



Title VI Program

Recertification Document

Title VI of the 1964 Civil Rights Act, Section 601 Specific to Federal
Transit Administration Programs

December 7, 2023

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2023
Northwestern Indiana Regional Planning Commission
Title VI Program Certification Document

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Ty Warner AICP
Executive Director



RESOLUTION 23-14

December 7, 2023

A RESOLUTION OF THE NORTHWESTERN INDIANA REGIONAL PLANNING COMMISSION AUTHORIZING AND ADOPTING THE TITLE VI PROGRAM OF THE U.S. DEPARTMENT OF TRANSPORTATION UNDER PROVISION OF FTA CIRCULAR 4702.1b

WHEREAS, the U.S. Department of Transportation requires recipients of federal funding to comply with policies and regulations related to Title VI of the Civil Rights Act of 1964, as amended; and

WHEREAS, the Commission is a Direct Recipient of federal funding and is required to develop a Title VI Program and to report Title VI compliance to the Federal Transit Administration for the activities in which it is a Direct Recipient; and

WHEREAS, in compliance with Title VI non-discrimination laws, in regard to providing appropriate access to services and activities provided by federal agencies and recipients of federal assistance, the Northwestern Indiana Regional Planning Commission will ensure that individuals are not excluded from participation in, denied benefits of, or otherwise subjected to discrimination under any program or activity receiving federal financial assistance on the basis of race, color, national origin, age, sex, disability, religion, or language; and

WHEREAS, in compliance with Title VI non-discrimination laws, in regard to providing appropriate access to services and activities provided by federal agencies and recipients of federal assistance, the Limited English Proficiency requirement mandates that the Northwestern Indiana Regional Planning Commission accommodate persons with Limited English Proficiency,

NOW, THEREFORE, BE IT RESOLVED by the Northwestern Indiana Regional Planning Commission:

The Commission approves and submits the 2023 Title VI Program to the Federal Transit Administration and/or U.S. Department of Transportation in compliance with the Title VI of the Civil Rights Act of 1964, on behalf of the Northwestern Indiana Regional Planning Commission.

Duly adopted by the Northwestern Indiana Regional Planning Commission on this seventh day of December, 2023

Richard Hardaway
Chair

ATTEST:

Sue Lynch
Secretary

Identification of Designated Recipient, Direct Grantee, and Subrecipients

Recipient: Northwestern Indiana Regional Planning Commission (NIRPC)
6100 Southport Road, Portage, IN 46368-6409
FTA Grantee: 1193

Subrecipients:

City of East Chicago, IN (East Chicago Transit)
North Township, Lake County, IN (North Twp. Dial-a-Ride)
Lake County Community Services, Inc.
Opportunity Enterprises, Inc. (OE)
Porter County Aging & Community Services, Inc.
City of Valparaiso, IN (V-Line & ChicaGo Dash)
City of La Porte, IN (TransPorte)

NIRPC also functions as the cognizant Designated Recipient and executes supplemental agreements for the following transit operator, which is itself a direct grantee of Federal Transportation Administration (FTA) funds:

Northern Indiana Commuter Transportation District (NICTD)
(South Shore Commuter Rail)
FTA Grantee: 1201

NICTD will be submitting their own Title VI Certification to FTA. Please see their submitted document.

Part I. NIRPC General Reporting Requirements

The information contained in this report reflects the Title VI requirement per Federal Transit Administration (FTA) Circular 4702.1B of October 1, 2012. The Northwestern Indiana Regional Planning Commission (NIRPC) functions as a Metropolitan Planning Organization (MPO): FTA direct grantee that passes through funding to seven (7) different transit operators; and as the “cognizant” Designated Recipient for a commuter rail provider. As a recipient of FTA funds, NIRPC submits the following information under General Reporting Requirements of Chapter III of the Circular.

Requirement to Provide an Annual Title VI Certification and Assurances

The Northwestern Indiana Regional Planning Commission (NIRPC) submitted the FY 2022 Certifications and Assurances on TRAMS on February 18, 2022

Requirement to Develop Title VI Complaint Procedures

In 2010 NIRPC updated its Title VI complaints procedures. This update included the addition of a complaint form and was approved by the Indiana Department of Transportation (INDOT) in May of 2010. NIRPC’s Title VI Complaint Procedures (see *Attachment #1*) are posted on the bulletin board in NIRPC’s reception area and are available for the public to download from NIRPC’s website.

Requirement to Record Title VI Investigations, Complaints, & Lawsuits

NIRPC has no active lawsuits or complaints alleging discrimination on the basis of race, color, or national origin with respect to service or other transit benefits.

Requirement to Provide Meaningful Access to Limited English Proficiency (LEP) Persons

NIRPC’s Public Participation Plan was updated and adopted in August 2019. NIRPC receives federal financial assistance from the US Department of Transportation (US DOT). For this reason, it is subject to the US DOT’s Limited English Proficiency Guidance, issued on December 14, 2005. NIRPC has elected not to prepare a formal Limited English Proficiency (LEP) Plan. In 2020 NIRPC completed the LEP Four Factor Analysis (see *Attachments #2 & Attachment #3*). NIRPC has elected not to update the four-factor analysis at this time. This is due to the low number of LEP persons historically accessing NIRPC services, and the low frequency at which LEP persons encounter NIRPC’s services. NIRPC will update the four-factor analysis and revisit the possibility of creating a formal Limited English Proficiency Plan upon the release of more detailed data. The conclusions to the four-factor analysis have been updated to reflect the steps taken and the future steps that will be taken to expand NIRPC’s access to LEP populations (See *Attachment #3*).

Requirement to Notify Beneficiaries of Protection Under Title VI

NIRPC's Title VI Complaint Procedures (see *Attachment #1*) are posted on the bulletin board in NIRPC's reception area and are available for the public to download from NIRPC's website. NIRPC staff updated its Non-Discrimination Statement in 2010 to fulfill the INDOT ADA review. A Request for Alternate Formats statement was developed in 2010. It is NIRPC's policy to incorporate both the Non-Discrimination and Request for Alternate Format Statements into all public documents. Below are the Non-Discrimination and Request for Alternate Format Statements.

Non-Discrimination Statement

The Northwestern Indiana Regional Planning Commission (NIRPC) prohibits discrimination in all its programs and activities on the basis of race, color, sex, religion, national origin, age, disability, marital status, familial status, parental status, sexual orientation, genetic information, political beliefs, reprisal, or because all or part of an individual's income is derived from any public assistance program.

Request for Alternate Formats

Requests for alternate formats please contact Ann Weitgenant at NIRPC at (219)243-5945 or aweitgenant@nirpc.org. Individuals with hearing impairments may contact us through the Indiana relay 711 service by calling 711 or (800) 743-3333.

Public Participation Plan & Summary of Public Outreach and Involvement Activities

NIRPC's Public Participation Plan, *Engage NWI* was updated and adopted on August 15, 2019. *Engage NWI* is the federally required "Public Participation Plan" that enables Northwestern Indiana Regional Planning Commission (NIRPC) staff to ensure that it is meeting all federal requirements for public participation, but more importantly, a guide that enables the public to engage with regional planning.

Engage NWI promotes a meaningful exchange of ideas, identification of regional issues and solutions, as well as advancing initiatives to achieve the vision for Northwestern Indiana (NWI). Most importantly, through trial and error, *Engage NWI* provides a blueprint for methods that work for public engagement in a world that has moved on from traditional outreach methods – going beyond the traditional public meeting. Please see NIRPC's Public Participation Plan submitted along with this document as well as located on NIRPC's website.

