

TITLE VI PLAN

Sycamore Services, Inc. dba Links Hendricks County



February 10, 2022
SYCAMORE SERVICES
1001 Sycamore LN, Danville, IN 46122

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I. INTRODUCTION

Sycamore Services, Inc. dba LINK Hendricks County 's Commitment to Civil Rights

This update of LINK Transit's Title VI Program has been prepared to ensure that the level and quality of LINK's demand response services are provided in a nondiscriminatory manner and that the opportunity for full and fair participation is offered to LINK's riders and other community members. Additionally, through this program, LINK 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 LINK 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 LINK'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), LINK 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 LINK'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 LINK riders aware of its commitment to Title VI compliance, and their right to file a civil rights complaint, LINK has presented the following information, in both English and voice, on its website and rider guide.

Your Civil Rights

LINK 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 LINK. For more information on LINK's civil rights program and the procedures to file a complaint, please contact LINK 317-718-4474 or visit our administrative office at 1001 Sycamore Lane, Danville IN 46122 from 8am – 4:30pm. 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 LINK programs and services, visit LINK Website at <https://www.sycamoreservices.com/transportation-services>. If information is needed in another language, please contact LINK office at 317-718-4474.

Discrimination Complaint Procedures

LINK 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 LINK 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 <https://www.sycamoreservices.com/transportation-services>.

LINK will notify INDOT of all formal complaints within five business days of receiving the complaint.

Discrimination Complaint Form

Title VI and ADA

Section I:		
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
Section II:		
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 Section III.</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
Section III:		
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.		

Section IV:		
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.

Section V:

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: _____

Federal Court: _____ State Agency: _____

State Court: _____ Local Agency: _____

Please provide information about a contact person at the agency/court where the complaint was filed.

Name:

Title:

Agency:

Address:

Telephone:

Section VI:

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/email this form to the following:

Sycamore Services Inc. dba LINK Hendricks County c/o Sycamore Services, Inc.
HR/QA Director, Earnie Gill, at Sycamore Services, Inc. Corporate office, 1001 Sycamore Lane, Danville Indiana 46122. Contact number: 1-866-573-0817 Email: egill@sycamoreservices.com.

A copy of this form can be found online at <https://www.sycamoreservices.com/transportation-services>.

If information is needed in another language or mode of communication, then contact: 1-866-573-0817.

For Hearing Impaired or Spanish, call Relay Indiana: Dial 711

Si se necesita información en otro idioma o modo de comunicación, a continuación, póngase en contacto con: 1-866- 573-0817. Para personas con problemas auditivos o español, llamada de retransmisión Relay Indiana: Marque 711

The Complaint Procedure

If you believe that you have received discriminatory treatment by the LINK on the basis of race, color, or national origin you have the right to file a complaint with the LINK's Quality Assurance Department.

Methods of filing a complaint:

Complete the Complaint Form, and send it to:

Sycamore Services, Inc. at 1001 Sycamore Lane, PO Box 369, Danville, IN 46122

Verbal complaints are accepted by Quality Assurance or designee. To make a verbal complaint, call 317-745- 4715 and ask for the Quality Assurance Coordinator.

LINK investigates complaints received no more than 180 days after the alleged incident. LINK will review the complaint and advise the concerned party on the disposition of the complaint.

LINK has up to thirty days to investigate the complaint. If more information is needed to resolve the case, LINK 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 LINK's investigator is not contacted by the complainant or does not receive the additional Information within thirty days, LINK can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, 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, she/he has 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

LINK maintains a list of active investigations conducted by FTA and entities other than FTA, including lawsuits and complaints naming LINK 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 LINK 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

III. LINK’S PUBLIC PARTICIPATION PLAN

Key Principles

LINK’s Public Participation Plan (PPP) has been prepared to ensure that no one is precluded from participating in LINK’s service planning and development process. It ensures that:

- Potentially affected community members will have an appropriate opportunity to participate in decisions about a proposed activity that will affect their environment and/or health;
- The public’s contribution can and will influence LINK’s decision making;
- The concerns of all participants involved will be considered in the decision-making process; and,
- LINK will seek out and facilitate the involvement of those potentially affected.

