**Columbus Transit**

**Title VI Plan**

**2022-2024**

**Columbus City Transit Department**

**850 Lindsey Street**

**Columbus, IN 47201**

**Updated**

**2/9/2023**

**By**

**RLS & Associates, Inc.**

**City of Columbus – ColumBUS Transit**

|  |  |
| --- | --- |
| Adopted on: | September 1, 2015 |
| Adopted by: | Board of Public Works & Safety |
| Revised on: | January 9, 2023 |

*This policy is hereby adopted and signed by*:

**City of Columbus**

|  |  |
| --- | --- |
|  Name/Title: | Jim Lienhoop, Mayor |
| Signature: |  |

# Signed and accepted by the City of Columbus Board of Public Works & Safety this \_\_\_\_\_\_day of , 2023.

James D. Lienhoop, Mayor

Mary K. Ferdon, Member

John C. Pickett, Member

James D. Strietelmeier, Member

Brenda Sullivan, Member

Attested by:

Luann Welmer, Clerk-Treasurer

**Policy Statement**

The **ColumBUS** 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) and the U.S. Department of Transportation implementing regulations.

**Title VI Plan Elements**

The **ColumBUS’s** Title VI plan includes the following elements:

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| --- |
| 1. *Evidence of Policy Approval*
2. *Notice to the Public*
3. *Agency Information*
4. *Complaint Procedure*
5. *Complaint Form*
6. *Public Participation Plan*
7. *List of transit related Title VI Investigations, Complaints and Lawsuits*
8. *Minority Representation Table and Description*
9. *Language Assistance Plan*
10. *System-wide Service Standards and Policies*

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**Public Notification**

The **ColumBUS’s** Notice to the Public is as follows:

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| --- |
| Notifying the Public of Rights Under Title VI**ColumBUS TRANSIT****(City of Columbus)*** The **ColumBUS** operates its programs and services without regard to race, color, or 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 **ColumBUS**.

For more information on the **ColumBUS’s** civil rights program, and the procedures to file a complaint, contact:*Title VI Coordinator* *Elizabeth Rubio, Compliance Specialist**City of Columbus* *Columbus City Transit Department* *850 Lindsey Street**Columbus, IN 47201* *Phone: 812-376-2506**Email*: erubio@columbus.in.gov * A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

If information is needed in another language, contact 812-376-2506.Si necesita información en español, por favor de llamar al 812-376-2506 |

The **ColumBUS’s** Notice to the Public is posted in the following locations: (*check all that apply*)

* Agency website: [www.columbus.in.gov/columbus-transit/](http://www.columbus.in.gov/columbus-transit/)
* Public areas of the agency office (common area, public meeting rooms, etc.)
* Inside vehicles
* Published as a legal notice in the paper on 1/12/2023

**Spanish-language Title VI Notice**

**Estatuto VI: Aviso al Publico**

El sistema de transporte ***ColumBUS*** está comprometido a garantizar que ninguna persona sea excluida de utilizar o de que le sean negados los beneficios de estos servicios por motivo de raza, color o nacionalidad según lo establece el Estatuto VI de la Ley de Derechos Civiles de 1964 actualizada. El objetivo del transporte de ***ColumBUS*** es el de:

* Garantizar que el nivel y calidad del servicio de transporte sea otorgado sin importar la raza, color o nacionalidad.
* Promover la total y justa participación de todas las personas involucradas en la toma de decisiones sobre el sistema de transporte.
* Prevenir la negación, reducción, o la postergación de los beneficios relacionados a los programas y actividades que beneficien a grupos minoritarios o de bajos ingresos.
* Asegurar que las personas con bajo nivel de inglés tengan acceso adecuado a los programas y actividades.

El sistema de transporte ***ColumBUS*** está comprometido con una política de no-discriminación en el manejo de su organización, incluyendo sus responsabilidades sobre el Estatuto VI y a proveer servicios de transporte público de una manera equitativa y accesible. Cualquier persona que sienta que él o ella han sido sujetos de actos de discriminación en base al Estatuto VI por motivo de raza, color o nacionalidad puede presentar una queja referente al Estatuto VI sobre el transporte público ***ColumBUS***. Dicha queja debe presentarse por escrito y entregarse al encargado del cumplimiento del Estatuto VI del sistema de transporte ***ColumBUS*** dentro de un plazo de ciento ochenta (180) días a partir de la fecha en que ocurrió el acto de discriminación.

