

FIRST CHANCE CENTER

TITLE VI PROGRAM

For The Following:

First Chance Center Specialized Services and Orange County Transit
Services

ADOPTED ON: April 25, 2023

**BY: Orange County Rehabilitative and
Developmental Services dba First
Chance Center's Board of Directors**

PROGRAM REVISED ON:

Table of Contents

I. Introduction	3
ORANGE COUNTY TRANSIT's Commitment to Civil Rights.....	3
II. General Requirements.....	3
Notice to the Public.....	3
Discrimination Complaint Procedures	3
The Procedure [Edit to reflect agency's complaint procedure].....	6
Active Lawsuits, Complaints or Inquiries Alleging Discrimination	6
III. ORANGE COUNTY TRANSIT's Public Participation Plan.....	7
Key Principles.....	7
Limited English Proficient (LEP) Goals of the Public Participation Plan.....	8
Objectives of the Public Participation Plan.....	8
IV. ORANGE COUNTY TRANSIT's Public Participation Process	9
Outreach Efforts – Alerting Riders and Encouraging Engagement.....	9
Selection of Meeting Locations.....	10
ORANGE COUNTY TRANSIT Mediums.....	10
Addressing Comments.....	10
The Incorporation of Public Comments into Decisions.....	10
Identification of Stakeholders	11
Our Community Partners	11
Stakeholder List	11
V. Decision Making Bodies	11
Non-Elected Committees and Councils	11
Management Team	11
Transportation Advisory Committee (TAC).....	11
VII. Summary of Changes.....	12
Service Change Evaluations Since [September 5, 2020]	12
Program Specific Requirements.....	12
Title VI Monitoring	12
Subrecipient Compliance.....	12
Equity Analysis for Facility.....	12
Demographic Service Profile.....	12
VIII. Grants, Reviews and Certifications	12

Pending Applications for Financial Assistance	13
Civil Rights Compliance Reviews in the Past 3 Years.....	13
Recent Annual Certifications and Assurances.....	13
Contact.....	13
IX. Language Assistance Plan.....	13
Improving Access for People with Limited English Proficiency (LEP).....	13
Factor 1.....	13
Service Area Overview.....	14
The Locations of the LEP Community.....	14
Factor 2.....	14
Factor 3.....	16
Factor 4.....	18
Outcomes.....	18
New tools and alerting riders of language assistance.....	18
Oversight.....	18
Monitoring, Evaluating and Updating the Language Assistance Plan and Public.....	19
Participation Process.....	19

I. INTRODUCTION

FIRST CHANCE CENTER’S COMMITMENT TO CIVIL RIGHTS

This update of **FIRST CHANCE CENTER’s** Title VI Program has been prepared to ensure that the level and quality of **FIRST CHANCE CENTER’s** demand response services provided by **OCTS** and **FCC Specialized Services** are provided in a nondiscriminatory manner and that the opportunity for full and fair participation is offered to **FIRST CHANCE CENTER’s** riders and other community members. Additionally, through this program, **FIRST CHANCE CENTER** 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 **FIRST CHANCE CENTER** 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 **FIRST CHANCE CENTER’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), **FIRST CHANCE CENTER** 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 **FIRST CHANCE CENTER**'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.
- ◆ Planned changes in services, facilities, and policy must not result in discrimination against any segment of the community. Service and facilities planning must take into consideration the potential impact on minority populations. Minority and non-minority communities should be served with relative equity. Service cuts should not result in a relatively higher loss of service for minority communities, while service expansions should serve minority communities as well as non-minority communities.

II. GENERAL REQUIREMENTS

Notice to the Public

To make **FIRST CHANCE CENTER** riders aware of its commitment to Title VI compliance, and their right to file a civil rights complaint, **FIRST CHANCE CENTER** has presented the following information on its agency website, public areas of the agency office, inside vehicles, and rider guides.

