

***Federal Transit Administration  
Title VI Program***

**The Arc of Greater Boone County, Inc.**

**Updated February 2023**

## **Title VI Plan Table of Contents**

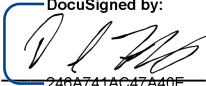
The Arc of Greater Boone County's Title VI plan includes the following elements:

1. Plan Approval, Annual Certifications and Assurances, Revision Log
2. Policy Statement
3. Notice to the Public
4. Complaint Procedure
5. Complaint Form
6. List of transit related Title VI Investigations, Complaints and Lawsuits
7. Public Participation Plan
8. Language Assistance Plan
9. Minority Representation Table and Description
10. Providing Assistance to and Monitoring Subrecipients
11. Title VI Equity Analysis for Facility Acquisition
12. Fixed Route Transit Provider Requirements

**Section 1: Title VI Plan Approval & Compliance Requirements**

Title VI Plan  
Adopted on: February 27, 2023

Adopted by: The Board of Directors of The Arc of Greater  
Boone County, Inc.

Signature(s):  246A741AC47A40E...

Approval: Dan Fleming, President

Resolution shall be maintained in Board Meeting Minutes

### Annual Certifications and Assurances

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with Title VI regulations. This requirement shall be fulfilled when the applicant/recipient submits its annual certifications and assurances. Primary recipients will collect Title VI assurances from sub-recipients prior to passing through FTA funds.

The Arc of Greater Boone County, Inc. will remain in compliance with this requirement by annual submission of certifications and assurances as required by INDOT.

The date of last submission of these certifications and assurances (at the time of this Plan’s approval) is: February 15, 2021

### Title VI Plan Revision Log

<b>Date</b> Month/day/year	<b>Section Revised</b>	<b>Summary of Revisions</b>
	n/a	

## **Section 2: Title VI Policy Statement**

### **Policy Statement**

The Arc of Greater Boone County, Inc., operating demand response transit provider, as a recipient of Federal Transit Administration (FTA) grant dollars either directly from FTA or through the Indiana Department of Transportation (INDOT), will comply with the Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the U.S. Department of Transportation implementing regulations, FTA Circular 4702.1B, and INDOT Public Transportation requirements as specified in Master Grant Agreement, and State Management Plan. The Arc of Greater Boone County, Inc. operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act.

### **Section 3: Notice to the Public**

#### **Title VI Notice to the Public**

The Arc of Greater Boone County, Inc.'s Notice to the Public is as follows:

### **Notifying the Public of Rights Under Title VI**

## **The Arc of Greater Boone County, Inc.**

- The Arc of Greater Boone County, Inc. operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with The Arc of Greater Boone County, Inc..
- For more information on The Arc of Greater Boone County, Inc.'s civil rights program, the procedures to file a complaint, or to file a complaint, please contact Executive Director at 765-482-6815 Ext 120, email [info@thearcgbc.org](mailto:info@thearcgbc.org); or visit our administrative office at 900 W Main Street, Lebanon IN 46052. For more information, visit [www.thearcgbc.org](http://www.thearcgbc.org)
- For transportation-related Title VI matters, a complaint may also be filed directly with the:

Indiana Department of Transportation, Attn: Kimberly Ray, INDOT Title VI Program Manager, 100 North Senate Avenue, Indianapolis, IN 46204; 317-232-0924; [kiray@indot.in.gov](mailto:kiray@indot.in.gov)

Federal Transit Administration, Office of Civil Rights, Attention: Complaint Team, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

- If information is needed in another language, contact 765-482-6815.

The Arc of Greater Boone County, Inc. Notice to the Public is posted in the public areas of the office and inside the transit vehicles.

1. 900 W Main Street, Lebanon IN 46052
2. Website: [www.thearcgbc.org](http://www.thearcgbc.org)

## **Section 4: Title VI Complaint Procedure**

The Arc of Greater Boone County, Inc.'s Title VI Complaint Procedure is made available in the following locations:

- Agency website: [www.thearcgbc.org](http://www.thearcgbc.org)
  - Hard copy in the central office (900 W Main Street, Lebanon Indiana)
  - Agency Title VI Plan
- 

Any individual, group of individuals or entity that believes they have been discriminated against on the basis of race, color, or national origin by The Arc of Greater Boone County, Inc. may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form.