Several steps have been taken since the Title VI submission in 2017 to ensure that the general public, including underrepresented communities, are involved in and have meaningful access to NIRPC activities and events. These steps include, but are not limited to:

- Adopting a new Public Participation Plan on August 15, 2019. The Plan includes many improvements, including how to engage with regional planning.
- Appointing a staff member as the Public Participation Planner to oversee the development and implementation of the Public Participation Plan as well as all agency outreach and engagement activities.
- Engaging in a large number of public workshops and public outreach events in multiple locations throughout the region. This includes organizing and attending events in underrepresented communities.

- Hosting public meetings, public hearings, out and abouts, open houses, pop-up events, and focus groups, throughout the region, including underrepresented communities, for *NWI 2050*, Coordinated Transit Plan, Transportation Improvement Program and *Engage NWI*.
- Broadcasting information regarding NIRPC activities and public involvement opportunities through radio, social media, newspaper, and television. This activity ranged from press releases to special appearances and feature articles. This includes monthly appearances on “Green Fleets,” a local radio show hosted by NIRPC planning partner South Shore Clean Cities.
- Posting NIRPC activities, information, publications and events on NIRPC’s website, weekly newsletter, and social media pages.
- NIRPC provides public notice through media notices, public service announcements, web site meeting calendar, and announcements at monthly policy board and stakeholder meetings. Notices of regularly scheduled meetings are sent out and posted at least 48 hours in advance. A notice is also sent prior to January for the entire year’s worth of meetings. Notices of formal public hearings are done 30 days in advance of the hearing.
- Providing alternatives formats and accommodations upon request at least 72 hours in advance of meetings and events.
- Releasing various draft plans, programs and other documents for public comment, following the guidelines as established in the 2019 Public Participation Plan.
- NIRPC has established a social media presence that includes Facebook, LinkedIn, Instagram, YouTube, and Twitter as additional tools for outreach and engagement.
- NIRPC launched a redesigned web page in January of 2017 to further improve upon the user experience.

In addition to the above steps, the following (Figure 1-4) is a summary of specific public outreach and involvement activities undertaken since the submission of the Title VI certification in 2017.

Figure 1: Agency Engagement Efforts Timeline 2018 – 2019

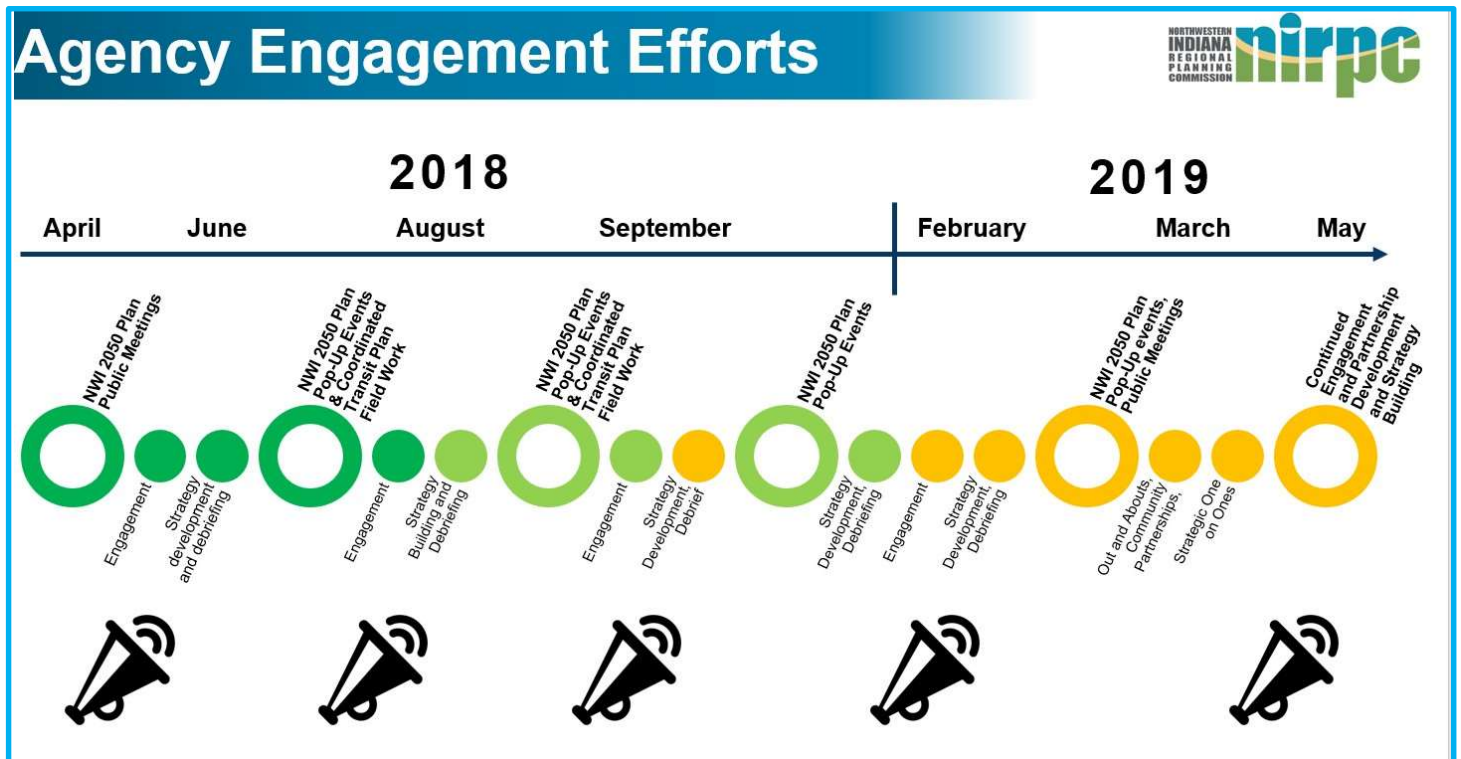


Figure 1 depicts the agency’s outreach and engagement efforts from 2018-2019 in regards to NWI 2050. Outreach activities began in April 2018 and concluded in May 2019 with the adoption of the new plan. There were four engagement periods that took place to obtain feedback from the public.

Figure 2: NWI 2050 Plan Outreach & Engagement Summary



Figure 2 describes the traditional and non-traditional outreach and engagement methods that took place during the NWI 2050 process, such as: public meetings and hearings, out and abouts, and pop-up events.

As part of NWI 2050+, an update to the MTP (NWI 2050), NIRPC undertook public participation processes which consisted of the following:

Open Houses: NIRPC staff kicked off the public engagement phase of NWI 2050+ with three open houses in June of 2022, one in each of the counties of the region.

Website: NIRPC created an NWI 2050+ page on NIRPC's website (Figure 1-2). People with access to the Internet were able to read, comment, and see the results. In addition, NIRPC staff created a comments map using Socialpinpoint. Comments could be added to the map by clicking on an icon at the top of the screen, dragging it to the desired position on the map, and providing a comment on the card appearing on the screen (Figure 1-3). The map included three categories of icons as inputs

- Active transportation (biking and pedestrian)
- Transit (freight, trains, buses)
- Land use (development, housing, commercial)

This mapping exercise helped the planning team focus on drafting concerns and priorities.

Brochure: NIRPC distributed a brochure for NWI 2050+ to encourage people to participate in the planning process online through the comments map, and a survey, which helped NIRPC to identify issues, needs, and priorities to shape the future of Northwest Indiana (Figure 1-4). The brochure included a QR code which could be scanned to access the survey.

Survey: NIRPC developed an online survey seeking input from the public about their concerns and ideas for a future that's Connected, Renewed, United, and Vibrant into 2050. The survey included questions covering the plan elements and was supported by visual graphics and pictures to help people visualize their preferences for future development.

Social Media: NIRPC continuously updated the public about all opportunities to engage with plan feedback via their social media platforms: Twitter, Facebook, LinkedIn, Instagram, and YouTube.