Your Civil Rights

***FIRST CHANCE CENTER** 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 **FIRST CHANCE CENTER**. For more information on **FIRST CHANCE CENTER**'s civil rights program and the procedures to file a complaint, please contact **ORANGE COUNTY TRANSIT** at 812-723-4043; email cmattingly@firstchancecenter.com or visit our administrative office at **ORANGE COUNTY TRANSIT 986 West Hospital Road, Paoli** from **ORANGE COUNTY TRANSIT**'s 8 a.m.-4 p.m.. 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 **FIRST CHANCE CENTER** programs and services, visit www.firstchancecenter.com. If information is needed in another language, please contact [Crystal Mattingly](mailto:Crystal.Mattingly@firstchancecenter.com) at 812-723-4043.*

Discrimination Complaint Procedures

FIRST CHANCE CENTER 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 **FIRST CHANCE CENTER** may file a Title VI complaint by completing and submitting the agency's Title VI Complaint available at our administrative offices or on our website www.firstchancecenter.com.

FIRST CHANCE CENTER will notify NHDOT of all formal complaints within five business days of receiving the complaint.

Title VI Complaint Form
First Chance Center Services:
(OCTS and First Chance Center Specialized Services)

First Chance Center Title VI Complaint Procedure is made available in the following locations: *(check all that apply)*

- Agency website, either as a reference in the Notice to Public or in its entirety
- Hard copy in the central office
- Available in appropriate languages for LEP populations, meeting the Safe Harbor Threshold.
- Other, _____

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Electronic Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
Section II:				
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
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				
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 Title VI complaint with this agency?			Yes	No
Section V				
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:	
Section VI	
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:

 Printed Name

 Signature Date

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

Crystal Mattingly
 Orange County Transit Services
 986 West Hospital Road
 P.O. Box 267
 Paoli, IN 47454

The Procedure

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by First Chance Center may file a Title VI complaint by completing and submitting the agency's Title VI Complaint.

Methods of filing a complaint:

Complete the Complaint Form, and send it to:

Orange County Transit Services, P.O. Box 267, Paoli, IN 47454

Verbal complaints are accepted and transcribed by **Crystal Mattingly**. To make a verbal complaint, call 812-723-4043 and ask for **the transportation director Crystal Mattingly**.

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

FIRST CHANCE CENTER has up to **30 days** to investigate the complaint. If more information is needed to resolve the case, the **FIRST CHANCE CENTER** may contact the complainant. The complainant has 30 days from the date of the letter to send requested information to the investigator assigned to the case.

If **FIRST CHANCE CENTER's** investigator is not contacted by the complainant or does not receive the additional Information within thirty days, **FIRST CHANCE CENTER** 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 (2) 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 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, she/he has 10 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

FIRST CHANCE CENTER maintains a list of active investigations conducted by FTA and entities other than FTA, including lawsuits and complaints naming **FIRST CHANCE CENTER** 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 **FIRST CHANCE CENTER** 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. FIRST CHANCE CENTER’S PUBLIC PARTICIPATION PLAN

Key Principles

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

Through an open public process, **FIRST CHANCE CENTER** has developed a public participation plan to encourage and guide public involvement efforts and enhance access to **FIRST CHANCE CENTER**’s 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 **FIRST CHANCE CENTER** 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

The overarching goals of **FIRST CHANCE CENTER**'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 – **FIRST CHANCE CENTER** 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 – **FIRST CHANCE CENTER** develops and maintains partnerships with communities through the methods described in its public participation plan.
- Quality Input and Participation - That comments received by **FIRST CHANCE CENTER** are useful, relevant and constructive, contributing to better plans, projects, strategies and decisions.

Objectives of the Public Participation Plan

FIRST CHANCE CENTER'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 – **FIRST CHANCE CENTER** will proactively reach out to and engage low income, minority and LEP populations from the **FIRST CHANCE CENTER** 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 – **FIRST CHANCE CENTER** 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.

FIRST CHANCE CENTER 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, **FIRST CHANCE CENTER** will post service change notices on the First Chance Center website and appropriate buses and stops 45 days in advance of the change date.