Through an open public process, LINK has developed a public participation plan to encourage and guide public involvement efforts and enhance access to LINK’s transportation decision-making

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.
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process by minority and Limited English Proficient (LEP) populations. The public participation plan describes the overall goals, guiding principles and outreach methods that LINK uses to reach its riders.

Limited English Proficient (LEP) Goals of the Public Participation Plan

The overarching goals of LINK's PPP include:

- Clarity in Potential for Influence - The process clearly identifies and communicates where and how participants can have influence and direct impact on decision making.
- Consistent Commitment - LINK 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 - LINK develops and maintains partnerships with communities through the methods described in its public participation plan.
- Quality Input and Participation - That comments received by LINK are useful, relevant, and constructive, contributing to better plans, projects, strategies, and decisions.

Objectives of the Public Participation Plan

LINK'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 - LINK will proactively reach out to and engage low income, minority and LEP populations from the LINK 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 - LINK 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.

LINK 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, LINK will post service change notices on appropriate buses and stops sixty days in advance of the change date.

Regional Partnership/Capital Programming

For its capital programming, including major facility and bus procurements, LINK uses the Board of Commissioners adopted public participation plan. This plan clearly indicates that the MPO's public participation process satisfies LINK's public participation requirements for its Program of Projects. The notices for the regional Transportation Improvement Program (TIP) also state that the notice of public involvement activities and time established for public review of and comments on the TIP will satisfy FTA's program of projects requirement.

IV. LINK'S PUBLIC PARTICIPATION PROCESS

Outreach Efforts - Alerting Riders and Encouraging Engagement

LINK's PPP includes many new mediums extending beyond the traditional approach which relied on legal notices and intermittent media coverage. While LINK maintains these elements to its outreach program along with traditional seat-drop flyers, LINK 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 (for example, LINK's Transportation Advisory Committee TAC), detailed later in this program, will review all service change proposals);
3. Proposals are reviewed by LINK's Transportation Advisory Committee (TAC);
4. A Title VI review of the proposal is conducted;
5. If required, authorization from the LINK 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 LINK service area;
7. Bilingual English and Spanish public outreach materials and a program are under development;
8. Outreach In advance of public information sessions is released (using tool-box of mediums listed below);
 1. An Email is transmitted to LINK community partners;
 2. The public comment period ends;
 3. A LINK Board summary package is presented detailing the outcome of the public participation process along with staff recommendations;
 4. The final service/fare change date is set;
 5. Outreach is conducted in advance of any service or fare change;
 6. Bilingual system timetable and website updated in advance of the proposed change.

Selection of Meeting Locations

When determining locations and schedules for public meetings, LINK 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 minority and/or LEP communities;
- Consider radio, television, or newspaper ads as well as podcasts that serve LEP populations;
- Ensure that transportation is available to and from the meeting if requested;
- Provide opportunities for public participation through means other than written communication, such as one-on-one interviews or use of audio or video recording devices to capture oral comments.

LINK Mediums

- Outdoor – Advertising on-board buses (interior and exterior) and in bus shelters
- Website – LINK has assembled a comprehensive website
- Social Media – LINK has used Facebook since 2009 to help engage community
- On-board Flyers – LINK regularly uses seat drops and flyers to provide riders with details of service changes and schedules of public meetings and hearings.
- 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 mail, email, social media, public meetings and others, all comments are assembled into a single document for presentation to the LINK 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, LINK has assembled a listing of stakeholders with whom we regularly communicate through email and direct mail. A complete list of LINK's community stakeholders can be obtained by contacting LINK.

Any community organization or person can be added to Link's stakeholder list and receive regular communications regarding service changes by contacting the LINK administrative office at 317-745-4715. Local organizations and businesses can also request that a speaker from LINK attend their regular meeting at the same number or through the LINK website www.sycamoreservices.com//transportation-services

Stakeholder List

All community members of Hendricks and Morgan Counties.

