	12	0	12	0	0

Vehicle Headway (Frequency)

Vehicle headway is the amount of time between two buses traveling in the same direction on a given route. **Living Well in Wabash County CoA** buses are scheduled with a variety of frequencies based generally on demand. Routes are scheduled to minimize the amount of time passengers must wait for return trip to their destination. **Living Well in Wabash County CoA** will also consider more frequent (20-min.) service where ridership levels warrant, and funding levels permit and less frequent services where demand dictates.

Service/Mins	Weekday Peak	Weekday Off-Peak	Saturday Closed	Saturday Closed	Sunday Closed	Sunday Closed
Green Route within Wabash	1.5 hour to an hour by same bus; TBA 45 minutes for some stops and 1.5 hours for other stops	Same				
Connector between Wabash and North Manchester	Hourly is Proposed by same bus; TBA	Same				

On-Time Performance

On-time performance for each mode: A measure of runs completed as scheduled.

Among the most important service standards for riders is on-time performance or adherence to published schedules.

- A vehicle is considered on time if it departs a scheduled time point no more than two minutes early and no more than 5 minutes late.
- **Living Well in Wabash County CoA** on-time performance objective will be 90%.

Service Availability – Access to the Bus Stop: **Service availability for each mode: A general measure of the distribution of routes within an agency’s service area.**

Living Well in Wabash County CoA operates both demand response and point deviated fixed route(s) stops based upon our study done with National RTAP with a contract with RLS and Associates.

Considerations in planning bus stops:

- Poverty
- Clusters of people without transportation
- Senior citizens

- Usage pattern taken from **Living Well in Wabash County CoA** RouteMatch® software records when the survey was done in 2016.

Service Availability for each mode:

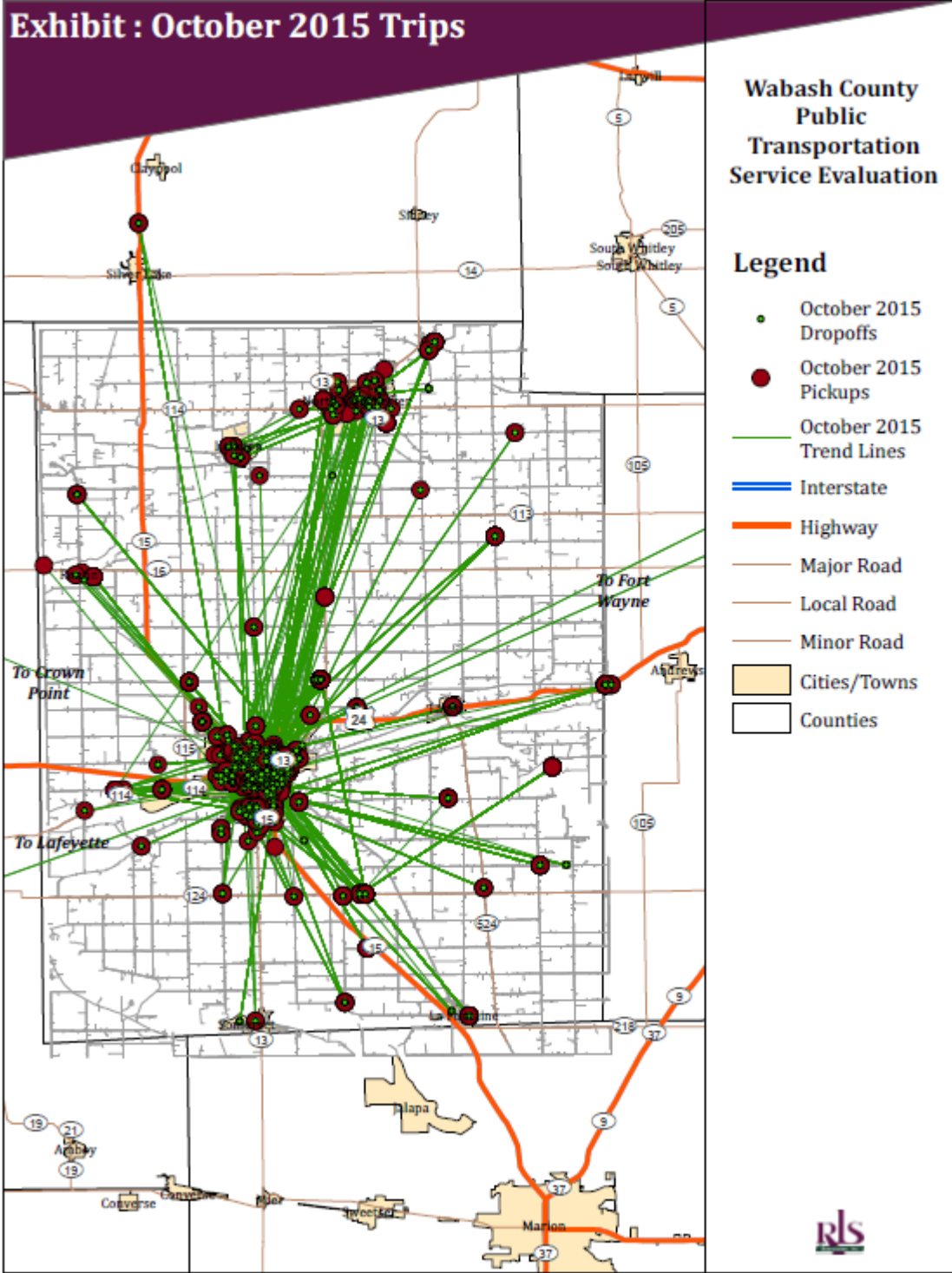
The Green Line was designed to operate within the City of Wabash based upon usage patterns, from June and October 2015 for the National RTAP study in 2016. Ride requests have not changed much, if at all since then. The route offers a 3/4-mile deviation which must be requested 24 hours in advance. Time for deviations was built into the initial schedule and expanded to be more user friendly by deviating to take people home sooner so they would not have to ride the entire route. The time on the bus was a negative factor for potential riders who did not want to ride the entire route to get where they wanted to go. The original plan was to run two buses north to south, but we do not have the resources/drivers and buses to do that. The regulation that the vehicles cannot be switched between demand response to point deviation fixed and then to demand response as needed has proven to be a limiting factor. People did not want to ride the route if they could get there faster with demand response. They were fine with it when the driver could deviate within 3/3-mile from the route, but that was difficult for dispatchers and the public to understand because it could not be guaranteed. Someone else within 3/4 mile of the route could request a deviation 24 hours in advance. Our RouteMatch® software's additional platform for point deviation was cost prohibitive. We used a capitol gift specifically donated for the software to purchase Sha Software, Inc®. Otherwise, they preferred to use demand response. The point of the service is to consolidate the trips and give people predictable pick-up times without needing to schedule rides.

The Connector was designed, but never launched to expand access to the City of Wabash and the Town of North Manchester.

Both routes and stops were based on survey data as demonstrated on the two maps which showed two different seasons of usage. Demand response service picks up within the same areas when the point deviation route does not meet the riders' need. This hiccup in the system will be addressed with the implementation of Sha Software, Inc.® The fixed route runs with the 3/4-mile deviation. The driver of the route, as it was previously, was deviating to get riders back faster, but the publication of the standard stops, and times was a difficult hurdle to surmount. As such, your system has not collected data regarding walking distances to bus stops since the demand response service can accommodate those individuals beyond the 3/4 mile deviated fixed route.

Living Well in Wabash County CoA provides demand response door-to-door transit service throughout Wabash County. Consideration is given to new markets as demand warrants and as resources become available.

Without a doubt, the design of the route, implementation, and marketing needs to be revisited to address rider concerns and demands.



Vehicle Assignment Policy –

With several practical considerations, Living Well in Wabash County CoA assigns buses to service so that average age of the buses serving each route does not exceed the average age of the fleet. Bus assignments consider the operating characteristics of buses of various lengths, which are matched to the operating characteristics of the route.