Las quejas deberán presentarse por escrito y enviarse con atención a:

*Title VI Coordinator*

*Elizabeth Rubio, Compliance Specialist*

*City of Columbus*

*Columbus City Transit Department*

*850 Lindsey Street*

*Columbus, IN 47201*

*Phone: 812-376-2506*

*Email*: erubio@columbus.in.gov

Puede solicitar un formato de queja referente al Estatuto VI hablando a los teléfonos (812) 376-2506 o (812) 376-2570 y en www.columbus.in.gov.

**Agency Information**

City of Columbus operates "ColumBUS" public transit system as a fixed route service, and "Call-a-bus" demand response shared ride service for those persons who because of a disability are unable to access the Fixed Route System. ColumBUS service is provided on four routes on one hour headways. Columbus now operates five buses in fixed route service (added a new route in 2015) and four buses in Call-a-bus service. All of the buses are equipped with wheelchair lifts. Fixed Route and Call-a-bus service hours are from 6:00 a.m. to 8:00 p.m. Monday thru Friday and 6:00 to 6:00 on Saturdays. The fare for ColumBUS service is 25¢ for all riders. Discount, “half fare” rides for Medicare card holders and disabled citizens is .10₵. The fare for Call-a-bus service is 50¢ per trip. Easy Rider “free” passes are available for students up to the age of 18 or their graduation date.

**Report/Plan Statement**

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

The City of Columbus is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI of the Civil Rights Act of 1964 and in Federal Transit Administration (FTA) Circular 4702.1B. This plan was developed to guide the City of Columbus in its administration and management of Title VI-related activities.

*Title VI Coordinator*

*Elizabeth Rubio, Compliance Specialist*

*City of Columbus*

*Columbus City Transit Department*

*850 Lindsey Street*

*Columbus, IN 47201*

*Phone: 812-376-2506*

*Email*: erubio@columbus.in.gov

**Title VI Complaint Procedures**

The complainant may file a signed, written complaint with the transit system. Procedures are found in Appendix 1. The complaint should include the following information:

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

The complaint procedural process is included in Appendix 1. The Title VI Complaint Form (see Appendix 2) may be used to submit the complaint information. The complaint may be filed in writing with ColumBUS at the following address:

*Title VI Coordinator*

*Elizabeth Rubio, Compliance Specialist*

*City of Columbus*

*Columbus City Transit Department*

*850 Lindsey Street*

*Columbus, IN 47201*

*Phone: 812-376-2506*

*Email*: erubio@columbus.in.gov

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

**Active lawsuits or complaints**

All Section 5307 Transit Systems shall prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin:

* Active investigations conducted by FTA and entities other than FTA;
* Lawsuits; and
* Complaints naming the Small Urban Transit System and/or Section 5311 Subrecipient.

Appendix 3 is listing by year of all information such as 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 the recipient in response, or final findings related to the investigation, lawsuit, or complaint.

A summary of all civil rights compliance review activities conducted in the last 3 years is also included in Appendix 3.

**Public Participation Plan**

Columbus transit utilizes a variety of methods and forums to solicit community participation. The following is a non-inclusive list:

**Transit Advisory Committee Meetings:** The Transit Advisory Committee, named the Columbus Transit Advisory Council, is a standing committee consisting of representatives of public transit, not-for-profit social services agencies that provide transportation services and users of both. The Transit Advisory Committee serves as a clearing house for issues related to public transportation as well as to increase the level of coordination amongst the member agencies. MPO Staff is a member and attendee of the Transit Advisory Committee.

The Transit Advisory Committee is one of the primary avenues for the MPO to collect information related to transportation needs of the traditionally underserved.

Members and participants in the Transit Advisory Committee include:

* ColumBUS Transit
* Administrative Resources association
* Developmental Services, Inc.
* Columbus / Bartholomew Planning Department
* Columbus Area Metropolitan Planning Organization
* Mill Race Center
* Columbus Department of Public Works
* 211
* Community Residents

**MPO Citizen Committees:** The MPO organizes citizen committees on an ad hoc basis to focus on specific planning issues. An example of this would be the 2006 Bicycle and Pedestrian Committee. This committee was charged with preparing the City of Columbus Bicycle and Pedestrian Plan. Members of committees include a mixture of elected officials, staff from various departments of the City of Columbus, members of interest groups, and interested citizens. Citizens interested in participating on future planning committees should contact MPO staff to let staff know what issues interest them. These meetings are also open to the public.