V. DECISION MAKING BODIES

Non-Elected Committees and Councils

At LINK, decisions regarding policy, service changes, fares, capital programming and facility locations are made by municipally appointed Board of Commissioners. LINK's Board of Commissioners is composed of 11 members representing LINK Hendricks and Morgan Counties. LINK also has an internal group known as the Transportation Department and an external group known as the Transportation Advisory Committee (TAC) who hold ongoing meetings to help to guide decisions regarding routes, schedules, and other topics important to the community and our riders. Meetings of the LINK Board of Commissioners and the Transportation Advisory Committee are always open to the public. *Note: Meetings have been held virtually due to Covid.

Transportation Advisory Committee (TAC).

This committee is comprised of passengers, drivers, dispatchers, and management.

At the quarterly meetings, members discuss all aspects of LINK’s services from the perspective of the public. This group offers an invaluable service to LINK. Membership is voluntary and open-ended (i.e., members are not appointed, and they may serve for as long as they desire) and it changes from time to time. Presently there are 11 members.

Body	Caucasian	African American	Hispanic	Asian	Two or More Races
Board of Commissioners	100%	0%	0%	0%	0%
Transportation Advisory Committee	100%	0%	0%	0%	0%
Population of Morgan County	97.1%	0.5%	1.7%	0.7%	1.2%
Population of Hendricks County	86.6%	7.8%	4.3%	3.1%	2.1%

VI. SUMMARY OF CHANGES

Service Change Evaluations

Since LINK’s 2008 Title VI Plan Submission there have been no changes in LINK’s fare structure. There have not been any service changes.

*Note: Safety procedures as required in response to Covid are implemented in accordance with CDC and ISDH guidelines.

Program Specific Requirements

Title VI Monitoring

The results of the ongoing monitoring of service standards as defined in LINK’s 2016 program can be obtained by contacting LINK.

Subrecipient Compliance

Memorandum of Understanding with Hendricks County Senior Services

Demographic Service Profile

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

VII. GRANTS, REVIEWS AND CERTIFICATIONS

Pending Applications for Financial Assistance

LINK does not have any pending applications at this time.

Civil Rights Compliance Reviews in the Past 3 Years

LINK has not been the subject of any such reviews since its 2018 submission.

Recent Annual Certifications and Assurances

LINK executed its most recent Certifications and Assurances to the FTA in May 2021 and is in the process of executing 2022 certifications and assurances.

Contact

For additional information on the LINK 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: LINK at 317-745-4715.

VII. LANGUAGE ASSISTANCE PLAN

Improving Access for People with Limited English Proficiency (LEP)

In order to ensure meaningful access to programs and activities, LINK uses the information obtained in a Four Factor Analysis to determine the specific language services that are appropriate. This analysis helps LINK 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 LINK;
2. The frequency with which LEP persons come into contact with LINK services and programs;
3. The nature and importance of LINK's services and programs in people's lives; and
4. The resources available to LINK 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 LINK's services, their literacy skills in English and their native language, the location of their communities and neighborhoods and, more importantly, if any are underserved as a result of a language barrier.

To do this, LINK 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 27-OCT-2021. Data was reviewed by LINK's staff in preparation for its 2021 customer satisfaction and LEP surveys to its board and advisory committees. The data and survey data will be presented to LINK's board, advisory, and County Commissioners in its entirety.