Transit Amenity Policy

The signs for the stops were not posted as we were still tweaking the route. There are no shelters or benches, but benches will certainly be under consideration when we reopen the Green Line and launch the Connector. Stops, shelters and benches will be placed according to industry standards (TCRP Report 19) with consideration of permitting and for local and special needs. The installation of new bus amenities can be requested by making the request to the CEO of **Living Well in Wabash County CoA**, Beverly Ferry or at public meetings.

When the annual cost of repairs to any amenity (beyond the cost of normal cleaning) is greater than the cost of the structure, **Living Well in Wabash County CoA** reserves the right to permanently remove the amenity.

Monitoring Service Standards:

FTA requires that **all providers of fixed route** public transportation develop *qualitative* policies for the following procedures. These policies are to be set by individual transit providers; therefore, these policies will apply to individual agencies rather than across the entire transit industry.

This monitoring requirement will be taken using data from the dispatching software. Systems with on-going monitoring and measurement of service standards and policies, system requirements often use the following schedule and methods.

Service Standard/Policy	Sample Schedule	Methodology
Vehicle Load	All Routes Bi-Annually	Sample of dispatch logs
Vehicle Headway	Assessed Annually as Part of Service Planning	Sample of dispatch logs
On-time Performance	Assessed Monthly	Sample of dispatch logs
Service Accessibility	Assessed Annually as Part of Service Planning	Survey samples and/or sample of dispatch logs
Vehicle Assignment Policy	Assessed Quarterly	Survey samples and/or sample of dispatch logs

VII. Summary of Changes

Service Change Evaluations Since May 2016

Since **Living Well in Wabash County CoA**'s 2016 Title VI Plan Submission there have been no increases in **Living Well in Wabash County CoA**'s fare structure. Transit was free within service area during the COVID 2020 pandemic, but the rates remain the same

There have been no general service changes to the demand response service except during the pandemic. Those temporary changes were well publicized in print (newsletter and local county-wide, free, weekly newspaper and radio). **Living Well in Wabash County CoA** introduced a point deviation route within Wabash but had to discontinue it during the pandemic due to health concerns and restrictions. The point deviation route has not been reinstated due to a shortage of drivers. The official start time has been extended to 5:40 a.m. due to demand. Dispatch hours were extended to 6 a.m., rather than 7 a.m., providing an additional hour of dispatch coverage, at the beginning of the day when there are calls about changes for that day.

These changes Future changes, the associated outreach and Title VI determination and **Living Well in Wabash County CoA**'s Board Approval will be available by contacting **Living Well in Wabash County CoA**.

Program Specific Requirements

Subrecipient Compliance

N/A to **Living Well in Wabash County CoA**, which does not have subrecipients.

Equity Analysis for Facility

[Description of any new construction related to vehicle storage, operations, or maintenance facility]

N/A to **Living Well in Wabash County CoA** as there was no new construction related to Transit.

Demographic Service Profile

Because **Living Well in Wabash County CoA** 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

[Description of pending applications]

Living Well in Wabash County CoA has no pending applications for financial assistance.

Civil Rights Compliance Reviews in the Past 3 Years

Living Well in Wabash County CoA has not been the subject of any such reviews since its 2018 submission.

Recent Annual Certifications and Assurances

Living Well in Wabash County CoA executed its most recent Certifications and Assurances to the FTA in Spring, 2021 and submitted the 2021 certifications and assurances with the 2022 5311 grant request.

Contact

For additional information on the **Living Well in Wabash County CoA** 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:

Chief Executive Officer
 Living Well in Wabash County CoA
 Wabash County Public Transportation
 239 Bond Street
 P.O. Box 447
 Wabash, IN 46992

IX. Language Assistance Plan**Improving Access for People with Limited English Proficiency (LEP)**

To ensure meaningful access to programs and activities, **Living Well in Wabash County CoA** uses the information obtained in a Four Factor Analysis to determine the specific language services that are appropriate. This analysis helps WCPT to determine if it communicates effectively with LEP persons and informs language access planning.