County Fairs: In the summer of 2022, NIRPC staff set up a booth at each of the three county fairs to inform the public about the plan development process and receive input. This was the first time NIRPC had space at a county fair for their long-range plan public engagement process. Staff was present every day at the LaPorte County Fair from July 9th to 16th, the Porter County Fair from July 23rd to July 31st, and the Lake County Fair from August 5th to August 14th. NIRPC staff worked two three-hour shifts during the weekdays and three three-hour shifts on the weekends. In all, staff worked over 400 hours during all three fairs, and distributed over 2,000 brochures while engaging with over 500 people directly.

At each fair, staff set up a large aerial map of the entire three-county NIRPC region. This enabled county fair attendees to point out where they lived and for NIRPC staff to talk in detail about the importance of the planning effort to their quality of lives. The vast majority of those engaged had never heard of NIRPC. Staff directed people to take the online survey via the brochure, which had a direct impact on the number of overall respondents. Participants at the county fair exhibits also were given the opportunity to submit written comments on note cards. These comments, along with those received through the online survey, were received for information and were taken into consideration as the plan was developed.

Additionally, staff facilitated an interactive game for elementary school children to learn about the concept of the 15-minute neighborhood. Staff developed worksheets for every elementary school in the region and asked children from these schools to review their school grounds and the surrounding area and brainstorm ideas to make them more walkable and bikeable. In this exercise children learned how coordinated land use and transportation planning can improve safety.

Youth Outreach: In November of 2022 NIRPC staff was invited to the NWI Boys and Girls Club in Gary to work with youth on the aspects of the plan development. Staff prepared a “pop-up event” for the club members, and during the visit different boards highlighting aspects of the plan were shown and feedback elicited by the youth present.

Other Outreach: Staff attended a Juneteenth Event in Merrillville to review plan specifics with participants and receive feedback.

Figure 3: Coordinated Transit Plan Outreach & Engagement Summary



Figure 3 describes the outreach and engagement activities of the Coordinated Transit Plan which took place in the Fall of 2018. The Coordinated Transit Plan utilized outreach methods such as traditional public meetings, field work, committee meetings, and a survey.

Figure 4: Engage NWI, Public Participation Plan Outreach & Engagement Summary



Figure 4 describes the process of the development and implementation of *Engage NWI*, the adopted Public Participation Plan.

Additional opportunities to engage with NIRPC to provide input and feedback on plans and programs were also available via the NIRPC website via the public comment opportunities section located here:

<https://nirpc.org/people-and-leaders/public-participation/>

Environmental Public Outreach

NIRPC's Environmental Department provides public education as part of its air quality programming. To promote cleaner air throughout the region the Environmental Department assists partners to promote the annual Partners for Clean Air Award Luncheon and Asthma Awareness Day at Gary RailCats baseball games. The luncheon is open to the public and NIRPC distributes free tickets at the baseball games and health clinics throughout the region, with a focus on those in the urban and minority communities. In 2017, a regional air quality and transit campaign was conducted by NIRPC to encourage modal shifts.

An air quality study was completed for NIRPC in 2017 to determine Northwest Indiana residents' knowledge of air quality issues, the relative importance they place on air quality, their sources of information about air quality, and their awareness of and opinions on specific air quality campaigns. The study entailed a statistically representative telephone survey of Northwest Indiana residents as well as two focus groups in Merrillville and Valparaiso. This information has been used to guide public outreach efforts.

Air quality public outreach is also done by NIRPC at community and partner events throughout the year. Additionally, NIRPC purchases billboard, newspaper, and radio space to educate the public on air quality and to promote events. This has included space in Que Viva, Northwest Indiana's Spanish speaking newspaper. NIRPC maintains air quality outreach materials on its website including materials that have been translated to Spanish.

Minority Representation on Planning and Advisory Bodies

In order to determine minority representation on NIRPC boards and committees; staff developed a voluntary survey to distribute to NIRPC leadership. This survey was distributed in November 2023.

The survey asked three questions: 1) The respondent's name. Participants were informed that their data would remain anonymous. Their name only be used to establish who has taken the survey, and who still needs to complete it. 2) Their racial or ethnic identification. The categories provided were identified from the Association of Institutional Research. Additionally, the categories were shared with the 2010 Census and American Community Survey, so that respondents' answers could be quantified against regional trends. 3) Lastly, respondents were asked to indicate what committees they served on and the year of their service. This question's answers pertained to NIRPC's Commission and Executive Board; Finance and Personnel Committee; Legislative Committee; Local Government Assistance Committee; Outreach Committee; Technical Planning Committee (TPC); and five TPC subcommittees; and if the individual served in 2020, 2021, 2022, or 2023.

Membership on the NIRPC Board is made under the NIRPC Enabling Legislation (*P.L.165-2003, and as amended by P.L. 2-2007*) that states the following:
IC 36-7-7.6-4

Commission Membership

Sec. 4. (a) The following members shall be appointed to the commission:

- (1) A member of the county executive of each county described in section 1 of this chapter, to be appointed by the county executive.
- (2) A member of the county fiscal body of each county described in section 1 of this chapter, to be appointed by the county fiscal body.
- (3) The county surveyor of each county described in section 1 of this chapter.
- (4) For a county having a population of not more than four hundred thousand (400,000), one (1) person appointed by the executive of each of the eleven (11) largest municipalities.
- (5) For a county having a population of more than four hundred thousand (400,000) but less than seven hundred thousand (700,000), one (1) person appointed by the executive of each of the nineteen (19) largest municipalities.
- (6) Beginning July 1, 2007, one (1) person appointed by the trustee of each township that:
 - (A) Is located in a county described in section 1 of this chapter;
 - (B) Has a population of at least eight thousand (8,000); and
 - (C) Does not contain a municipality.
- (b) One (1) voting member of the commission shall be appointed by the governor. The member appointed under this subsection may not vote in a weighted vote under section 9 of this chapter.
- (c) A member of the commission who is a county surveyor may not vote in a weighted vote under section 9 of this chapter.

As added by P.L.165-2003, SEC.6. Amended by P.L.169-2006, SEC.57.

IC 36-7-7.6-5

Sec. 5. (a) All commission members must be elected officials.

NIRPC’s Board of Commissioners established a new Committee structure of NIRPC to ensure diverse and equal representation and function of all the agency’s Committees. Membership includes representation from minority agencies and organizations, transportation, environmental, environmental justice, economic development, universities and representatives from the Urban Core Communities, including Gary, Hammond, East Chicago and Michigan City.

According to the Federal Register 23 CFR 450, NIRPC MPO policy committees, such as the Technical Planning Committee, shall consist of the following, “each MPO that serves a TMA shall consist of local elected officials, public transportation agencies or appropriate State officials on their policy boards”. NIRPC’s Board of Commissioners selects the representation on the Technical Planning Committee.

The following survey data represents a good faith effort in demonstrating NIRPC leadership’s racial and ethnic make-up. The data is limited based on entirely on voluntary participation and is listed by year giving the percent of received responses by committee.