Any individual having filed a complaint or participated in the investigation of a complaint shall not be subjected to any form of intimidation or retaliation. Individuals who have cause to think that they have been subjected to intimidation or retaliation can file a complaint of retaliation following the same procedure for filing a discrimination complaint.

A complaint must be filed with The Arc of Greater Boone County, Inc. no later than 180 days after the following:

1. The date of the alleged act of discrimination; or
2. The date when the person(s) became aware of the alleged discrimination; or
3. Where there has been a continuing course of conduct, the date on which that conduct was discontinued of the latest instance of the conduct.

Once the complaint is received, The Arc of Greater Boone County, Inc. will review it to determine if our office has jurisdiction. A copy of each Title VI complaint received will be forwarded to the Indiana Department of Transportation within ten (10) calendar days of receipt. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

The Arc of Greater Boone County, Inc. has 45 days to investigate the complaint. If more information is needed to resolve the case, The Arc of Greater Boone County, Inc. may contact the complainant requesting further information. The complainant has 10 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days, The Arc of Greater Boone County, Inc. can administratively close the case.

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

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

If the complainant wishes to appeal the decision it must direct the appeal to the agency initially. The complainant has 7 days after the date of the closure letter or the letter of finding to do so. If there is outstanding concern, the appeal may be directed to the state DOT or FTA. The appeal process information will be included in the letter.

A person may also file a complaint directly with the: Indiana Department of Transportation, Attn: Kimberly Ray, INDOT Title VI Program Manager, 100 North Senate Avenue, Indianapolis, IN 46204; 317-232-0924; [kiray@indot.in.gov](mailto:kiray@indot.in.gov)

Or

Federal Transit Administration, Office of Civil Rights, Attention: Complaint Team, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

If information is needed in another language, then contact 765-482-6815.



**Section 5: Title VI Complaint Form**

The Arc of Greater Boone County, Inc.'s Title VI Complaint Procedure is made available in the following locations:

- Agency website: [www.thearcgbc.org](http://www.thearcgbc.org)
- Hard copy in the central office (900 W Main Street, Lebanon Indiana)
- Agency Title VI Plan

<b>Section I:</b>			
Name:			
Address:			
Telephone (Home):		Telephone (Work):	
Email Address:			
Accessible Requirements?	Format	Large Print	Audio Tape
		TDD	Other
<b>Section II:</b>			
Are you filing this complaint on your own behalf?		Yes*	No
*If you answered "yes" to this question, go to Section III.			
If not, please supply the name and relationship of the person for whom you are complaining:			
Please explain why you have filed for a third party: _____			
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.		Yes	No
<b>Section III:</b>			
I believe the discrimination I experienced was based on (check all that apply):			
[ ] Race [ ] Color [ ] National Origin			
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 Title VI complaint with this agency?		Yes	No
<b>Section V</b>			
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?			
[ ] Yes [ ] No			
If yes, check all that apply:			
[ ] 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.	
<b>Name:</b>	
<b>Title:</b>	
<b>Agency:</b>	
<b>Address:</b>	
<b>Telephone:</b>	
<b>Section VI</b>	
Name of agency complaint is against:	
Contact person:	
Title:	
Telephone number:	

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date required below

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

If information is needed in another language, contact 765-482-6815.

Please submit this form to:

**Arc of Greater Boone County, Inc.**  
**900 W Main Street, Lebanon IN 46052**  
**765-482-6815**  
**info@thearcgbc.org**

**Section 6: List of Transit Related Title VI Investigations, Complaints and Lawsuits**

The Arc of Greater Boone County, Inc. maintains a list or log of all Title VI investigations, complaints and lawsuits, pertaining to its transit-related activities.

**Check One:**

  X   There have been no investigations, complaint and/or lawsuits filed against us since the last plan submission.

       There have been investigations, complaints and/or lawsuits filed against us. *See list below. Attach additional information as needed.*

	<b>Date</b> (Month, Day, Year)	<b>Summary</b> (Include basis of complaint: race, color, or national origin)	<b>Status</b>	<b>Action(s) Taken</b>
<b>Investigations</b>				
1.				
2.				
<b>Lawsuits</b>				
1.				
2.				
<b>Complaints</b>				
1.				
2.				