The Four Factor Analysis is a local assessment that considers:

The number or proportion of LEP persons eligible to be served or likely to be encountered by **Living Well in Wabash County CoA**

1. The frequency with which LEP persons encounter **Living Well in Wabash County CoA** services and programs.
2. The nature and importance of **Living Well in Wabash County CoA**'s services and programs in people's lives
3. The resources available to **Living Well in Wabash County CoA** 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 WCPT'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 because of a language barrier.

To do this, **Living Well in Wabash County CoA** will evaluate 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 most recent data base. The link is: <https://data.census.gov/cedsci/table?q=c16001&q=0500000US18169>

Service Area Overview

Living Well in Wabash County CoA's service area encompasses 412 square miles of Wabash County and is home to a population speaking more than one different language. Of the total service area population, 29,798, **.67%** of residents report speaking English less than very well. The most populous group in the category are shown below. Of the remaining populations, those reporting English “less than very well” are less than 1% of the total service area population.

Speak English “Less than very well”	Population in the Language Group	Percent of Total Population
Spanish	188	.67%

The Locations of the LEP Community

The community with the most individuals speaking English “Less than Very Well.” is North Manchester located in the northern section of Wabash County, just south of the Wabash County line.



Factor 2 – Frequency of LEP Use

There are many places where **Living Well in Wabash County CoA** riders and members of the LEP population can encounter **Living Well in Wabash County CoA** services including the use of deviated fixed route and demand response buses, calls to customer service representatives, reservation agents and WCPT's outreach materials. An important part of the development of **Living Well in Wabash County CoA's** Language Access Plan is the assessment of major points of contact, including:

- The use of on-board signage
- Signage at Hispanic grocery store
- Printed outreach materials.
- Demand response reservation dispatchers.
- Local news media (print and radio).

Living Well in Wabash County CoA will distribute a language survey to its employees. The objective of the survey will be to evaluate the needs of WCPT customers who are not able to communicate in English. The first question asked, How Do You Interact with WCPT riders? The chart below illustrates the results.

Method of Interaction	Percent of Responses
Telephone	57%
Face to Face	71%
Email	29%
Fax	0%

Next, the survey asked how often employees encounter LEP customers. The chart below outlines the results.

Frequency of Interaction	Percent of Responses
Often	0
Sometimes	0
Rarely	57%
Never	43%

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

Language	Percent of Interactions
Spanish	
Often	0%
Sometimes	0%
Rarely	57%
Never	43%

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

Effectiveness	Percent of Total Responses
Very Effective	14%
Moderately Effective	14%
Less Effective	57%
Unable to Communicate	14%

Community Partners

Living Well in Wabash County CoA will also canvass its community partners to assess the extent to which they encounter LEP populations. Community partners will be 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?
5. What methods do you recommend for reaching the non-English speaking people who need our services?

This is what we asked in the survey of partners

Question	Jeff Patton, ARC of Wabash County	Julie Garber Community Foundation of Wabash County	Danielle Gargiulo Bowen Center, Wabash
Do you encounter non-English speaking/reading people who need your services?	No	Yes	Yes
If so, what are the top three languages that you encounter?	N/A	Spanish mostly	Spanish American Sign Language
How do you address language barriers?	N/A	Speaks modest Spanish Calls in someone Children interpret for parent	Uses Lingo Interpreters
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, **Living Well in Wabash County CoA** will work with local community members fluent in both English and Spanish to reach out. Our intension is to work through the Hispanic grocery store. The first piece is building trust. We will seek answers to the following questions in working with the grocery store, the Catholic Church in both Wabash and North Manchester and our Hispanic community volunteer based in North Manchester We will seek answers to the following questions:

- Is language barrier to accessing public transportation?
- Have you or anyone you know had trouble calling in and reserving a public transit ride?
- What can **Living Well in Wabash County CoA** do to improve the process for utilizing?
- What is the best way to distribute our rider guide in Spanish?
- Do you or someone you know need rides? Is language a barrier?

In addition to the U.S. Census data, employee survey, and outreach to community partners, **Living Well in Wabash County CoA** is working with a member of the Hispanic community/English as a second language in North Manchester to develop outreach.