Table 1: 2020 NIRPC Committee Membership Broken Down by Race Based on 2010 Census for the NIRPC Region of Lake, Porter and LaPorte Counties

Body	White alone	Black or African American alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some Other Race alone	Two or More Races	Hispanic or Latino
2010 Population	65.60%	18.40%	0.20%	1.10%	0.00%	0.10%	1.30%	13.30%
NIRPC Commission	75.00%	25.00%	-	-	-	-	-	-
NIRPC Executive Board	100%	-	-	-	-	-	-	-
Finance and Personal Committee	75.00%	25.00%	-	-	-	-	-	-
Legislative Committee	No Responses	-	-	-	-	-	-	-
Local Government Assistance Committee	100.00%	-	-	-	-	-	-	-
Outreach Committee	100%	-	-	-	-	-	-	-
Transportation Resources and Oversight Committee	50.00%	50.00%	-	-	-	-	-	-
Technical Planning Committee	75.00%	25.00%	-	-	-	-	-	-
Environmental Management Policy Committee	100.00%	-	-	-	-	-	-	-
Ped, Pedal, and Paddle Committee	100%	-	-	-	-	-	-	-
Land Use Committee	-	100.00%	-	-	-	-	-	-
Transit Operators Round Table	-	100.00%	-	-	-	-	-	-
Surface Transportation Committee	50.00%	50.00%	-	-	-	-	-	-



2020

NIRPC Commission – 51 received survey, 4 responded (7.84% response)

NIRPC Executive Board – 11 received survey, 2 responded (18.18% response)

Environmental Management Policy Committee (EMPC) – 41 received survey, 4 responded (9.75% response)

Surface Transportation Committee (STC) – 29 received survey, 2 responded (6.90% response)

Transit Operators Roundtable (TOR) – 12 received survey, 1 responded (8.33% response)

Land Use Committee – 39 received survey, 1 responded (2.56% response)

Transportation Resource Oversight Committee (TROC) - 41 received survey, 2 responded (4.88% response)

Finance and Personnel Committee - received survey 9, 5 responded (55.55% response)

Technical Planning Committee (TPC) - 23 received survey, 4 responded (17.39%)

Ped, Pedal, & Paddle Committee (3PC) – 23 received survey, 2 responded (8.70% response)

Local Government Assistance Committee – 37 received survey, 1 responded (2.70% response)

Table 2: 2021 NIRPC Committee Membership Broken Down by Race Based on 2010 Census for the NIRPC Region of Lake, Porter and LaPorte Counties

Body	White alone	Black or African American alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some Other Race alone	Two or More Races	Hispanic or Latino
2010 Population	65.60%	18.40%	0.20%	1.10%	0.00%	0.10%	1.30%	13.30%
NIRPC Commission	100.00	-	-	-	-	-	-	-
NIRPC Executive Board	66.67%	33.33%	-	-	-	-	-	-
Finance and Personal Committee	100.00%	-	-	-	-	-	-	-
Legislative Committee	No Responses	-	-	-	-	-	-	-
Local Government Assistance Committee	100.00%	-	-	-	-	-	-	-
Outreach Committee	100.00	-	-	-	-	-	-	-
Transportation Resources and Oversight Committee	50.00%	50.00%	-	-	-	-	-	-
Technical Planning Committee	80.00%	20.00%	-	-	-	-	-	-
Environmental Management Policy Committee	100.00%	-	-	-	-	-	-	-
Ped, Pedal, and Paddle Committee	100.00%	-	-	-	-	-	-	-
Land Use Committee	-	100.00%	-	-	-	-	-	-
Transit Operators Round Table	100.00%	-	-	-	-	-	-	-
Surface Transportation Committee	50.00%	50.00%	-	-	-	-	-	-



2021

NIRPC Commission – 50 received survey, 4 responded (8.00% response)

NIRPC Executive Board – 11 received survey, 3 responded (27.27% response)

Environmental Management Policy Committee (EMPC) – 41 received survey, 4 responded (9.75% response)

Surface Transportation Committee (STC) – 29 received survey, 2 responded (6.90%)

Transit Operators Roundtable (TOR) – 12 received survey, 1 responded (8.33% response)

Land Use Committee – 39 received survey, 1 responded (2.56% response)

Transportation Resource Oversight Committee (TROC) - 41 received survey, 2 responded (4.88% response)

Finance and Personnel Committee – received survey 9, 4 responded (44.44% response)

Technical Planning Committee (TPC) – 23 received survey, 5 responded (21.74% response)

Ped, Pedal, & Paddle Committee (3PC) – 23 received survey, 2 responded (8.70% response)

Local Government Assistance Committee – 37 received survey, 1 responded (2.70 % response)

Table 3: 2022 NIRPC Committee Membership Broken Down by Race Based on 2010 Census for the NIRPC Region of Lake, Porter and LaPorte Counties

Body	White alone	Black or African American alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some Other Race alone	Two or More Races	Hispanic or Latino
2010 Population	65.60%	18.40%	0.20%	1.10%	0.00%	0.10%	1.30%	13.30%
NIRPC Commission	100.00%	-	-	-	-	-	-	-
NIRPC Executive Board	66.67%	33.33%	-	-	-	-	-	-
Finance and Personal Committee	100.00%	-	-	-	-	-	-	-
Legislative Committee	100.00%	-	-	-	-	-	-	-
Local Government Assistance Committee	100.00%	-	-	-	-	-	-	-
Outreach Committee	100.00%	-	-	-	-	-	-	-
Transportation Research and Oversight Committee	50.00%	50.00%	-	-	-	-	-	-
Technical Planning Committee	80.00%	20.00%	-	-	-	-	-	-

Environmental Management Policy Committee	100.00%	-	-	-	-	-	-	-
Ped, Pedal, and Paddle Committee	100.00%	-	-	-	-	-	-	-
Land Use Committee	-	100.00%	-	-	-	-	-	-
Transit Operators Round Table	100.00%	-	-	-	-	-	-	-
Surface Transportation Committee	50.00%	50.00%	-	-	-	-	-	-

2022

NIRPC Commission – 51 received survey, 4 responded (8.00% response)

NIRPC Executive Board – 11 received survey, 3 responded (27.27% response)

Environmental Management Policy Committee (EMPC) – 41 received survey, 4 responded (9.76% response)

Surface Transportation Committee (STC) – 29 received survey, 2 responded (6.90% response)

Transit Operators Roundtable (TOR) – 12 received survey, 1 responded (8.33% response)

Land Use Committee – 39 received survey, 1 responded (2.56% response)

Transportation Resource Oversight Committee (TROC) - 41 received survey, 2 responded (4.88% response)

Finance and Personnel Committee – received survey 9, 4 responded (44.44% response)

Technical Planning Committee (TPC) – 23 received survey, 5 responded (21.74% response)

Ped, Pedal, & Paddle Committee (3PC) – 23 received survey, 2 responded (8.70% response)

Local Government Assistance Committee – 37 received survey, 1 responded (2.70 % response)

Outreach Committee – 37 received survey, 1 responded (2.70% response)

Table 4: 2023 NIRPC Committee Membership Broken Down by Race Based on 2010 Census for the NIRPC Region of Lake, Porter and LaPorte Counties

Body	White alone	Black or African American alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some Other Race alone	Two or More Races	Hispanic or Latino
2010 Population	65.60%	18.40%	0.20%	1.10%	0.00%	0.10%	1.30%	13.30%
NIRPC Commission	100.00%	-	-	-	-	-	-	-



NIRPC Executive Board	75.00%	25.00%	-	-	-	-	-	-
Finance and Personal Committee	100.00%	-	-	-	-	-	-	-
Legislative Committee	100.00%	-	-	-	-	-	-	-
Local Government Assistance Committee	100.00%	-	-	-	-	-	-	-
Outreach Committee	100.00%	-	-	-	-	-	-	-
Transportation Research and Oversight Committee	66.67%	33.33%	-	-	-	-	-	-
Technical Planning Committee	80.00%	20.00%	-	-	-	-	-	-



Environmental Management Policy Committee	100.00%	-	-	-	-	-	-	-
Ped, Pedal, and Paddle Committee	100.00%	-	-	-	-	-	-	-
Land Use Committee	-	100.00%	-	-	-	-	-	-
Transit Operators Round Table	100.00%	-	-	-	-	-	-	-
Surface Transportation Committee	50.00%	50.00%	-	-	-	-	-	-

2023

- NIRPC Commission – 51 received survey, 6 responded (11.76% response)
- NIRPC Executive Board – 11 received survey, 4 responded (36.36% response)
- Environmental Management Policy Committee (EMPC) – 41 received survey, 4 responded (9.76% response)
- Surface Transportation Committee (STC) – 29 received survey, 2 responded (6.90% response)
- Transit Operators Roundtable (TOR) – 12 received survey, 1 responded (8.33% response)
- Land Use Committee – 39 received survey, 1 responded (2.56% response)
- Transportation Resource Oversight Committee (TROC) - 41 received survey, 2 responded (4.88% response)
- Finance and Personnel Committee – received survey 9, 4 responded (44.44% response)
- Technical Planning Committee (TPC) – 23 received survey, 4 responded (17.39% response)
- Ped, Pedal, & Paddle Committee (3PC) – 23 received survey, 2 responded (8.70% response)
- Local Government Assistance Committee – 37 received survey, 1 responded (2.70 % response)
- Outreach Committee – 37 received survey, 1 responded (2.70% response)

Monitoring Subrecipients

NIRPC conducts Biennial Reviews of all Subrecipients, which includes addressing Title VI Federal Requirements. The purpose of a Biennial Review is to assess the subrecipient’s management practices and program implementation to evaluate compliance with federal requirements. The Biennial Review consists of two stages. The first stage is a desk review conducted at NIRPC to review documentation pertaining to the subrecipient. The second stage is a site visit for NIRPC to discuss any outstanding items, examine FTA-funded facilities and equipment, and review any additional documents.