Service Area Overview

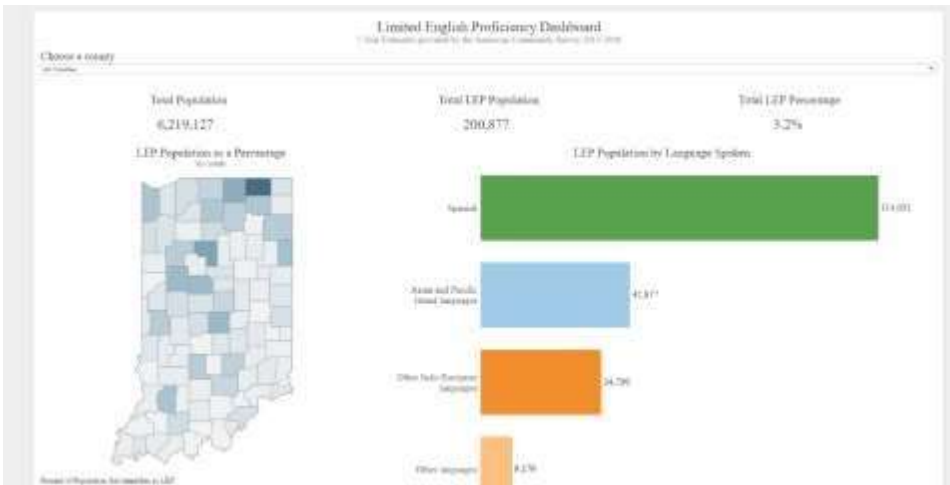
LINK's service area encompasses 818 square miles of Hendricks and Morgan Counties and is home to a population speaking more than 4 different languages. Of the total service area population, 216985, 2.6% of residents report speaking English less than very well. The most populous groups in

the category are shown below. Of the remaining populations, those reporting English “less than very ange from 0% to 2.6% of the total service area population.

Speak English “Less than very well”	Population in the Language Group	Percent of Total Population
Spanish	1698	.78%
Asian Pacific	1053	.49%

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 LINK riders and members of the LEP population can come into contact with LINK services including the use of fixed route and demand response buses, calls to customer service representatives, reservation agents and LINK’s outreach materials. An important part of the development of LINK’s Language Access Plan is the assessment of major points of contact, including:

- The use of the bus service (on-board signage, announcements, and driver language skills);
- Communication with LINK’s customer service staff;
- Printed outreach materials;
- Web-based outreach materials;
- Public meetings;
- Demand response reservation agents;
- Local news media (print and radio);

LINK will distribute a language survey to its employees. The objective of the survey will be to evaluate the needs of LINK customers who are not able to communicate in English. The new LEP survey will be part of a customer survey to be completed by 1-JAN-2022 with analyzed data

implemented by 28-FEB-2022. The first question to be asked, In What Way(s) Do You Interact with LINK riders? The chart below illustrates the results.

Method of Interaction	Percent of Responses
Telephone	22%
Face to Face	78%
Email	0%
Fax	0%

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

Frequency of Interaction	Percent of Responses
Often	0%
Sometimes	11%
Rarely	33%
Never	56%

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

Language	Percent of Interactions
Spanish	11% Sometimes, 22% Rarely, & 67% Never
Chinese including Mandarin, Cantonese	11 % Rarely & 89% Never
German	11% Rarely & 89% Never
French	100% Never
Arabic	100% Never
Polish	100% Never
Russian	100% Never

The survey will ask, overall, how effective employees are in communicating with Limited English Proficient LINK passengers. The results are summarized below.

Effectiveness	Percent of Total Responses
Very Effective	22%
Moderately Effective	44%
Less Effective	33%
Unable to Communicate	0%

Community Partners

LINK will canvass 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>Hendricks County Senior Services</u>	<u>Davita Dialysis</u>	<u>Martinsville Senior Services</u>	<u>Fresenius Kidney Care</u>	<u>Grand Valley Nursing Home</u>
Do you encounter non-English speaking/reading people who need your services?	Yes, but very infrequently	Yes	No	No	No
If so, what are the top three languages that you encounter?	Spanish and occasionally Indian Dialects	Spanish & Punjabi	n/a	n/a	n/a
How do you address language barriers?	Work with family/caregivers as available. Translation services are available as needed.	Utilize translation app	Unknown. Has not encountered this need.	Utilizes Relay Indiana	Unknown. Considering utilizing Bilingual employees. Given info about Relay Indiana
Do you find language to be a barrier in preventing you from providing service?	No, does not prevent services from being provided.	Stated it can be time-consuming to put the tools in place or have staff available at the right times.	No	No	No

Consulting Directly with the LEP Population

In addition to the U.S. Census data, employee survey, and outreach to community partners, LINK implemented a survey of its riders.