IV. FIRST CHANCE CENTER’S PUBLIC PARTICIPATION PROCESS

Outreach Efforts – Alerting Riders and Encouraging Engagement

FIRST CHANCE CENTER’S PPP includes many new mediums extending beyond the traditional approach which relied on legal notices and intermittent media coverage. While **FIRST CHANCE CENTER** maintains these elements to its outreach program along with traditional seat-drop flyers, **FIRST CHANCE CENTER** 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 **by First Chance Center’s management team detailed later in this program, will review all service change proposals;**
3. Proposals are reviewed by First Chance Center’s Transportation Advisory Committee (TAC);
4. A Title VI review of the proposal is conducted;
5. If required, authorization from the First Chance Center 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 **First Chance Center** service area;

7. Bilingual (**English and Spanish**) public outreach materials are available upon request.
8. Outreach in advance of public information sessions is released (using tool-box of mediums listed below);
 1. An Email is transmitted to **FIRST CHANCE CENTER** community partners;
 2. Local radio station(s) **WUME, Q-100** interviews may be conducted (if available);
 3. The public comment period ends;
 4. **First Chance Center Board of Directors reviews proposal and recommendation presented in the board packet**;
 5. The final service/fare change date is set;
 6. Outreach is conducted in advance of any service or fare change;
 7. Bilingual system timetable and website updated in advance of the proposed change.

Selection of Meeting Locations

When determining locations and schedules for public meetings, **FIRST CHANCE CENTER** will:

- Schedule meetings at times and locations that are convenient and accessible for minority and LEP communities;
- 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 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.

FIRST CHANCE CENTER Mediums

- Print – Newspapers
- Website – www.firstchancecenter.com
- Social Media – FIRST CHANCE CENTER has used Facebook (1,418 fans) since 2014 to help engage community
- On-board Flyers – FIRST CHANCE CENTER regularly uses flyers to provide riders with details of service changes and schedules of public meetings.
- Public Hearings
- Legal Notices

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 **FIRST CHANCE CENTER** 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, **FIRST CHANCE CENTER** has assembled a listing of stakeholders with whom we regularly communicate through email and direct mail. A complete list of **FIRST CHANCE CENTER**'s community stakeholders can be obtained by contacting **FIRST CHANCE CENTER**.

Stakeholder List

Any community organization or person can be added to the **FIRST CHANCE CENTER** stakeholder list and receive regular communications regarding service changes by contacting the **FIRST CHANCE CENTER** administrative office at [**FIRST CHANCE CENTER 812-723-4486**]. Local organizations and businesses can also request that a speaker from **FIRST CHANCE CENTER** attend their regular meeting at the same number or through the **FIRST CHANCE CENTER** website www.firstchancecenter.com.

V. DECISION MAKING BODIES

Non-Elected Committees and Councils

At **FIRST CHANCE CENTER**, decisions regarding policy, service changes, fares, capital programming and facility locations are made by First Chance Center's Board of Directors. **FIRST CHANCE CENTER**'s **Board** is composed of 11 members representing Orleans, Paoli, West Baden and French Lick in Orange County. **FIRST CHANCE CENTER** also has an internal group known as the **Management Team**, and an external group known as the Transportation Advisory Committee (TAC) who hold quarterly meetings to help to guide decisions regarding routes, schedules, and other topics important to the community and our riders. Meetings of the **ORANGE COUNTY TRANSIT Board of Commissioners** and the **Transportation Advisory Committee** are always open to the public. TAC meetings are currently held at First Chance Center or via Zoom. Facebook and fliers on vans are used to advertise the meetings.

Management Team

This employee-based internal committee is comprised of the Executive Director, Program Coordinator, Director of Development, Transportation Director, Fiscal Specialist, Administrative Assistant, Day Services Director, Human Resource Associate, and FCC Industries Director.

It meets regularly to discuss possible service modifications from the perspective of Operators.

Transportation Advisory Committee (TAC)

This committee is open to the public and comprised of passengers and community leaders representing various towns in the county.

At the quarterly meetings, members discuss all aspects of FIRST CHANCE CENTER’s services from the perspective of the public. This group offers an invaluable service to FIRST CHANCE CENTER.

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. This group has been meeting for 25 years. Presently there are 8 members.