## **Section 7: Public Participation Plan**

### **Strategies and Desired Outcomes**

To promote inclusive public participation, The Arc of Greater Boone County, Inc. will employ the following strategies, as appropriate (make these determinations based on a demographic analysis of the population(s) affected, type of plan, program and/or service under consideration, and the resources available):

- ✓ Provide for early, frequent and continuous engagement by the public
- ✓ Select accessible and varied meeting locations and times
- ✓ Employ different meeting sizes and formats
- ✓ Use social media in addition to other resources as a way to gain public involvement

### **Public Outreach Activities**

The public outreach and involvement activities conducted by The Arc of Greater Boone County, Inc. since the last Title VI Program submission are summarized below:

- There are monthly meetings with self-advocates to obtain feedback and ideas from them and teach them how to advocate for themselves.
- The Board of Directors meets every other month and part of the review of usage of services and opportunities for program improvements. The Board of Directors includes representation of persons served and family members of service recipients
- Individuals served are offered the opportunity to provide feedback in quarterly individual meetings and through satisfaction review surveys
- Stakeholders are offered opportunity to provide feedback on annual satisfaction surveys
- Monthly open discussion meetings are held with staff to obtain feedback on how things are going and to garner ideas
- Meetings are held with other community funders, and groups including United Way of Central Indiana and Women of Impact, where community needs are shared.
- The Arc of Greater Boone County provides information about its services on Social Media and its website and periodically promotes services with local media. For example, in January 2023 a feature of an entrepreneurial program was done in the Lebanon Reporter.

## **Section 8: Language Assistance Plan**

### ***Plan Components***

As a recipient of federal US DOT funding, The Arc of Greater Boone County, Inc. is required to take reasonable steps to ensure meaningful access to our programs and activities by limited-English proficient (LEP) persons.

Limited English Proficient (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. This includes those who have reported to the U.S. Census that they speak English less than very well, not well, or not at all.

The **Arc of Greater Boone County, Inc.'s** Language Assistance Plan includes the following elements:

**Item #1:** The results of the *Four Factor Analysis*, including a description of the LEP population(s), served.

**Factor 1:** The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.

Review of data for Boone County reveals that the safe harbor threshold of individuals who are Limited English Proficient is not reached either in total numbers of individuals (more than 1000) or in percent of population (5% or more) for any language. Of the population currently served, there are 4 of Hispanic backgrounds, but all are English proficient. The Arc of Greater Boone County works with persons with intellectual and developmental disabilities. Approximately 20% of the population served has limited verbal communication skills not captured in the census analysis. Descriptions of services outline how these needs are currently addressed, which would be similar for LEP populations.

Of the 65,326 residents in The Arc of Greater Boone County, Inc. service area, 1109 residents describe themselves as speaking English less than “very well”. People of Hispanic descent are the primary LEP persons likely to utilize Arc of Greater Boone County, Inc. services. For the Arc of Greater Boone County, Inc. service area, the latest U.S. Census Bureau data shows that among the area’s population 1.70% speak English “*less than very well.*” **For these groups** who speak English “less than very well”, 31.61% speak Spanish

Boone County Indiana – Languages Spoke at Home

	Total Number of People	Percent of Population that Speaks Language other than English	Total Population of County/City/Service Area
Speak Language other than English	3,899	5.97%	65,326
Speak English Less than Very Well	1109	1.70%	65,326
Spanish	416	0.64%	65,326
French	14	0.04%	65,326
German	22	0.03%	65,326
Russian/Polish/other Slavic	132	0.20%	65,326
Other Indo-European Languages	186	0.28%	65,326
Chinese	125	0.19%	65,326
Vietnamese	1	0.001%	65,326
Other Asian or Pacific Island Languages	193	0.30%	65,326
Other and Unspecified Languages	20	0.03%	65,326

**Factor 2:** The frequency with which LEP persons come into contact with the program:

Individuals who meet the LEP criteria rarely seek services from The Arc of Greater Boone County. In the past 12 months, 0 persons who have limited English Proficiency have sought services. All current persons supported speak or understand English as their primary language. Referral sources

from services include the Office of Vocational Rehabilitation or Medicaid Waiver Case Managers. In cases where LEP individuals are referred, translation services will be made available as needed.

**Factor 3: The nature and importance of the program, activity, or service provided by the program to people's lives.**

Language is important for the social and independence building activities that are part of the Programming for The Arc of Greater Boone County.

