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# TITLE VI PLAN

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Cass Area Transit



OCTOBER 21, 2023

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# I. INTRODUCTION

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## CASS AREA TRANSIT'S COMMITMENT TO CIVIL RIGHTS

This update of Cass Area Transit's Title VI Program has been prepared to ensure that the level and quality of Cass Area Transit's **demand response services** are provided in a nondiscriminatory manner and that the opportunity for full and fair participation is offered to Cass Area Transit's riders and other community members. Additionally, through this program, Cass Area Transit's 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 Cass Area Transit 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 Cass Area Transit'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), Cass Area Transit 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 Cass Area Transit'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 Cass Area Transit's riders aware of its commitment to Title VI compliance, and their right to file a civil rights complaint, Cass Area Transit will provide the following information in both English and **Spanish** on its **web page or in person if requested**

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

*Cass Area Transit 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 Cass Area Transit's. For more information on Cass Area Transit's civil rights program and the procedures to file a complaint, please contact Cass Area Transit 574-722-2424 email [gspencer@casstransit.com](mailto:gspencer@casstransit.com) or visit our administrative office at 115 S Sixth Street Logansport Indiana 46947 from 8 am to 5 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 Cass Area Transit's programs and services, visit [www.casstransit.com](http://www.casstransit.com). If information is needed in another language, please contact 574-722-2424.*

### **Discrimination Complaint Procedures**

Cass Area Transit 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 Cass Area Transit may file a Title IV complaint by completing and submitting the agency's Title VI Complaint available at our administrative offices or on our website [www.casstransit.com](http://www.casstransit.com).

Cass Area Transit will notify INDOT of all formal complaints within five business days of receiving the complaint.

If you believe that you have received discriminatory treatment by Cass Area Transit on the basis of race, color, or national origin you have the right to file a complaint with the Cass Area Transit Director of Transportation.

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

Complete the Complaint Form, and send it to:

Cass Area Transit  
115 S Sixth Street  
Logansport, Indiana 46947

Verbal complaints are accepted and transcribed by The Executive Director or the Transportation Director. To make a verbal complaint, call 574-722- 2424 and ask for Garvin Spencer.

Cass Area Transit investigates complaints received within no more than **30 days** of the alleged incident. Cass Area Transit will process complaints that are complete. Once the complaint is received, Cass Area Transit will review it and the complainant will receive an acknowledgement letter informing them whether the complaint will be investigated by Cass Area Transit.

Cass Area Transit has up to 30 days to investigate the complaint. If more information is needed to resolve the case, the Cass Area Transit may contact the complainant. The complainant has 90 days from the date of the letter to send requested information to the investigator assigned to the case.

If Cass Area Transit 's investigator is not contacted by the complainant or does not receive the additional Information within 90 days, Cass Area Transit can administratively close the case. A case can also be administratively closed 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.

An 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 30 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

**Complaint Form:**

Provided below is the Title VI and ADA complaint form for submitting a complaint.

# DISCRIMINATION COMPLAINT FORM

## TITLE VI AND ADA

<b>Section I:</b>		
Name:		
Address:		
Telephone (Home):	Telephone (Work):	
Electronic Mail Address:		
Accessible Format Requirements?	<input type="checkbox"/> Large Print	<input type="checkbox"/> Audio Tape
	<input type="checkbox"/> TDD	<input type="checkbox"/> Other
<b>Section II:</b>		
Are you filing this complaint on your own behalf?	<input type="checkbox"/> Yes*	<input type="checkbox"/> No
<i>*If you answered "yes" to this question, go to <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.		
_____		
_____		
_____		
<b>Section IV:</b>		

Have you previously filed a Discrimination Complaint with this agency?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, please provide any reference information regarding your previous complaint. _____ _____		
<b>Section V:</b>		
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, check all that apply: <input type="checkbox"/> Federal Agency: _____ <input type="checkbox"/> Federal Court: _____ <input type="checkbox"/> State Agency: _____ <input type="checkbox"/> State Court: _____ <input type="checkbox"/> Local Agency: _____		
Please provide information about a contact person at the agency/court where the complaint was filed.		
Name:		
Title:		
Agency:		
Address:		
Telephone:		
<b>Section VI:</b>		
Name of agency complaint is against:		
Name of person complaint is against:		
Title:		
Location:		
Telephone Number (if available):		

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

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

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

Cass Area Transit  
115 S Sixth Street  
Logansport, Indiana 46947  
TITLE VI/ADA CONTACT PERSON 574-722-2424 and ask for **Garvin Spencer**.