The review package details the information needed for the Biennial Review Site Visit, most of which is provided in advance. This information request is organized into three parts: Subrecipient Profile, Requested Documents and Questions for the Review. The Biennial Reviewers may request additional information during the site visit. A draft report is issued at the end of the process, describing any deficiencies in the subrecipient’s program that have been identified and the necessary corrective actions. In order to enable NIRPC to make these determinations during the



site visit, the subrecipient must submit the information requested, and written responses to the questions.

Requirement to Conduct Equity Analysis to Determine Site or Location of Facilities

No such projects requiring land acquisition or the displacement of persons from their residences and businesses was conducted during this reporting period.

Part II. MPO Requirements

As a recipient of Federal Transit Administration (FTA) funds, NIRPC submits the following information under the Metropolitan Transportation Planning Organizations Reporting Requirements of Chapter VI of the Circular.

Demographic Profile

Population and Job Density

The population density levels in the region were mapped. The highest population density in the study area can be found in the south side neighborhood of East Chicago. This neighborhood features two-flat housing that promotes greater population density than standalone, single-family, homes. While this type of housing is also present in other parts of the study area, this area has fewer vacant lots and buildings than comparative neighborhoods. East Chicago also has the other five densest neighborhoods in the study area. Other pockets of high-density areas in the region are in Hammond, Gary, Michigan City, Whiting, and Griffith.

Job density is highest near Franciscan Hospital and along Hohman Avenue south of the hospital in Downtown Hammond; two other areas near hospitals are among the top five densest areas: Gary (Methodist Hospital) and Munster (Community Hospital). The downtown areas of LaPorte, Valparaiso, and Michigan City also have relatively high job density. The highest number of jobs regardless of density is in the retail corridor near the Southlake Mall in Merrillville.

Transit Dependent Populations

Certain populations tend to be more transit dependent¹; these populations are typically:

- Low Income (below \$15,000 annual income) - Low-income residents are about 1.5 times more likely to use transit
- Minority Population - Minority populations are more than twice as likely to use transit
- Persons Over 65 - People over 65 years old are 1.5 times more likely to use transit
- Persons without a car - Those without access to a car are almost eight times more likely to use transit
- Individuals with a Disability (18-64) - Persons with disabilities are over 5 times more likely more likely to use transit

Low-Income

The west side of Hammond and east-central Gary have the highest concentration of low-income households in the study area. There are also high concentrations of low-income populations in areas of East Chicago, in and around the Lakeside Gardens low-income apartment complex. Of the areas with the greater density of low-income populations, three are in East Chicago (Southside and just north of the Sunnyside neighborhoods) and two are in Gary.

Minority Population

The highest concentrations of minority residents are in East Chicago, Hammond, Gary, and Michigan City. While minority populations are located throughout the region, rural areas in Northwest Indiana have significantly fewer minority residents than urban areas, and some block groups registered no minority residents.

People with Disabilities

¹ TCRP Report 28: Transit Markets of the Future: The Challenge of Change” Table 4 (Work trip data).

Unlike the previous demographic groups, there are relatively high percentages of people with disabilities in rural parts of the study area. High concentrations of people with disabilities are present in both urban and rural areas in the region. Areas with greater numbers of people with disabilities include the municipalities of Hammond, East Chicago, New Chicago, Lake Station, LaPorte, and rural LaPorte County. There also is a large percentage of persons with disabilities living just south of the Hammond South Shore Line station.

Senior Population

Concentrations of seniors (65 and over) are present throughout Northwest Indiana. The highest percentage of those 65 and over live in Merrillville, in the neighborhood where the Golden Living Center, Belvedere Senior Center, and the Spring Mill Health Campus are located.

No Vehicle Access

People with no access to a vehicle are concentrated in Gary and East Chicago. The highest percentage of people without access to a vehicle corresponds to the block group with the highest percentage living in poverty (Lakeside Gardens in East Chicago).

Environmental Justice Benefits and Burdens Analysis

According to Executive Order #12898 and FTA Circular 4702.1B, NIRPC as a Metropolitan Planning Organization helping to administer federal transportation funding must demonstrate that it has an analytical framework in place to ensure that minority and low-income populations (defined as the Environmental Justice population) are not disproportionately burdened by the transportation projects that the federal transportation funds benefit. In adopting *NWI 2050+* for the Northwestern Indiana Region, NIRPC expands the definition of the Environmental Justice population to include those Census Block Groups in the region that have a lower level of English proficiency, have more persons with disabilities, have more senior citizens aged 65 or older, have more households without access to a vehicle, and have more veterans in addition to having more minorities and low-income households compared with the region average.

The analytical framework that NIRPC uses in order to track if the transportation projects benefiting from federal funding are disproportionately burdening the Environmental Justice population hinges on 6 performance measures:

1. Population within Environmental Justice Census Block Groups that are in fixed route transit service areas in 2019 baseline year of *NWI 2050+*
2. Population within Environmental Justice Census Block Groups within fixed route transit service areas as a percentage of total Environmental Justice population compared with total regional population within fixed route transit service areas as a percentage of total regional population in 2019 baseline year of *NWI 2050+*
3. Annual weekday person hours of delay per capita in Environmental Justice Census Block Groups compared with annual weekday person hours of delay per capita in the entire region in the 2019 baseline year of *NWI 2050+*
4. Forecasted annual weekday person hours of delay per capita in Environmental Justice Census Block Groups compared with forecasted annual weekday person hours of delay per capita in the entire region in the 2050 horizon year of *NWI 2050+* assuming a complete buildout of all fiscally constrained planned transportation projects in *NWI 2050+*
5. Percent change in annual weekday person hours of delay per capita in Environmental Justice Census Block Groups from 2019 to 2050 compared with percent change in annual weekday person hours of delay per capita for the entire region assuming a complete buildout of all fiscally constrained planned transportation projects in *NWI 2050+*
6. Percent change in annual weekday person hours of delay per capita in Environmental Justice Census Block Groups in 2050 from assuming no federal projects are built from 2019 to 2050 to assuming a complete buildout of all fiscally constrained planned transportation projects in *NWI 2050+* compared with percent change in annual weekday person hours of delay per capita for the entire region in 2050 from assuming no federal projects are built from 2019 to 2050 to assuming a complete buildout of all fiscally constrained planned transportation projects in *NWI 2050+*

Performance Measure Results

Table 5: Performance Measures Used for Analyzing Benefits and Burdens of Federally Funded Transportation Projects on Environmental Justice Population