**Board of Public Works (BOW):** The BOW serves as the city’s public body for contract and policy changes. All meetings are open to the public and thus information is disseminated to the public through this forum.

**Local Newspaper:** The city uses the newspaper for many of its notices and advertising to notify of capital projects or any change in service changes. A notice of plan has been published in the paper of local circulation.

**City Website:** The city website contains a page dedicated to transit. The webpage is used to inform the community of transit services and any program or policy changes.

**School Outreach:** ColumBus Transit conducts school outreach seminars for elementary, middle and high schools to promote, educate and determine needs of school aged children.

**Surveys:** ColumBus Transit deploys surveys to determine the needs of minorities and LEP populations.

**Community Events:** ColumBus Transit participates in several community outreach events to promote, educate and determine the needs of minorities and LEP populations.

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**Note: Title VI Notice to the public (included above) was posted to the website, at city hall, at the transit facility, and inside the transit vehicles.**

To promote inclusive public participation, the **ColumBUS** will use its resources available to employ the following strategies, as appropriate:

* Provide for early, frequent and continuous engagement by the public.
* Expand traditional outreach methods. Think outside the box: go to hair salons, barbershops, street fairs, faith-based institutions, libraries, etc.
* Select accessible and varied meeting locations and times
* Employ different meeting sizes and formats
* Provide childcare and food during meetings, if possible.
* Use social media in addition to other resources as a way to gain public involvement
* Use radio, television or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations may also include audio programming available on podcasts.

**Public Outreach Activities Completed Since Last Plan Update**

|  |  |  |
| --- | --- | --- |
| **Date** | **Activity/Event** | **Outreach Method** |
| **5/21/22** | **Block Party** | **In Person Engagement** |
| **8/14/22** | **LEP School Outreach** | **In Person Engagement** |
| **8/31/22** | **Public Survey** | **Digital and Printed QR Code** |
| **10/5/22** | **Touch-A-Truck** | **In Person Engagement** |

**Limited English Proficiency Programs/Language Assistance Plan**

LEP program activities and the Language Assistance Plan are included in Appendix 4.

**Non-Elected Committees and Boards Matrix**

Columbus Transit Advisory Council and Board of Public Works are the only transit-related, non-elected planning boards, advisory councils or committees, or similar bodies, where the membership is selected by the Transit System or the City. The following documentation depicts the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees or councils.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Body** | **White** | **Black or African American** | **Asian** | **American Indian or Alaska Native** | **Other Race Alone** | **Two or More Races** | **Hispanic or Latino** |
| **\*Population** | 74.4% | 3.1% | 10.4% | 0.3% | 4.8% | 6.9% | 9.6% |
| **Board of Public Works** | 100% | 0% | 0% | 0% | 0% | 0% | 0% |
| **Columbus Transit Advisory Council**  | 100% | 0% | 0% | 0% | 0% | 0% | 0% |
| *\*Source: 2020 U.S. Decennial Census Redistricting Data found [here](https://data.census.gov/cedsci/table?g=1600000US1814734&tid=DECENNIALPL2020.P1).*  |

The small rural nature of the community makes diversity of these boards difficult. However, the Transit system does make a genuine effort to diversify their board and committees. Columbus Transit Advisory Council encourages TAC organizations to appoint representatives that are consistent with demographic make-up of the community.

**Assurance:**

A signed FTA Civil Rights Assurance that all of the records and other information required under this circular have been or will be compiled, as appropriate, and maintained by the applicant, recipient, or subrecipient. In the case of State administered programs, this assurance should be provided by the primary and subrecipient [see Attachment I]. A signed standard DOT Title VI Assurance. This assurance will be maintained as part of the FTA “One-Time Submission” file. [see Attachment II].

**Subrecipients**

ColumBus transit does not utilize subrecipients.

**Equity analysts to Determine Site or Location of Facilities**

This does not apply to ColumBUS Transit as no such projects were conducted during the reporting period.