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



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

Cass Area Transit maintains a list of active investigations conducted by FTA and entities other than FTA, including lawsuits and complaints naming Cass Area Transit 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 Cass Area Transit 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.

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

Type (Investigation, Lawsuit, Complaint)	Date	Summary of Complaint	Status	Action(s) Taken
None				

III. Cass Area Transit

**PUBLIC PARTICIPATION PLAN**

**Key Principles**

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

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

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

Cass Area Transit'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 - Cass Area Transit will proactively reach out to and engage low income, minority and LEP populations from the Cass Area Transit 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 – Cass Area Transit 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.

Cass Area Transit 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, Cass Area Transit will post service change notices on appropriate buses and stops **7 days** in advance of the change date.

#### IV. Cass Area Transit

### **PUBLIC PARTICIPATION PROCESS**

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

##### Cass Area Transit

PPP includes many new mediums extending beyond the traditional approach which relied on legal notices and intermittent media coverage. While Cass Area Transit maintains these elements to its outreach program along with traditional seat-drop flyers, Cass Area Transit 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. Cass Area Transit Executive Director, Transportation Manager along with the Board of Directors will post and hold a meeting where any passenger or member of the community that wishes to be heard may appear and be heard on any changes. All changes will be posted 90 days prior to change.
3. Proposals are reviewed by Cass Area Transit's Passenger Advisory Committee (PAC).
4. A Title VI review of the proposal is conducted.
5. If required, authorization from the Cass Area Transit's 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 Cass Area Transit's service area.
7. Bilingual English and Spanish 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 Cass Area Transit community partners;
  2. Outreach is conducted in advance of any service or fare change;
  3. Bilingual system timetable and website updated in advance of the proposed change.

### **Selection of Meeting Locations**

When determining locations and schedules for public meetings, Cass Area Transit will:

- Schedule meetings at times and locations that are convenient and accessible for minority and 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.
- Print – Newspapers and other periodicals (Pharos-Tribune, Senior Center Newsletter)
- Outdoor – Advertising on-board buses (interior and exterior) and in bus shelters
- Website -- Cass Area Transit has assembled a comprehensive website
- Online – via Cass County Online website and app
- Social Media – Cass Area Transit has used Facebook since 2019 to help engage community
- Radio – WSAL/The River
- Public Information Sessions

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

#### **Stakeholder List**

Any community organization or person can be added to the Cass Area Transit's stakeholder list and receive regular communications regarding service changes by contacting the CAT administrative office at 574-722-2424. Local organizations and businesses can also request that a speaker from Cass Area Transit attend their regular meeting by calling the same number or through the website at [www.casstransit.com](http://www.casstransit.com).

## V. DECISION MAKING BODIES

### Non-Elected Committees and Councils

At Cass Area Transit, decisions regarding policy, service changes, fares, capital programming and facility locations are made by a municipally appointed Board of Commissioners. Cass Area Transit's Board of Commissioners is composed of 9 members representing cities and the community.

### Service Review Committee

Cass Area Transit has an employee-based internal committee comprised of Bus Operators, supervisors and trainers. It meets regularly to discuss possible service modifications from the perspective of Operators. Membership is voluntary and open-ended (i.e., members are not appointed and they may serve for as long as they desire) and changes from time to time.

Body	Caucasian	African American	Hispanic	Asian	Race 4	Race 5
Board of Commissioners	9					
Passenger Advisory Committee	2					
Service Review Committee	6					

## VII. SUMMARY OF CHANGES

### Service Change Evaluations Since 2020

Since Cass Area Transit's 2008 Title VI Plan Submission there have been no changes in Cass Area Transit's fare structure. There have been no service changes. Any changes, the associated outreach and Title VI determination and Cass Area Transit's Board Approval are available by contacting Cass Area Transit.