Performance Measure (See previous for the numbers the Performance Measures Correspond to)	Number	Sources
1.	182,176	OnTheMap, U.S. Census Bureau, Center for Economic Studies, 2019 American Community Survey 5- Year Estimates Tables B01003, B08141
2.	41.8% vs. 23.3%	OnTheMap, U.S. Census Bureau, Center for Economic Studies, 2019 American Community Survey 5- Year Estimates Tables B01003, B081417
3.	55.9 hours vs. 26.9 hours	NIRPC Travel Demand Model
4.	98.0 hours vs. 48.6 hours	NIRPC Travel Demand Model
5.	75.5% increase in delay vs. 80.9% increase in delay	NIRPC Travel Demand Model
6.	80.9% increase in delay vs. 186.8% increase in delay	NIRPC Travel Demand Model

Table 5 shows that nearly half of the Environmental Justice population in the Northwestern Indiana Region lives within fixed route transit service areas (performance measure #2). This is significantly higher than the just over one quarter of the regional population in general that lives within fixed route transit service areas, indicating that NIRPC is helping to administer federal transportation funding for fixed route transit in such a way that disproportionately *benefits* the Environmental Justice population. On the other hand, Table 1 shows that the average person traveling on the transportation network within an Environmental Justice Census Block Group experiences significantly more delay on weekdays over the course of the year than the average person traveling on the transportation network anywhere in the region (performance measures #3 and #4). At first glance, this would indicate that NIRPC administers federal transportation funding in such a way that burdens the Environmental Justice population. However, this is not a reasonable conclusion for a couple key reasons. First, as performance measure #6 shows, implementing the federally funded transportation projects in the year 2050 results in a lesser increase in delay for the transportation network within Environmental Justice Census Block Groups than the increase in delay forecasted on the transportation network in general across the region versus a hypothetical year 2050 where no additional federally funded transportation projects are implemented. This means that NIRPC is in fact planning, programming,



and implementing federally funded transportation projects in such a way that will benefit the Environmental Justice Census Block Groups more than will benefit the regional population in general. Second, the Environmental Justice Census Block Groups tend to be clustered closer to the Chicago Central Business District than the Northwestern Indiana Region in general, so a significant portion of the travelers on the transportation network within Environmental Justice Census Block Groups are likely travelers originating from non-Environmental Justice Census Block Groups commuting to and from Chicago. This means that it is primarily the geographic location of the Environmental Justice Census Block Groups that is causing more delay rather than the result of planning, programming, or implementing federally funded transportation projects.

NIRPC is committed to continuously monitoring the performance measures in Table 1 in addition to the performance measures found in *NWI 2050+* in order to ensure that the Environmental Justice population is not unduly burdened by decisions related to federal transportation funding. Based on the most current analysis of the performance measures, NIRPC finds no evidence that planning, programming, or implementing federally funded transportation projects in the Northwestern Indiana Region is disproportionately burdening the Environmental Justice population.

Description of Procedures Within Planning Process

A five-year Transportation Improvement Program (TIP) is developed in tandem with NIRPC's Metropolitan Transportation Plan. The TIP is updated every two years. NIRPC's current TIP as approved by USDOT (FHWA & FTA, jointly) and INDOT is the 2022-2026 TIP, which was completed in accordance with *NWI 2050*. NIRPC has adopted the 2024-2028 TIP, which was completed alongside an updated MTP *NWI 2050+*, and it is awaiting approval from our federal and state partners. The TIP represents the fiscally constrained list of federal-aid transportation infrastructure projects as well as operating assistance and other assistance for transit operators in Lake, Porter and La Porte Counties and represents the short-range investment portfolio for this plan.

Projects are solicited for the TIP by NIRPC every two years through a Notice of Funding Availability (NOFA). Based on the type of federally eligible projects and NIRPC goals as stated in the MTP, thirteen investment programs were identified, and applications for funding were developed accordingly. Applications submitted must choose from one of the seventy-seven (77) project types that are provided. Through a rigorous exercise, projects are sent to one of the five topical committees according to the project type that aligns with that committee. The committees and the applications that they review are:

- Environmental Management & Policy Committee (EMPC)
 - Air Quality applications
 - Environmental applications
- Ped, Pedal, & Paddle Committee (3PC)
 - Multi-Use Trails applications
 - Complete Streets applications
- Land Use Committee (LUC)
 - New Roadways applications (jointly with STC)
 - Planning applications
 - Quality of Place applications
- Surface Transportation Committee (STC)
 - New Roadways applications (jointly with LUC)
 - Roadway Modification applications
- Transit Operators Roundtable (TOR)
 - Vehicle Replacement applications
 - Other funding requests outside of Operating Assistance and Preventative Maintenance

Demographic Maps Showing Impacts of State and Federal Funds

Transit Operator Service Areas (NIRPC Subrecipients)

Figure 4: Travel Demand Index with Fixed Route, Deviated Fixed Route, and Demand Response transit in Northwest Indiana