Factor 3 – The Importance of Language Line (831) 648-7582 Service to People’s Lives

Access to the services provided by **Living Well in Wabash County CoA** are critical to the lives of many in the service area. Many depend on **Living Well in Wabash County CoA**’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 Americans 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.

2021 Data Reflecting Trip Purpose

Employment	33%
Medical	22%
Shopping	17%
Business	10%
Education	6%
Social/Recreation	6%
Food Pantries/Soup Kitchens	4%
Family/Friends	2%
Total	100%

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 **Living Well in Wabash County CoA** 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
- Complaint and comment forms
- Outreach related to opportunity for public comments
- Information about demand response services
- What to do in an emergency (where to look for service change announcements)

The following notice and the Language Line (831) 648-7582 Public are on all **Living Well in Wabash County CoA**

The Living Well in Wabash County CoA 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 WCPT.

Any person who wants additional information on **Living Well in Wabash County CoA'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 because of race, color, or national origin may file a complaint with the **Living Well in Wabash County CoA** within 180 days of the date of the alleged discrimination.

To file a complaint, contact **Living Well in Wabash County at (260) 563-7536**, www.livingwellinwabashcounty.org or send a letter to CEO, P.O. Box 447, 239 Bond Street, Wabash, IN 46992. A complaint may also be filed directly with the FTA, Office of Civil Rights, 1200 New Jersey Avenue SE, Washington DC 20590.

La compañía **Living Well in Wabash County** 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 proveídos 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 **Living Well in Wabash County CoA** dentro de los 180 días siguientes a la fecha de la supuesta discriminación.

Para presentar una queja al **Living Well in Wabash County CoA**, llame al (260) 563-7536, www.livingwellinwabashcounty.org, o escribe una carta y envía a P.O. Box 447, P.O. Box 447. 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

Living Well in Wabash County CoA has committed resources to community outreach and improving access to its services and programs for LEP persons. Bilingual information (English/Spanish) will be distributed including the following:

- A bilingual English/Language(s) Rider’s Guide to demand response services.
- Bilingual English/Language(s) on-board signage

We will translate more documents based on the outreach plan to be developed in 2022 and 2023. To date, the costs associated with these efforts fit within the **Living Well in Wabash County CoA’s** marketing and outreach budget.

Outcomes

New tools and alerting riders of language assistance

Following the “Four Factor Analysis”, **Living Well in Wabash County CoA** concluded there is a limited need for increased 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.

Currently:

1. **Language Line (831) 648-7582 has been used since 2003** for telephone communications with customer service representatives
2. **Welcome to Transit and Rider Guide** have been sent via U.S. Postal Service within a week of their registration as a rider to each new rider since 2021. Spanish translations are sent to riders for whom Spanish is their first language. Google Translation was used for these.

Currently Being Developed:

3. Recruiting new staff or contract employee charged with improvement community engagement; and

The language line is currently available and included in English/Spanish rider guide.

Living Well in Wabash County CoA will consider the information gleaned from the staff survey.

Oversight

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

The monitoring of the Language Assistance Plan will include:

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

Post-Event Assessments

Following service changes, fare increases, and planning projects transit staff leaders and designated Board members assigned to Transit 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

Living Well in Wabash County CoA will conduct 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. **Living Well in Wabash County CoA** office staff proficiently use translation applications. They will also receive related annual training.

Employee awareness training for the ability to basically communicate with the LEP and low-literacy population.

Living Well in Wabash County CoA will include awareness training annually.

Translation of Vital Documents

Living Well in Wabash County CoA is not required to translate vital documents into Spanish.

The list of documents that are translated is provided below: They have been submitted to the web site developer. We anticipate that the current, outdated website will be taken down by the end of March, if not sooner, and replaced with the new site. Both Spanish and English version important documents will be posted on the new site.

Living Well in Wabash County CoA will work with the local organizations (Learn More Center, etc.) to determine the best outreach methods and will strive to provide these vital documents in Spanish.

- ◆ Civil Rights Complaint Form
- ◆ Service change announcements
- ◆ On-board notices
- ◆ Rider Guide
- ◆ Service Complaint Forms