The Arc of Greater Boone County, Inc. is committed to providing meaningful access and will provide written translation for any of its documents, when reasonable, effective and with the available resources. In other cases, The Arc of Greater Boone County, Inc. will strive to provide alternative but meaningfully accessibility. Moreover, The Arc of Greater Boone County, Inc. continually evaluates its programs, services, and activities to ensure that persons who may be LEP are always provided with meaningful access.

**Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.**

Should an individual in need of services need LEP assistance, a primary staff for that individual would be recruited. That individual providing services would have their wages funded through the individual's services budget.

The Arc of Greater Boone County, Inc. makes every effort to make its programs, services, and activities, accessible to LEP individuals. The Arc of Greater Boone County, Inc. will use available resources, both internal and external to accommodate reasonable requests for translations.

**Item #2: A description of how language assistance services are provided by language**

Language assistance services would be individually developed for each program participant in need and based on their preferred language. Determinations and plans would be developed as part of the Individualized Support Planning process required by the service funders.

**Item #3: A description of how LEP persons are informed of the availability of language assistance service**

Individuals would be informed of language assistance programs during the intake process.

In order to ensure that LEP individuals are aware of Insert Agency Name's language assistance measures, The Arc of Greater Boone County, Inc. provides the Title VI Program including the Language Assistance Plan made on website and hard copy in central office.

**Item #4: A description of how the language assistance plan is monitored and updated**

Should a person require language assistance programs, the individual plan will be monitored and updated on at least a quarterly basis and documented in the individual's program records.

Insert Agency Name will continue to update the LEP plan as required by U.S. DOT. At a minimum, the Title VI Plan will continue to be reviewed and updated every three (3) years in conjunction with the Title VI submission and use data from the U.S. Decennial Census or the American Community Survey as available, or when it is clear that the concentrations of LEP individuals are present in The Arc of Greater Boone County's service area.

Updates will continue to include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether The Arc of Greater Boone County's financial resources are sufficient to fund language assistance resources needed.
- Determine whether The Arc of Greater Boone County has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning The Arc of Greater Boone County's failure to meet the needs of LEP individuals

**Item #5: A description of how employees are trained to provide language assistance to LEP persons**

Employees would be sought who are proficient in the language needed. Training for non-language speakers would include training on translation supports available which may include the use of assistive technology for persons with disabilities.

The following training will continue to be provided to The Arc of Greater Boone County's staff:

- Information on The Arc of Greater Boone County's Title VI Procedures and LEP responsibilities.
- Description of language assistance services offered.
- Documentation of language assistance requests.
- Use of web-based interpreter services (over the phone interpretation provider).
- How to handle a potential Title VI / LEP complaint.

**Limited English Proficient (LEP) Resource Materials:**

LEP Policy

The Arc of Greater Boone County, Inc. shall provide for communication for limited English proficient riders to ensure them equal opportunity to benefit from services. Family members or friends of limited English proficient riders will not be used as translators unless specifically requested by that individual. As previously outlined in the plan, staff proficient in a language of an LEP participant will be hired to work

directly with the participant/rider. The agency will also utilize web-based translator programs if available.

**If you need help with English, please call 765-482-6815.**

### **Section 9: Minority Representation Information**

There are no non-elected transit-related boards, committees, or councils.

### **Section 10: Providing Assistance to and Monitoring Subrecipients**

1. Does agency provide funding to subrecipients?

No, the agency does not have subrecipients.

Yes.

### **Section 11: Title VI Equity Analysis for Facility Acquisition**

Title 49 CFR, Appendix C, Section (3)(iv) requires “the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin.” For purposes of this requirement, “facilities” does not include bus shelters, as they are considered transit amenities. It also does not include transit stations, power substations, or any other project evaluated by the National Environmental Policy Act (NEPA) process. Facilities included in the provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. Has the agency built a facility?

No, the agency has not built a facility.

Yes, the agency has built a facility and completed a Title VI equity analysis to compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site. (Include at the end of the Title VI plan a copy of the Title VI equity analysis.)

### **Section 12: Fixed Route Transit Providers Service Standards and Policies**

Arc of Greater Boone County, Inc.:

is a fixed route transit provider

is **not** a fixed route transit provider