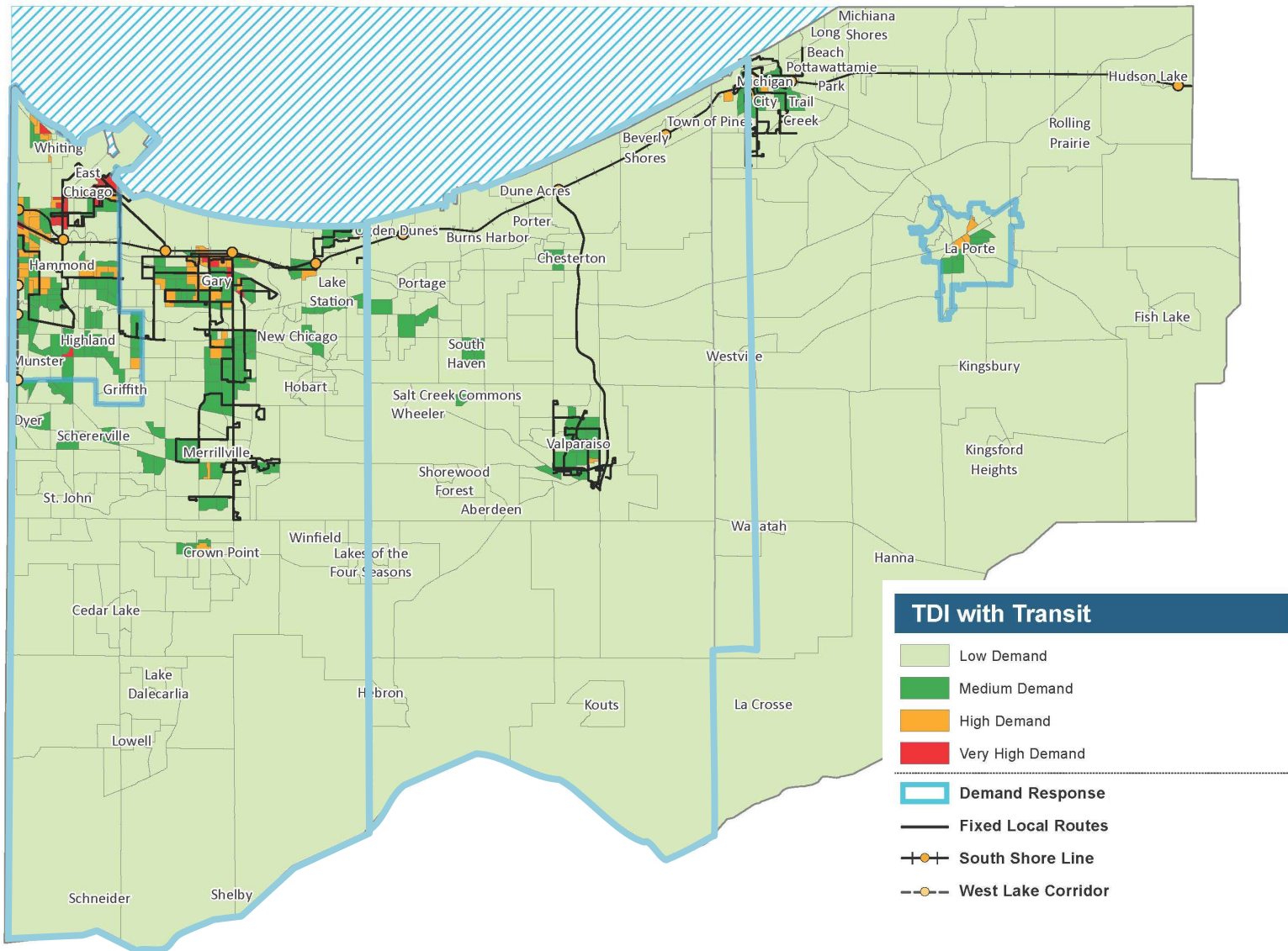


Figure 5: Demand Response Transit Operators in Northwest Indiana

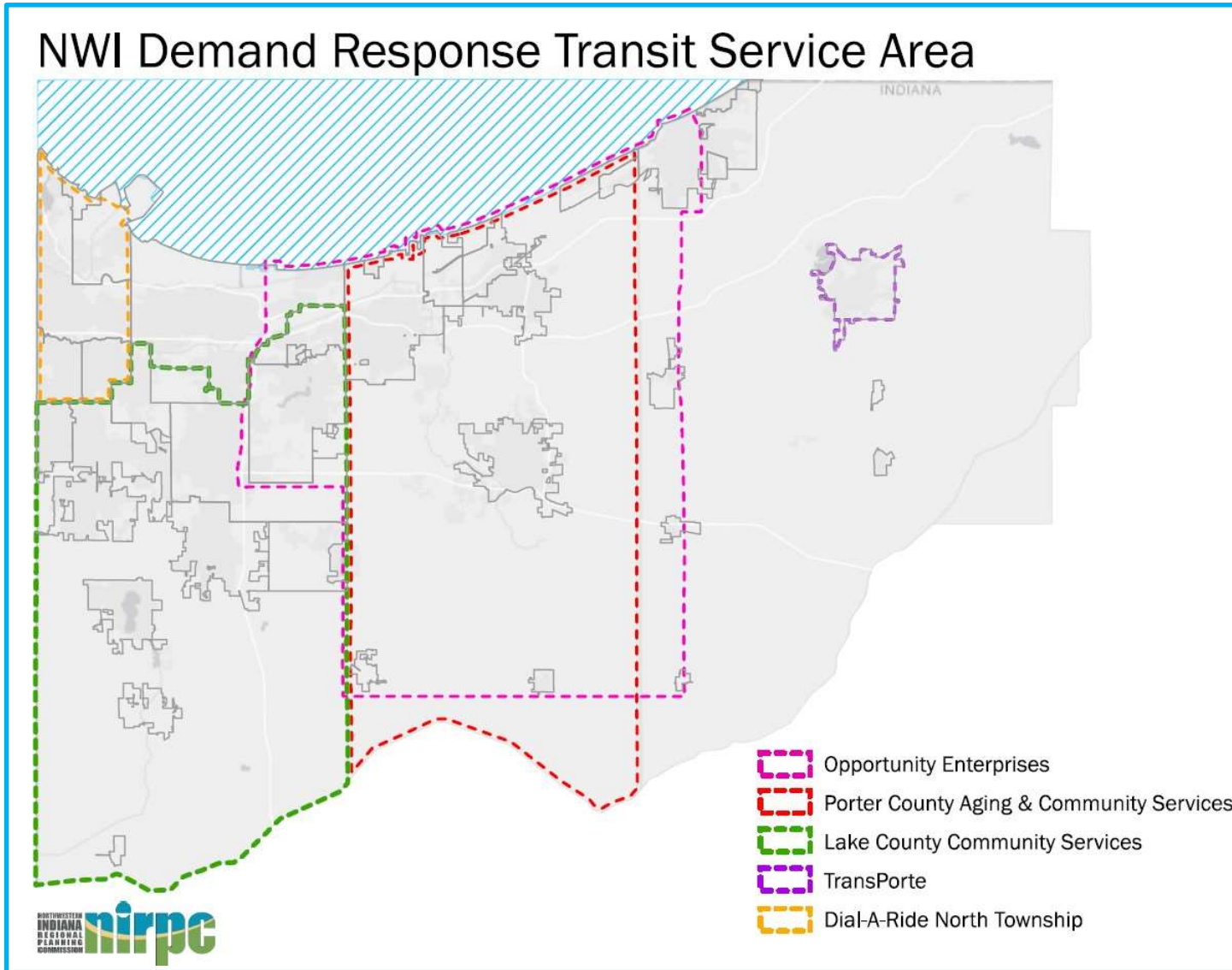


Table 5: Transit Operator Funding and Estimated Expenditures by Minority/Non-Minority Population

Transit Operator	Population Within Service Area				Federal Funds Allocated (Dollars)			Funding by Minority Status within Service Area			
	Total Population	Non-Minority	Minority	% Minority	2020	2021	2022	Total	Total Funding Dollars Per Capita	Non-Minority Funding Totals	Minority Funding Totals
East Chicago Transit	62,784	23,388	39,396	62.75%	760,824	1,038,604	677,194	2,476,622	39.47	920,607.20	1,554,042.40
North Township DAR	167,556	93,526	74,030	44.18%	423,415	366,447	363,495	1,153,357	6.78	643,778.00	509,578.99
LCCS	304,587	231,748	72,839	23.91%	657,602	615,002	685,562	1,958,166	6.43	1,489,889.77	468,276.23
OE	286,667	231,716	54,951	19.17%	257,200	254,960	258,000	770,160	2.69	622,528.56	147,631.44
PCACS	169,482	151,820	17,662	10.42%	366,400	252,000	252,000	870,400	5.14	779,694.17	90,705.83
Valparaiso Transit	48,193	43,327	4,866	10.10%	475,834	675,834	475,834	1,627,502	33.77	1,463,174.70	164,327.28
LaPorte TransPorte	29,467	25,627	3,840	13.03%	266,600	414,106	508,638	1,189,344	40.36	1,034,354.30	154,988.38
All NIRPC Subs:	1,068,736	801,152	267,584	25.04%	3,207,875	3,616,953	3,220,723	10,045,551	9.24	7,530,403.50	2,515,147.50
NICTD	141,721	62,918	78,803	55.60%	27,820,911	26,135,252	26,229,252	80,185,415	565.80	35,598,859.30	44,586,555.70
GPTC	216,902	80,606	136,296	62.84	6,111,018	6,413,068	5,754,920	18,279,006	84.27	6,792,918.27	11,486,087.70
Michigan City Transit	35,856	23,524	12,332	34.40%	750,000	939,500	1,197,500	2,887,000	80.24	1,894,070.39	992,929.61
Non-NIRPC Direct Recipient:	394,479	167,048	227,431	57.70%	34,681,929	33,487,820	33,181,672	101,351,421	256.92	42,918,766.70	58,432,654.30
All Transit Operators:	1,463,215	968,200	495,015	33.80%	37,889,804	37,104,773	36,402,395	111,396,972	76.13	73,710,663.40	27,686,308.60



	Non-Minority	Minority
Subrecipient Ratio of Non-Minority / Minority Funding:	\$7	\$9
Direct Recipient Ratio of Non-Minority / Minority Funding:	\$108	\$147
Regional Ratio of Non-Minority / Minority Funding:	\$50	\$55

The above transit service area maps demonstrate a clear commitment to providing transit to populations considered to be a minority, low-income, or limited-English proficiency.

