

I. Plan Statement:

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance" (42 U.S.C. Section 2000d).

Wabash County Transit (WCT) is committed to ensuring that no person is excluded from participation in, or denied the benefits of its' transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.A.

This plan was developed to guide **WCT** in its administration and management of Title VI-related activities.

Title VI Coordinator - Contact information:

Beverly Ferry, Title VI / ADA Coordinator
239 Bond Street, Wabash, In 46992
Phone (260) 563-4475

II. Title VI Information Dissemination:

Title VI information posters shall be prominently and publicly displayed in the transit facility and on transit revenue vehicles. The name of the Title VI coordinator is available on Wabash County's website at <http://www.livingwellinwabashcounty.org>. Additional information relating to nondiscrimination obligation can be obtained from the Title VI Coordinator.

Title VI information shall be disseminated to transit employees annually via the Employee Training Session (see Appendix A) that we mandate all our employees to do annually. This training reminds employees of the County's policy statement, and of their Title VI responsibilities in their daily work and duties.

During New Employee Orientation, new employees shall be informed of the provisions of Title VI, and the County's expectations to perform their duties accordingly.

All employees shall be provided a copy of the Title VI Plan and are required to sign the Acknowledgement of Receipt (see Appendix B).

All employees shall attend the annual Title VI in-service conducted by LWWC and sign an attendance sheet. (See Appendix C)

III. Subcontracts and Vendors:

All subcontractors and vendors who receive payments from **WCT**, where funding originates from any federal assistance are subject to the provisions of Title VI of the Civil Rights Act of 1964 as amended. Written contracts shall contain non-discrimination language, either directly or through the bid specification package which becomes an associated component of the contract.

IV. Record Keeping:

The Title VI Coordinator will maintain the Title VI binder containing permanent records, which include, but are not limited to, signed acknowledgements of receipt from the employees indicating the receipt of the of **WCT** Title VI Plan, copies of Title VI complaints or lawsuits and related documentation, and records of correspondence to and from complainants, and Title VI investigations.

V. Title VI Complaint Procedures:

How to file a Title VI Complaint?

The complainant may file a signed, written complaint up to one hundred and eighty (180) days from the date of the alleged discrimination. The complaint should include the following information:

- Your name, mailing address, and how to contact you (i.e., telephone number, email address, etc.)
- How, when, where and why you believe you were discriminated against. Include the location, names and contact information of any witnesses
- Other information that you deem significant

The Title VI Complaint Form (see Appendix C) may be used to submit the complaint information. The complaint may be filed in writing with Living Well in Wabash County at the following address:

Title VI / ADA Coordinator
Living Well In Wabash County, COA
P.O. Box 447, 239 Bond Street
Wabash, IN 46992

NOTE: **WCT** encourages all complainants to certify all mail that is sent through the U.S. Postal Service and/or ensure that all written correspondence can be tracked easily. For complaints originally submitted by facsimile, an original, signed copy of the complaint must be mailed to the Title VI Coordinator as soon as possible, but no later than 180 days from the alleged date of discrimination.

What happens to the complaint after it is submitted?

Once the complaint is received, **WCT** 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.

WCT has **7** days to investigate the complaint. If more information is needed to resolve the case, **WCT** may contact the complainant. The complainant has **07** business days from the date of the acknowledgement 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 **180** business days, **WCT** can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue his or her case.

After the investigator reviews the complaint, she/he will issue one of two 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. 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 **180** days after the date of the letter or the LOF to do so.

All complaints alleging discrimination based on race, color or national origin in a service or benefit, provided by the county will be directly addressed by the county within 60 days of receipt of the complaint. The county shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. Additionally, the county will make every effort to address any and all complaints in an expeditious and thorough manner.

How will the complainant be notified of the outcome of the complaint?

Once sufficient information for investigating the complaint is received by **WCT**, a written response will be drafted subject to review by the County's attorney. The **WCT** will send a final written response letter to the complainant notifying complainant that the complaint is or is not substantiated.

A Summary of Finding (SOF) will also be included that will summarize the allegation, interviews, course of action taken with the staff member involved or other pertinent information regarding the complaint.

The complainant is also advised of his or her right to 1) appeal within seven calendar days of receipt of the final written decision from the County, and/or 2) file a complaint externally with the U.S. Department of Transportation and/or the FTA. Every effort will be made to respond to Title VI complaints within 60 working days of receipt of such complaints, if not sooner.

In addition to the complaint process described above, a complainant may file a Title VI complaint with the following offices:

Federal Transit Administration Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, 5th Floor - TCR
1200 New Jersey Ave., SE
Washington, DC 20590

VI. Limited English Proficiency (LEP) Plan

2011 Census information regarding the demographic population of Wabash County is provided below. Currently LWWC has one citizen/agency advisory council, known as Wabash County TAC (Transit Advisory Council). In the creation, expansion and operation of all such committees or councils for community input, efforts will be made to encourage participation of minorities.

Body	Caucasian	Latino	African American	Asian American	Native American
Population	97.1%	2.2%	0.7%	0.5%	0.7%
Transit Advisory Council TAC	100%	0	0	0	0

The WCT provides dispatch assistance to those with LEP through Indiana Relay TTY/Voice/ASCII/VCO at 800-743-3333 and Spanish relay at 800-435-8590. The WCT also provides printed material in the appropriate format upon request for help in understanding the service, to assist in overcoming language and audio/visual barriers.

VII. Community Outreach

Community Outreach is a requirement of Title VI. Recipients and sub-recipients shall seek out and consider the viewpoints of minority and low-income populations in the course of conducting public outreach. Recipients have wide latitude to determine what specific measures are most appropriate and should make this determination based on the composition of the affected population, the public involvement process and the resources of the recipient. As an agency receiving federal financial assistance, we have made the following community outreach efforts:

WCT has engaged the public in its planning and decision-making processes, as well as its marketing and outreach activities. Currently the public is invited to participate in these activities:

Transportation Advisory Committee Meetings: The Committee holds quarterly meetings which are to be submitted as news releases to the two local radio stations and the two local newspapers to encourage the public to attend.

Public Meetings: When applying for grants or proposing changes in service public input is solicited in the process Customer Comment/Complaint Process, citizens may call WCT’s Transit Manager at 260-563-4475 or the agency CEO to lodge a complaint or comment. All complaints/comments are

researched and response is given back to the citizen. The county’s transit comment/complaint process is updated annually as needed.

Annual State/Federal Grant Application: We submit to the Indiana Department of Transportation annually an application for funding. When application requests funding for capital assistance such as through 5311, part of the application it is a public notice, which includes a 30-day public comment period. When applying for capital funding through programs such as 5310 letters are sent to area groups and agencies asking for feedback on the grant application. We do the same with our 5311 operating grant requests which are submitted to INDOT.

VIII. **WCT** will provide updated information on our website <http://www.livingwellinwabashcounty.org> regarding any investigations, lawsuits and/or complaints lodged against the transit system in order to comply with federal regulations. The format used in this notification is below.

List of Investigations, Lawsuits and Complaints

	Date	Basis of Complaint (race, color, or national origin)	Status	Action(s) Taken
Investigations	0			
1.				
2.				
Lawsuits	0			
1.				
2.				
Complaints	0			
1.				