**Fixed Route Service Standards and Policies**

All fixed route transit provider service standards and policies are included in Appendix 6.

**Appendix 1 – Title VI Complaint Procedure**

The **ColumBUS’s** Title VI Complaint Procedure is made available in the following locations:

* Agency website: [www.columbus.in.gov/columbus-transit/](http://www.columbus.in.gov/columbus-transit/)
* Hard copy in the central office
* Available in appropriate languages for LEP populations, meeting the Safe Harbor Threshold.

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the **ColumBUS** may file a Title VI complaint by completing and submitting the agency’s Discrimination Complaint Form. The **ColumBUS** investigates complaints received no more than 180 days after the alleged incident. The **ColumBUS** will process complaints that are complete.

Once the complaint is received, the **ColumBUS** will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

The **ColumBUS** has **60** days to investigate the complaint. If more information is needed to resolve the case, the city may contact the complainant.

The complainant has **7** 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 **30** business days, the city 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, she/he 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, 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 FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

If information is needed in another language, then contact *812-376-2506.*

**Appendix 2 - Discrimination Complaint Form**

The **ColumBUS’s** Discrimination Complaint Form is made available in the following locations: (*check all that apply*)

* Agency website: [www.columbus.in.gov/columbus-transit/](http://www.columbus.in.gov/columbus-transit/)
* Hard copy in the central office
* Available in appropriate languages for LEP populations, meeting the Safe Harbor Threshold.

|  |
| --- |
| **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): Title VI: [ ] Race [ ] Color [ ] National Origin Other: [ ] Sex [ ] Age [ ] Gender Identity [ ] Sexual Orientation[ ] Religion [ ] Low IncomeDate 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? [ ] Yes [ ] NoIf 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: |
| 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:

*Title VI Coordinator*

*Elizabeth Rubio, Compliance Specialist*

*City of Columbus*

*Columbus City Transit Department*

*850 Lindsey Street*

*Columbus, IN 47201*

*Phone: 812-376-2506*

*Email*: erubio@columbus.in.gov

# **Estatuto VI**

# **Formato de queja**

**Sección I**

Nombre:

Dirección: Numero Calle Ciudad Estado C.P.

Teléfonos:

Casa: Trabajo: Otro:

Correo electrónico:

¿Requiere de un formato accesible?

Letra Grande: Si

No

Audio Casete: Si

No

TDD: Si

No

Otro:

La Agencia de Derechos Civiles de la Oficina de Administración de Transporte es responsable de monitorear y cumplir con los derechos civiles lo cual incluye el asegurarse de que los proveedores de transporte público acaten adecuadamente el Estatuto VI de la Ley de Derechos Civiles de 1964., Orden Ejecutiva 12898, “Acciones Federales para tratar la Justicia ambiental en grupos minoritarios y de bajos ingresos”, y de la Guía del Departamento de Transporte para los que reciben servicios de lenguaje especiales particularmente para los beneficiarios con bajo nivel de Inglés.

# **Sección II:**

¿Está usted llenando esta queja para usted mismo? Si (Si responde “si” a esta pregunta, pase a la Sección III)

No

Si no, por favor anote el nombre y parentesco con la persona para quien está presentando esta queja:

Nombre: Parentesco:

Por favor explique la razón por la que usted está presentando esta queja para una tercera

persona.

Por favor corrobore que usted ha obtenido el permiso de la parte agraviada en caso de que usted esté presentando la queja a favor de una tercera persona.

Si No .

# **Sección III:**

Creo que la discriminación que experimenté se basó en (marcar todos los que apliquen):

Estatuto VI: [ ]  Raza [ ]  Color [ ]  Nacionalidad

Otro: [ ]  Sexo [ ]  Edad [ ]  Identidad de Género [ ]  Orientación Sexual

 [ ]  Religión [ ]  Bajos Ingresos

Fecha de la presunta discriminación (mes, día, año):

Explique lo más claramente posible lo que sucedió y por qué cree que fue discriminado. Describa a todas las personas involucradas. Incluya el nombre y la información de contacto de la persona(s) que lo discriminó (si se conoce), así como los nombres y la información de contacto de cualquier testigo. Si necesita más espacio, por favor use el reverso de este formulario.

# **Sección IV:**

¿Ha presentado una queja anteriormente acerca del Estatuto VI sobre el transporte *ColumBUS*?