### Program Specific Requirements

#### Title VI Monitoring (from 2020 Title VI Plan)

The results of the ongoing monitoring of service standards as defined in the Cass Area Transit [2021] program can be obtained by contacting Cass Area Transit.

### Demographic Service Profile

Because Cass Area Transit operates fewer than 50 buses in peak service, a demographic service profile was not prepared for this plan update.

## **VIII. GRANTS, REVIEWS AND CERTIFICATIONS**

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

Cass Area Transit's has not been the subject of any such reviews since its 2018 submission.

### **Contact**

For additional information on the Cass Area Transit 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:

#### Contact information

Garvin Spencer

Director of Transportation

[gspencer@casstransit.com](mailto:gspencer@casstransit.com)

574-722-2424

## **IX. LANGUAGE ASSISTANCE PLAN**

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

In order to ensure meaningful access to programs and activities, Cass Area Transit uses the information obtained in a Four Factor Analysis to determine the specific language services that are appropriate. This analysis helps Cass Area Transit 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 Cass Area Transit
2. The frequency with which LEP persons come into contact with Cass Area Transit services and programs.
3. The nature and importance of Cass Area Transit services and programs in people's lives; and
4. The resources available to Cass Area Transit 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 Cass Area Transit 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, Cass Area Transit 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 Data was reviewed by Cass Area Transit’s board of Directors in its entirety.

**Service Area Overview**

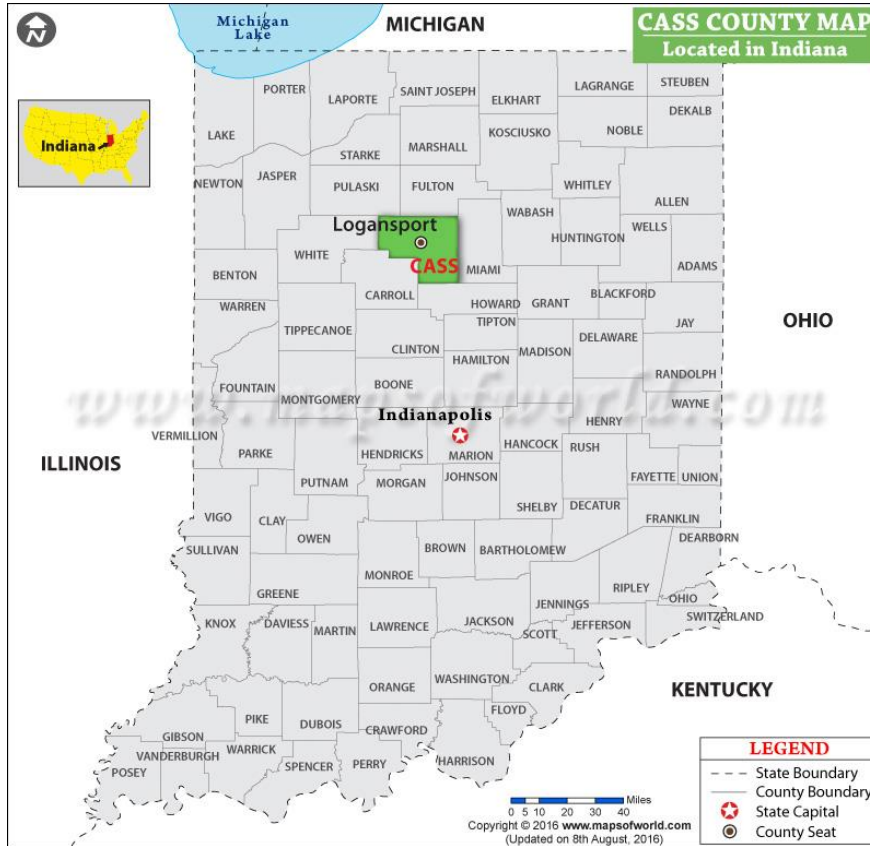
Cass Area Transit’s service area encompasses approximately 415 square miles of Cass County and is home to a population speaking more than 4 different languages. Of the total service area population (37,540), 30% of residents report speaking English less than very well. The most populous groups in the category are shown below. Of the remaining populations, those reporting English “less than very well” range from 10% to 30% of the total service area population.