Do you speak English as a second language?	<ul style="list-style-type: none"> • 93% Report No • 7% Reported Yes
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What language do you primarily speak?	<ul style="list-style-type: none"> • One person reported speaking Swahili • One person reported speaking Indian • One Person reported speaking Hindi • All other responses noted they speak English or chose not to respond to this question.
How well do you speak/understand English?	<ul style="list-style-type: none"> • 84% Very Well • 13% Well • 4% Not Well • 0% Not at All
Do you find language to be a barrier in preventing you from receiving service?	<ul style="list-style-type: none"> • 0% reported Yes • 7% reported Sometimes • 93% Reported either No or n/a - English is their primary language.
Overall, how effectively do Link staff communicate with you if English is not your primary language.	<ul style="list-style-type: none"> • 23% Very Effective • 4% Somewhat effectively • 0% Somewhat ineffectively • 0% Very ineffectively • 73% N/A – English is their primary language.

Factor 3 – The Importance of LINK Service to People’s Lives

Access to the services provided by LINK is critical to the lives of many in the service area. Many depend on LINK’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.

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 LINK 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 LINK vehicles.

The LINK 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 LINK.

Any person who wants additional information on LINK’s nondiscrimination obligation or believes that he or she individually or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color, or national origin may file a complaint with the LINK within 180 days of the date of the alleged discrimination.

To file a complaint, contact LINK at 317-718-4474, <https://www.sycamoreservices.com/transportation-services/> or send a letter to 1001 Sycamore Lane, Danville, IN 46122. A complaint may also be filed directly with the FTA, Office of Civil Rights, 1200 New Jersey Avenue SE, Washington DC 20590.

La compañía LINK 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 LINK dentro de los 180 días siguientes a la fecha de la supuesta discriminación.

Para presentar una queja al LINK, llame al 317-718-4474, <https://www.sycamoreservices.com/transportation-services/>, o escribe una calta y envía a 1001 Sycamore Lane, Danville, IN 46122. 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

LINK has committed resources to improving access to its services and programs for LEP persons. Today, bilingual information English 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) representation at public meetings
- ◆ 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 LINK drivers.
- ◆ Increased use of Bilingual English/Language(s) Twitter Feeds and Facebook posts (not yet 100%)
- ◆ A bilingual English/Language(s) video on how to use LINK's new farebox.

To date, the costs associated with these efforts fit within LINK's 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" of the survey, LINK will review the survey data to determine the need 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 may include:

1. Adding Google Translate to the LINK website;
2. Adding translation services for telephone communications with customer service representatives;
3. Assigning new staff charged with improvement community engagement; and
4. Use a smart phone with translation application.

The above items are in process and will be launched on 28-FEB-2022.

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.

LINK 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 LINK's website; and
- ◆ Post Event Assessments (PEA)

Post-Event Assessments

Following service changes, fare increases, and planning projects, Director of Transportation or designee 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

LINK 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. LINK also conducts training for office staff on how to use translation applications.

Initial orientation includes the following training courses:

- Facilitating Communication – Barriers
- Facilitating Communication – Communication Styles
- Empowerment – Respectful Language

Annual training provides ongoing training on communication.

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

All employees are provided training to enable them to communicate with others in an acceptable and respectful manner.

Translation of Vital Documents

LINK has translated many vital documents into voice and is in the process of translating into other languages based on our customer survey. The list of documents that are or will be translated is provided below:

- ◆ Consolidated Civil Rights Complaint Form 10/2022

- ◆ Americans With Disabilities Act Guidance – Section 2 General Requirements 11/2015
- ◆ Service change announcements (as applicable)
- ◆ Rider Guide (Revised 0122)
- ◆ Notification of free language services – New print and web-based content Rider information, ADA service information, news and event announcements are all translated into Spanish as needed on LINK's website www.sycamoreservices.com