Si No

Si “si”, ¿Cuál fue el número de queja sobre el transporte *ColumBUS*?

(Nota: Esta información es necesaria para propósitos administrativos. Asignaremos el mismo número de queja a la nueva queja.)

# **Sección V:**

¿Ha presentado esta queja con alguna de las siguientes agencias? Si No\_\_\_\_\_\_\_

(Si su respuesta es “si”, ¿Con quién presentó la queja?)

Agencia Federal:

Corte Federal:

Corte Estatal:

Agencia Estatal:

Agencia Local:

¿Ha presentado una demanda referente a esta queja? Si No

Si “si”, por favor proporcione una copia del formato de la queja. (Nota: La información proporcionada anteriormente es de mucha ayuda para propósitos de seguimiento administrativo. Sin embargo, si existe una demanda en curso sobre el mismo asunto, nosotros remitiremos la decisión al Tribunal.

**Sección VI:**

La queja es en contra de:

Persona de Contacto: Título:

Número Telefónico:

# Se anexa una hoja en blanco para que usted describa su queja. Por favor utilice hojas adicionales si es necesario.

Por favor firme aquí: Fecha:

# (Nota: No podemos aceptar su queja si no está firmada)

# Por favor envíe el formato lleno a:

*Title VI Coordinator*

*Elizabeth Rubio, Compliance Specialist*

*City of Columbus*

*Columbus City Transit Department*

*850 Lindsey Street*

*Columbus, IN 47201*

*Phone: 812-376-2506*

*Email*: erubio@columbus.in.gov

**DESCRIPCIÓN DE LA QUEJA**

**(Por favor incluya detalles específicos como nombres, fechas, horas, número de ruta, testigos y cualquier otra información que nos pueda ayudar en la investigación de su queja).**

**Appendix 3 – List of Transit Related Title VI Investigations, Complaints and Lawsuits**

|  |
| --- |
| **Check One:**  |
| **X** | There have been no Title VI investigations, complaint and/or lawsuits filed against us during the report period.  |
|  | There have been investigations, complaints and/or lawsuits filed against us. *See list below. Attach additional information as needed.*  |

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

**Appendix 4 - Language Assistance Plan (LAP)**

**Plan Components**

As a recipient of federal US DOT funding, the **ColumBUS** 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.

Most individuals in Indiana read, write, speak and understand English. There are some individuals for whom English is not their primary language. If these individuals have a limited ability to read, write, speak, or understand English, they are considered limited English proficient, or ‘‘LEP.’’

The **ColumBUS’s** Language Assistance Plan includes the following elements:

* The results of the *Four Factor Analysis*, including a description of the LEP population(s), served.
* A description of how language assistance services are provided by language
* A description of how LEP persons are informed of the availability of language assistance service
* A description of how the language assistance plan is monitored and updated
* A description of how employees are trained to provide language assistance to LEP persons
* Additional information deemed necessary

**Methodology**

To determine if an individual is entitled to language assistance and what specific services are appropriate, the **ColumBUS** has conducted a *Four Factor Analysis*[[1]](#footnote-1) of the following areas: 1) Demography, 2) Frequency, 3) Importance and 4) Resources and Costs.

LEP *Four Factor Analysis*

* **Factor 1: Demography**: What is the number or proportion of LEP persons served and the languages spoken in the service area?

*The City of Columbus utilized the US Census and American Community Survey (ACS) Data taken from the US Census Bureau’s pooled 2016-2020 American Community Surveys for the City. Based on this data, there are 2,278 persons LEP persons out of 45,160. This constitutes 5.04 percent (%) of the population of the City with the highest number of LEP language groups identified below. This table details that the City of Columbus does not meet the 1,000 or 5% LEP persons Safe Harbor threshold for any individual languages identified.*

**TABLE 1: Languages spoken by LEP Individuals in the City of Columbus**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Geography** | **Total Population** | **Spanish Speaking LEP Population** | **% of Total****Pop.** | **Chinese Speaking (including Mandarin & Cantonese) LEP Population** | **% of Total Pop.** |
| City of Columbus, IN | 45,160  | 634  | 1.4% | 392  | 0.9% |
| *Source: U.S. Census 2020 American Community Survey 5-Year Estimates found [here](https://data.census.gov/cedsci/table?q=C16001&g=1600000US1814734).*  |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
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* **Factor 2: Frequency**: How often does your staff come into contact with LEP persons?