Body	Caucasian	Black or African American	Hispanic or Latino	Asian	American Indian or Alaska Native
Orange Co. Population	96.8%	1.7%	1.8%	.4%	.4%
FCC Board of Directors	100%	0%	0%	0%	0%
Transportation Advisory Committee	100%	0%	0%	0%	0%
Management Team	100%	0%	0%	0%	0%

VII. SUMMARY OF CHANGES

Service Change Evaluations Since September 5, 2020

Since FIRST CHANCE CENTER’s 2013 Title VI Plan Submission there have been no changes in FIRST CHANCE CENTER’s fare structure. There have been no service changes.

These changes, the associated outreach and Title VI determination and FIRST CHANCE CENTER Board Approval are available by contacting FIRST CHANCE CENTER.

Program Specific Requirements

Title VI Monitoring (from September 5, 2020 Title VI Plan)

The results of the ongoing monitoring of service standards as defined in the FIRST CHANCE CENTER’s September 5, 2020 program can be obtained by contacting FIRST CHANCE CENTER.

Subrecipient Compliance

FIRST CHANCE CENTER does not have any interaction with any sub-recipients

Equity Analysis for Facility

Orange County Transit’s office area and dispatching area were remodeled in 2018

Demographic Service Profile

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

VIII. GRANTS, REVIEWS AND CERTIFICATIONS

Pending Applications for Financial Assistance

First Chance Center is currently in the process of a 5311 operating/5339 capital CY 2024 application. The status of the application review is not complete.

Civil Rights Compliance Reviews in the Past 3 Years

The Indiana Department of Transportation (INDOT) reviewed and approved our plan on Feb. 26, 2019. The approval is in effect from 8/15/2018-8/15/2021

Recent Annual Certifications and Assurances

FIRST CHANCE CENTER executed its most recent Certifications and Assurances to the FTA in January, 2022 and is in the process of executing 2023 certifications and assurances.

Contact

For additional information on the FIRST CHANCE CENTER 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:

Crystal Mattingly 812-723-4043, (TTY 812-723-4486) cmattingly@firstchancecenter.com

IX. LANGUAGE ASSISTANCE PLAN

Improving Access for People with Limited English Proficiency (LEP)

In order to ensure meaningful access to programs and activities, FIRST CHANCE CENTER uses the information obtained in a Four Factor Analysis to determine the specific language services that are appropriate. This analysis helps FIRST CHANCE CENTER 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 FIRST CHANCE CENTER;
2. The frequency with which LEP persons come into contact with FIRST CHANCE CENTER services and programs;
3. The nature and importance of FIRST CHANCE CENTER's services and programs in people's lives; and
4. The resources available to FIRST CHANCE CENTER 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 FIRST CHANCE CENTER'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, FIRST CHANCE CENTER 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 (April 1, 2010-July 1, 2019). Data was reviewed by FIRST CHANCE CENTER’s management team in its entirety.

The Safe Harbor Threshold is calculated by dividing the population estimate for a language group that “speaks English less than very well” by the total population of the county. The LEP Safe Harbor Threshold provision stipulates that for each LEP group that meets the LEP language threshold (5% or 1,000 individuals, whichever is less), as the statistics show below, OCTS is not required to provide written translation of vital documents in these languages in written format for non-English speaking persons.

Service Area Overview

FIRST CHANCE CENTER’s service area encompasses approximately 400 square miles of Orange County and is home to a population speaking more than two different languages. Of the total service area population, of 19,867, 0.9% 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 0.1% to 0.5% of the total service area population.

Speak English “Less than very well”	Population in the Language Group	Percent of Total Population
Spanish	63	0.3%
Other Indo-European Languages	99	0.5%
Asian	11	0.1%
Other Languages	0	0.0%

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.”