<b>Speak English “Less than very well”</b>	<b>Population in the Language Group</b>	<b>Percent of Total Population</b>
Spanish	6644	17.7 %
Asian and Pacific Island	750	2%
French/other	75	1.8%
Other	750	2%



**The Locations of the LEP Community**

The map in Exhibit A illustrates the distribution of population densities by Census Tract where individuals speak English “Less than Very Well.”



## **Factor 2 – Frequency of LEP Use**

There are many places where Cass Area Transit riders and members of the LEP population can come into contact with Cass Area Transit services including the use of fixed route and demand response buses, calls to customer service representatives, reservation agents and Cass Area Transit outreach materials. An important part of the development of Cass Area Transit Language Access Plan is the assessment of major points of contact, including:

- Use of the bus service on-board signage, announcements and driver language skills.
- Communication with Cass Area Transit customer service staff.
- Bus pass sales.
- Printed outreach materials.
- Web-based outreach materials.
- Public meetings.
- Demand response reservation agents.
- Local news media (Pharos-Tribune, Cass County Online, WSAL/The River radio).
- Automatic, service-related audio announcements on-board Cass Area Transit buses; and
- Service-related posters at Cass Area Transit bus terminal.

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

<b>Method of Interaction</b>	<b>Percent of Responses</b>
Telephone	65%
Face to Face	30%
Email	5%
Fax	

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	45%
Sometimes	45%
Rarely	10%
Never	

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

Language	Percent of Interactions
Spanish	35%
English	60%
other	5%

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

Effectiveness	Percent of Total Responses
Very Effective	40%
Moderately Effective	10%
Less Effective	40%
Unable to Communicate	10%

### Community Partners

Cass Area Transit also canvassed its community partners to assess the extent to which they came into contact with LEP populations. Community partners were asked the following questions:

1. Do you encounter non-English speaking/reading people who need your services?
2. If so, what are the top three languages that you encounter?
3. How do you address language barriers?
4. Do you find language to be a barrier in preventing you from providing service?

<u>Question</u>	<u>Area V</u>	<u>Tyson</u>	<u>Partner Name</u>
Do you encounter non-English speaking/reading people who need your services?	Yes	Yes	
If so, what are the top three languages that you encounter?	Spanish, Burmese, Creole/French	Spanish, Burmese, Creole/French	
How do you address language barriers?	Translators/informational pamphlets	Translators/informational pamphlets	
Do you find language to be a barrier in preventing you from providing service?	sometimes	occasionally	

### **Factor 3 – The Importance of Cass Area Transit’s Service to People’s Lives**

Access to the services provided by Cass Area Transit is critical to the lives of many in the service area. Many depend on Cass Area Transit 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.

<b><u>Trip Purpose</u></b>	<b><u>Percentage of Trips</u></b>
<b><u>Work</u></b>	<b><u>60 %</u></b>
<b><u>Medical</u></b>	<b><u>8%</u></b>
<b><u>Groceries</u></b>	<b><u>2 %</u></b>
<b><u>Other</u></b>	<b><u>30%</u></b>

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 Cass Area Transit which can affect access includes:

- Route and schedule information
- Fare and payment information
- Information regarding making the best use of the system (How To)
- Service announcements
- Safety and security announcements
- Complaint and comment forms
- Outreach related to opportunity for public comments
- Information about demand response services under the ADA and other special programs
- What to do in an emergency (where to look for service change announcements)

#### **The following notice is posted on all Cass Area Transit vehicles:**

Cass Area Transit 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 Cass Area Transit.

Any person who wants additional information on Cass Area Transit’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 Cass Area Transit within 180 days of the date of the alleged discrimination.