*The frequency for LEP persons to come into contact with program Call-a-bus are the following areas:*

* *Demand response service - daily*
* *Purchase of passes, tokens or tickets through transit - daily*
* *Participation in public meetings – Monthly or Quarterly*
* *Customer service interactions - Daily*
* *Ridership surveys – Every other year*
* **Factor 3: Importance**: How does the program, service or activity affect people’s lives?

*The provision of public transportation is a vital service, especially for people without access to personal vehicles. Transit system activities will impact every person in the community. Development of a coordinated effort to meet the specific transportation needs of seniors and people with disabilities will often also meet the needs of LEP persons. A person who is LEP may have a disability that prevents the person from using fixed route service, thus making the person eligible for ADA complementary paratransit. The transit system assesses their programs, activities and services to ensure they are providing meaningful access to LEP persons. Facilitated meetings with LEP persons are one method to inform the recipient on what the local LEP population considers to be an essential service, as well as the most effective means to provide language assistance.*

* **Factor 4: Resources and Costs**: What funding and other resources are available for LEP outreach?

*Currently, the City of Columbus utilizes Aida Ramirez Human Rights Commission Director to provide Spanish language interpretation services as needed as well as other technical assistance to Columbus residents who need assistance with state and/or federal claims. Also, the City has a contract in place with Language Line to provide translation services as needed in any language. City staff are trained on how to connect with Language Line and operate a call between an interpreter who then provides information directly to LEP individuals in real time. Lastly, the City can contact the Su Casa Neighborhood Assistance Center, a United Way Agency in Bartholomew County that provides oral in-person and by-phone interpretation services. Su Casa provides program information, route maps, and transit brochures to inform them on transit. Su Casa typically does not charge for services or charges nominal fees to city as they are supported by volunteers and donors and provide programs, services and education to increase the self-sufficiency of members of the Latino Population and advocates cross cultural interaction within the community.*

*In addition, internet sites can be utilized to translate some written materials and local volunteers have been identified to provide other oral translation services at public meetings and during conversations with LEP residents during the implementation of the proposed project. Furthermore, many of the common forms used in the implementation of a FTA funded programs are available in multiple languages on the FTA, FHWA and DOL websites. Additionally, translation activities are an eligible 5307 administrative expense. Therefore, limited LEP measures are reasonable given the resources available to the City of Columbus.*

**Certification:** Based on the above Four-Factor Analysis, the City of Columbus is not required to provide translation of vital documents into LEP identified languages. However, the City of Columbus will make all reasonable attempts to accommodate language access needs of residents requesting oral translation during citizen participation activities. The city agrees to adhere to the Safe Harbor Provision as defined in Appendix 5.

#### **Public Dissemination of Language Assistance Services**

The ColumBUS informs the public, including LEP individuals, of the availability of language assistance services through the following means:

* Language assistance statement in the Title VI Notice to the Public in English and Spanish with the notice posted in all transit vehicles, transit offices, and the ColumBUS website;
* ColumBus Transit has Language Line Solutions poster located at the depot for language assistance.

#### **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;
* Annual review of translation services utilized with Language Line to track LEP encounters;
* Ongoing collaboration with regional partners;
* Ongoing review of Google Translate requests at **ColumBUS**’s website; and
* Post Event Assessments (PEA)

**Post-Event Assessments**

Following service changes, fare increases and planning projects, Transit Coordinator 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**

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

**Appendix 5 – Safe Harbor Provision**

The U.S. DOT has adopted the Department of Justice’s (DOJ’s) Safe Harbor Provision, which outlines circumstances that can provide a “safe harbor” for recipients regarding translation of written materials for LEP populations. The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient’s written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

These safe harbor provisions apply to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. A recipient may determine, based on the Four Factor Analysis, that even though a language group meets the threshold specified by the Safe Harbor Provision, written translation may not be an effective means to provide language assistance measures. For example, a recipient may determine that a large number of persons in that language group have low literacy skills in their native language and therefore require oral interpretation. In such cases, background documentation regarding the determination shall be provided to FTA in the Title VI Program.