Since % of LEP is under 1%, a map is not available to illustrate the population densities of where individuals speak English “Less than Very Well”

Factor 2 – Frequency of LEP Use

There are many places where FIRST CHANCE CENTER riders and members of the LEP population can come into contact with FIRST CHANCE CENTER services including the use of demand response buses, calls to customer service representatives, reservation agents and FIRST CHANCE CENTER’s outreach materials. An important part of the development of FIRST CHANCE CENTER’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 **FIRST CHANCE CENTER**'s customer service staff;
- Printed outreach materials;
- Web-based outreach materials;
- Public meetings;
- Demand response reservation agents;
- Local news media (print and radio);

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

Method of Interaction	Percent of Responses
Telephone	50%
Face to Face	100%
Email	0%
Fax	0%

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

Frequency of Interaction	Percent of Responses
Often	0%
Sometimes	25%
Rarely	50%
Never	25%

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

Language	Percent of Interactions
Asian	25%
Indo-European	13%
Other (uncertain of the language)	25%

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

Effectiveness	Percent of Total Responses
Very Effective	12%
Moderately Effective	38%
Less Effective	25%

Unable to Communicate	25%
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Community Partners

FIRST CHANCE CENTER 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?

Information on survey of partners or potential partners: The survey was sent through survey monkey and the survey was anonymous: Received 3 surveys back.

<u>Question</u>	<u>Partner Name (1)</u>	<u>Partner Name (2)</u>	<u>Partner Name (3)</u>
Do you encounter non-English speaking/reading people who need your services?	<u>No</u>	<u>No</u>	<u>No</u>
If so, what are the top three languages that you encounter?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
How do you address language barriers?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
Do you find language to be a barrier in preventing you from providing service?	<u>No</u>	<u>No</u>	<u>No</u>

Consulting Directly with the LEP Population

In addition to the U.S. Census data, employee survey, and outreach to community partners, ORANGE COUNTY TRANSIT implemented a survey of its riders. A copy of the survey is attached in Appendix A.

Surveys are sent out in June and November to passengers. The Director of Development collects and compiles the information. A corrective action and/or improvement plan to be completed by the Associate Director to address issues, concerns and/or recommendations.

Factor 3 – The Importance of FIRST CHANCE CENTER Service to People’s Lives

Access to the services provided by FIRST CHANCE CENTER are critical to the lives of many in the service area. Many depend on FIRST CHANCE CENTER’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 American’s 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.

The survey has been updated to gather data reflecting trip purpose and 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 **FIRST CHANCE CENTER** 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 FIRST CHANCE CENTER vehicles named in this plan.

The **FIRST CHANCE CENTER** 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 **FIRST CHANCE CENTER**.

Any person who wants additional information on **FIRSTCHANCE CENTER**'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 **FIRST CHANCE CENTER** within 180 days of the date of the alleged discrimination.

To file a complaint contact Crystal Mattingly at **ORANGE COUNTY TRANSIT** at 812-723-4043, www.firstchancecenter.com or send a letter to P.O. Box 267, Paoli, IN 47454. A complaint may also be filed directly with the FTA, Office of Civil Rights, 1200 New Jersey Avenue SE, Washington DC 20590.

La compañía **FIRST CHANCE CENTER** 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 **FIRST CHANCE CENTER** dentro de los 180 días siguientes a la fecha de la supuesta discriminación.

Para presentar una queja al Crystal Mattingly at **ORANGE COUNTY TRANSIT**, llame al 812-723-4043, www.firstchancecenter.com, o escribe una carta y envía a P.O. Box 267, Paoli IN 47454. 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

Even though FIRST CHANCE CENTER meets safe harbor, FIRST CHANCE CENTER is always looking at ways to improve services. Therefore, FIRST CHANCE CENTER has committed resources to improving access to its services and programs for LEP persons.

Today FIRST CHANCE CENTER does not have bilingual information but goals have been incorporated in the outcome section of the plan (see outcome section).

To date, the costs associated with these efforts fit within the FIRST CHANCE CENTER'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", FIRST CHANCE CENTER 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 First Chance Center's website;
2. Compiling community contact list for translation services if/when the need may arise (starting with Spanish translators);
3. Bilingual English/Spanish Languages of the OCTS Brochures
4. Bilingual English/Spanish Languages of the OCTS Complaint Form; and
5. Research a user-friendly smart phone translation application.

The above items are in process and will be launched on [1/31/2022].