To file a complaint, contact Cass Area Transit at 574-722-2424, [www.casstransit.com](http://www.casstransit.com) or send a letter to [115 South Sixth Street Logansport Indiana 46947. A complaint may also be filed directly with the FTA, Office of Civil Rights, 1200 New Jersey Avenue SE, Washington DC 20590.

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La compañía Cass Area Transit garantiza que ninguna persona, por motivos de raza, color, o origen nacional estén excluida de la participación o negado de los beneficios o ser sujeto de discriminación en respecto a los servicios proveidos de la Autoridad del transporte público.

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

Para presentar una queja al Cass Area Transit, llame at 574-722-2424, [www.casstransit.com](http://www.casstransit.com), o escribe una calta y envía a 115 South Sixth Street Logansport Indiana 46947 . 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**

Cass Area Transit has committed resources to improving access to its services and programs for LEP persons. Today, bilingual information English/Spanish is distributed in an extensive number of mediums including the following:

- ◆ A bi-lingual English/Language(s) website
- ◆ A complete bilingual English/Language(s) system timetable
- ◆ A complete bilingual English/Language(s) Rider’s Guide to demand response services (ADA paratransit)
- ◆ Bilingual English/Language(s) outreach materials (seat drops and service change alerts)
- ◆ Bilingual English/Language(s) customer service representatives
- ◆ Bilingual English/Language(s) Demand Response reservation agents/customer service representatives
- ◆ Bilingual English/Language(s) on-board signage
- ◆ Bilingual English/Language(s) guides and training for Cass Area Transit drivers
- ◆ A bilingual English/Language(s) explanation on how to use Cass Area Transit farebox

To date, the costs associated with these efforts fit within the Cass Area Transit marketing and outreach budget. Costs are predominantly associated with translation services and material production.

## **Outcomes**

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

Following the “Four Factor Analysis”, Cass Area Transit concluded that, while there is currently extensive outreach and materials for the Language(s) speaking LEP population of the service area, additional services would assist other LEP populations regardless of the total population in the region. These include:

1. Adding Google Translate to the Cass Area Transit website.
2. Adding translation services for telephone communications with customer service representatives.
3. Assigning new staff charged with improvement community engagement; and
4. Creating a page with multiple languages for print (system timetable) and web-based posting indicating how Cass Area Transit’s provides language assistance.
5. Use a smart phone with translation application.

The above items were put on hold during the pandemic, and will be revisited in the near future.

Additional recommendations gleaned from the internal staff survey include:

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

Cass Area Transit is considering all these items and other methods that become available.

## **Oversight**

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

The monitoring of the Language Assistance Plan will include:

- ◆ Annual reviews of regional census data for changing patterns of LEP populations.
- ◆ Update the policy every three years.
- ◆ Ongoing collaboration with regional partners.
- ◆ Ongoing review of Google Translate requests at Cass Area Transit’s website; and
- ◆ Post Event Assessments (PEA)

### **Post-Event Assessments**

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

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

### **Training Employees**

Cass Area Transit 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. Cass Area Transit also conducts training for office staff on how to use translation applications.

Employee awareness training for basic communication with the LEP and low-literacy population:

- Information is printed in Spanish
- Bilingual Office staff always on duty
- Additional bilingual drivers are needed

### **Translation of Vital Documents**

Cass Area Transit has translated some information into Spanish and is reviewing the demand for translating others. The list of documents being considered for translation is provided below:

- ◆ Civil Rights Complaint Form – Translated into Spanish in January 2022
- ◆ ADA Eligibility Applications – Translated in [date]
- ◆ ADA Service Overview Booklet – Translated into [language(s)] in [date]
- ◆ Service change announcements – Translated into [language(s)] since [year]
- ◆ On-board notices – Translated into [language(s)] since [year]
- ◆ Notification of free language services – New print and web-based content [will be/was] complete(d) in [date]
- ◆ Maps and schedules, rider information, ADA service information, news and event announcements are all translated into [language(s)] on Cass Area Transit website [www.casstransit.com](http://www.casstransit.com)
- ◆ Service Complaint Forms – Will be translated upon request