# **Appendix 6 - Service Standards and Policies**

FTA requires **all fixed route** transit providers of public transportation to develop *quantitative* standards for the following indicators. Individual public transportation providers will set these standards; therefore, these standards will apply to each individual agency rather than across the entire transit industry.

**ColumBUS** has developed a set of quantifiable service standards and policies. These service standards were established in **2022** through a public participation process, approved by the City of Columbus Board of Public Works & Safety and with the input of the Columbus Transit Advisory Council to ensure the service standards and policies are in compliance with the Title VI of the Civil Rights Act of 1964 that protects people from discrimination based on race, color, and national origin in programs and activities receiving federal financial assistance.

These service standards and policies include:

* Vehicle Load
* Headways (Frequencies)
* On-time Performance (Schedule Adherence)
* Service Availability
* Vehicle Assignment Policy
* Transit Amenity Policy

Following the internal establishing of these policies and standards, **ColumBUS** advertised and held a public information session to receive comments on the proposed standards. During the session, **ColumBUS** staff presented an overview of the components of **ColumBUS’** public participation process as well as the various policies and standards.

### **Vehicle Load**

*Vehicle load for each mode*: Generally expressed as the ratio of passengers to the number of seats on a vehicle, relative to the vehicle’s maximum load point. For example, on a 40-seat bus, a vehicle load of 1.3 means all seats are filled and there are approximately 12 standees. Transit providers can specify vehicle loads for peak vs. off-peak times, and for different modes of transit.

Vehicle load is expressed as the ratio of passengers to the total number of seats on a vehicle.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Vehicle Type | Seated Capacity | Standing Capacity | Total Capacity | Average Load | Maximum Load |
| Gillig 29’ Lowfloor | 20 | 20 | 40 | 1.5 | 2 |
| Ford 20' | 8 | 4 | 12 | 1.5 | 2 |
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|   |   |   |   |   |   |
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### **Vehicle Headway (Frequency)**

*Vehicle headways for each mode*: The amount of time between two vehicles traveling in the same direction on a given line or combination of lines.

Vehicle headway is the amount of time between two buses traveling in the same direction on a given route. **ColumBUS** buses are scheduled with a variety of frequencies based generally on demand. Routes are scheduled in 60 minute frequencies. **ColumBUS** will also consider more frequent (20-min.) service where ridership levels warrant and funding levels permit and less frequent services where demand dictates.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Service/Mins | Weekday Peak | Weekday Off-Peak | Saturday Peak | Saturday Off-Peak |
| **ColumBUS** Local Service |  30 min. | 60 min. | 30 min. | 60 min. |
| Route 1 |   |  60 min. |   |  60 min. |
| Route 2 |   |  60 min. |   |  60 min. |
| Route 3 |   |  60 min. |   |  60 min. |
| Route 4 |   |  60 min. |   |  60 min. |
| Route 5 |   |  60 min. |   |  60 min. |

### **On-Time Performance**

*On-time performance for each mode:* A measure of runs completed as scheduled

Among the most important service standard for riders is on-time performance or adherence to published schedules.

* A vehicle is considered on time if it departs a scheduled time point no more than two minutes early and no more than 5 minutes late.
* **ColumBUS**’s on-time performance objective is **90%** or greater.

### **Service Availability – Access to the Bus**

*Service availability for each mode*: A general measure of the distribution of routes within an agency’s service area.

**ColumBUS** currently provides fixed route transit service so that **80%** of all residents of **Columbus** are within a 3/4 miles walk of bus service. Consideration is given to new markets as demand warrants and as resources become available.

### **Vehicle Assignment Policy**

With several practical considerations, **ColumBUS** assigns buses to service so that average age of the buses serving each route does not exceed the average age of the fleet. Bus assignments take into account the operating characteristics of buses of various lengths, which are matched to the operating characteristics of the route.

### **Transit Amenity Policy**

**ColumBUS** has over **100** stops in the service area.

Stops, shelters and benches will be placed according to industry standards (TCRP Report 19) with consideration of permitting and for local and special needs. The installation of new bus amenities can be requested through the customer service office, or at public meetings.

When the annual cost of repairs to any amenity (beyond the cost of normal cleaning) is greater than the cost of the structure, **ColumBUS** reserves the right to permanently remove the amenity.

1. [↑](#footnote-ref-1)