Additional recommendations gleaned from the internal staff survey include:

1. Provide educational Information or training for management on the topic of Title VI to gain a better understanding of the topic in order to implement the program.
2. Provide educational information on the topic of the LEP. As staff become more familiar with the topic then additional recommendations may be made for outcome.
3. Implement training program.

FIRST CHANCE CENTER 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 FIRST CHANCE CENTER's website; and
- ◆ Post Event Assessments (PEA)

Post-Event Assessments

Following service changes, fare increases and planning projects, the Director of Development 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

FIRST CHANCE CENTER conducts annual and new employee trainings 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. FIRST CHANCE CENTER also conducts training for office staff on how to use translation applications.

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

At orientation and annually thereafter, employees will participate. Employees will complete a quiz to measure competency on the the information presented

Translation of Vital Documents

Upon request, FIRST CHANCE CENTER will translate many vital documents into Spanish. The list of documents that are or will be translated is provided below:

- ◆ Civil Rights Complaint Form



APPENDIX A
ORANGE COUNTY TRANSIT SERVICES (OCTS)
PASSENGER SURVEY

STATEMENT	STRONGLY AGREE	SOMEWHAT AGREE	SOMEWHAT DISAGREE	STRONGLY DISAGREE	NOT APPLICABLE
I FEEL SAFE AND AM COMFORTABLE WHEN RIDING IN A OCTS VEHICLE					
MY DRIVER IS WELL GROOMED, COURTEOUS AND TREATS ME WITH RESPECT					
MY DRIVER DRIVES SAFELY AND OBEYS TRAFFIC LAWS					
OCTS VEHICLES ARE CLEAN AND WELL CARED FOR					
MY DRIVER ARRIVES WITHIN THE WINDOW OF TIME I WAS GIVEN BY DISPATCH					
THE OTHER PASSENGERS IN THE VEHICLE ARE RESPECTFUL AND FOLLOW OCTS RULES					
WHEN I CALL DISPATCH, I AM NOT PLACED ON HOLD OR GET A BUSY SIGNAL					
OCTS IS AVAILABLE WHEN I NEED THEM					
IF I HAVE CONCERNS REGARDING MY TRIPS, I KNOW WHO TO CONTACT TO RESOLVE MY ISSUES					
IF I HAD ISSUES, THEY WERE RESOLVED IN A TIMELY MANNER AND TO MY SATISFACTION					
THE COST FOR A TRIP IS REASONABLE					
I AM MADE AWARE OF LOCAL TRANSPORTATION ADVISORY COMMITTEE					

MEETINGS					
I HAVE BEEN OFFERED A BROCHURE WITH INFORMATION ON OCTS RULES, REGULATIONS AND INFORMATION					
I WOULD RECOMMEND OCTS TO A FRIEND OR FAMILY					
I FEEL THAT OCTS SERVICE IS ACCESSIBLE TO MEET MY NEEDS					

SURVEY CONTINUES ON THE BACK → → →

I USE OCTS SERVICES AT LEAST:	PLEASE CHECK ONE: <input type="checkbox"/> WEEKLY <input type="checkbox"/> BI-WEEKLY <input type="checkbox"/> MONTHLY <input type="checkbox"/> EVERY 3-6 MONTHS
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OTHER COMMENTS OR CONCERNS NOT ADDRESSED ON PAGE 1:

IF YOU DISAGREED WITH ANY OF THE STATEMENTS ON PAGE 1, PLEASE EXPLAIN:

TO ENSURE YOUR RESPONSES REMAIN ANONYMOUS, PLEASE ASK YOUR DRIVER FOR A SELF-ADDRESSED STAMPED ENVELOPE. IF YOU ARE UNABLE TO SEND/RECEIVE MAIL, YOU MAY CALL IN YOUR RESPONSES TO OUR MAIN OFFICE AT THE INFORMATION LISTED BELOW. YOU DO NOT HAVE TO GIVE YOUR NAME. JUST LET THE FRONT DESK KNOW THAT YOU WISH TO COMPLETE A VERBAL SURVEY AND ASK FOR THE PERSON LISTED BELOW



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