As illustrated in the corresponding transit service area maps, the concentrations of people who are considered to be a minority, low income, or limited-English proficiency are a priority for regional transit service. Most of these communities, with some exceptions, are serviced by fixed-route transit: either as an inter-city commuter service with connections to Chicago, or as typical fixed-route with complementary paratransit as seen in East Chicago, Gary, Hammond, Merrillville, and Michigan City. Broader swaths of the Region are covered and connected by demand-response transit operators. With some exceptions, demand-response operators in Northwestern Indiana primarily serve to connect rural communities with each other and with the urban communities as well. Additionally, when the maps and service areas are paired with demographic data it's clear that NIRPC's distribution of transit funds (to service areas that directly serve the highest concentrations of people who are minorities or low-income), that even within those service areas transit funding for people who are minorities or low income is out-pacing funding for those who are not. This shows there is more transit funding going to areas of the region that have a higher percentage of minority, low-income and limited English populations.

Analysis of Transportation System Investments

From the previously demonstrated mapping and funding analyses, there are no disparate impacts based on race, color, or national origin.

The attached maps indicate a clear concentration of service in the urban core areas where most of the people considered to be minorities, people who are low income, and people with limited-English proficiency live. Additionally, when those service areas are matched with an analysis of how federal funds were spent between 2020 - 2022, NIRPC and its subrecipients put an emphasis on having transit available and funding transit in areas with a higher transit index. This emphasizes areas with higher percentages of populations that are minorities, low-income, and with limited English proficiency. The tables above show population, funding, and minority data for transit in Northwest Indiana.

A description of the procedures the MPO uses to pass through FTA financial assistance to subrecipients in a non-discriminatory manner.

NIRPC serves as both the MPO and the direct recipient for seven transit subrecipients of federal transit funding. While NIRPC has some oversight in how projects are selected, and how the service is administered, NIRPC does and does not operate public transit nor make requirements of subrecipients day-to-day operations outside of what is specifically-required by FTA.

All transit operators (the seven NIRPC subrecipients and three direct recipients), participate in the development of NIRPC plans, policies and procedures. First and foremost, all transit operators have a technical working group that reports to the Technical Planning Committee: The Transit Operator's Roundtable. The Roundtable provides valuable insight on transit issues related to funding, coordination, technical capacity, public outreach, and other topics to members of the committee and to the Technical Planning Committee directly. During the development of planning documents required by the MPO, such as the long-range plan, TIP, or public participation plan, input is sought directly from the transit operators. Furthermore, transit operators are required to be six of the 20 voting-members of the Technical Planning Committee. This way transit operators have direct input into nearly any planning work related to NIRPC, but specifically related to funding from FTA.

Even after providing input into the planning process of the long-range plan and the TIP, subrecipients are still required to submit projects into the NOFA. This helps maintain an objective set of transit programming by ranking projects of similar types against each other with criteria like how the service connects individuals to jobs, important destinations, but most importantly how it connects to communities of people considered to be minorities, low income, and with limited-English proficiency. The details of how projects are scored and how the public is involved throughout the process is detailed earlier, in the "Description of Procedures Within Planning Process." All new projects and project-changes of \$100,000 or greater function as a TIP amendment and are subject to a 21-day public comment period where the public or other transit operators can comment on the nature of the project and flag it if it is perceived to be discriminatory. These comments are packaged and prepared ahead of any TIP amendment before Commission approval finalizes the changes.

A description of the procedures the MPO uses to provide assistance to potential subrecipients applying for funding, including its efforts to assist applicants that would serve predominantly minority populations.

NIRPC is both the MPO and the direct recipient and does not operate public transit. Procedurally, NIRPC includes all known private providers of transit in the distribution of the TIP call for projects. The solicitation notes the need to establish eligibility for non-public operators as a condition of participation in the grant process. The solicitation is distributed to the four major daily papers, multiple radio stations, and posted on NIRPC's website and Facebook page. Three of the major daily papers serve areas with concentrations of minority and low-income persons.

When an inquiry is received about accessing federal transit funds, an opportunity to meet with staff is always offered, regardless of where the service may be provided. Staff reviews the proposed services based on project eligibility, financial capacity of operator, and long-term sustainability of the service.

The first meeting is to exchange information about the proposed service, and about the federal funding programs. If a potential provider has prepared documents (usually a business plan) the staff will review them with the provider. Staff provides information on FTA, its funding opportunities, and oversight requirements. If appropriate, staff will recommend contacting a specific public operator to determine

partnership opportunities, particularly in areas underserved by existing transit. Staff will help identify project weaknesses and recommend solutions, if possible.

Follow-up meetings and inspection of facilities are scheduled if the proposed service is found eligible and the operator is interested in proceeding. More detailed information on the operator's past experience and financial capacity to manage federal funds is generally the subject of the first follow-up meeting. Staff will maintain close contact with the operator for as long as the operator wishes to pursue a grant. Staff will continue to provide technical assistance as needed as is done for all of the transit operators in the MPO planning area.

Part III. NIRPC Recertification Attachments

Attachment #1: NIRPC's Title VI Complaint Procedures

Attachment #2: Limited English Proficiency Strategy

Attachment #3: 2010 Limited English Proficiency Demographic Profile

Attachment #4: Minority & Low-Income Population Distribution Maps

Attachment #5: Minority & Low-Income Population Distribution Chart

Attachment #1: NIRPC's Title VI Complaint Procedures

NIRPC Procedures for Tracking and Investigating Civil Rights Complaints

Title VI of the Civil Rights Act of 1964, as amended, prohibits discrimination on the basis of race, color, or national origin in programs and services funded, in whole or part, by financial assistance from the United States Government. NIRPC extends this prohibition to individuals on the basis of disability, religion and gender. Section 504 of the Rehabilitation Act of 1973 (Section 504) and the Americans with Disabilities Act (ADA) prohibit discrimination on the basis of disability.

All services and programs operated or sponsored by the Northwestern Indiana Regional Planning Commission, 6100 Southport Road, Portage, Indiana, 46368 are subject to the requirements and obligations of Title VI, Section 504 and the ADA. It is the intention of the Northwestern Indiana Regional Planning Commission (NIRPC) to comply fully with Title VI, Section 504 and the ADA.

Under the provisions of Title VI, Section 504 and the ADA, persons who believe that they have experienced or witnessed any act or inaction, intentional or otherwise, in any program, service, or activity operated by or sponsored by the NIRPC that results in or may result in disparate treatment or impact, or perpetuates the effects of prior discrimination on the basis of race, color, national origin, gender, religion, or disability may file a written complaint with the NIRPC or directly with the U.S. Federal Transit Administration (FTA), the Federal Highway Administration (FHWA), or the Indiana Department of Transportation (INDOT).

Complaints filed directly with FTA must be mailed within 180 days of any alleged discrimination. Complaints should be mailed to:

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

Complaints filed directly with FHWA must be mailed within 180 days of any alleged discrimination. Complaints should be mailed to:

Federal Highway Administration Office of Civil Rights
Attention: Title VI Program Coordinator
1200 New Jersey Ave. SE
Washington, D.C. 20590

Complaints filed directly with INDOT must be mailed within 180 days of any alleged discrimination. Complaints should be mailed to:

Indiana Department of Transportation
Attention Title VI Program Coordinator
100 N. Senate Ave. Room 750
Indianapolis, Indiana 46204

Or via the INDOT website at: <https://www.in.gov/indot/contact-indot/report-a-concern2/>

How to File a Complaint to NIRPC

A person with a Title VI or ADA complaint may also submit the complaint to NIRPC using the following procedures:

1. A complaint may be submitted in writing and must include the person's name and contact information, the date of the incident, and the identity of the person or department or service that caused the complaint. Complaints may be sent via mail, email, fax, or hand delivered and shall be addressed to the NIRPC Compliance Specialist 6100 Southport Road, Portage, IN 46368. aweitgenant@nirpc.org
2. A complaint may be taken verbally and must include the person's name and contact information, the date of the incident, and the identity of the person, department or service that caused the complaint.
3. Persons with a complaint may request a neutral third party to hear a verbal complaint or assist with a written complaint. The selection of the neutral third party shall be made cooperatively between NIRPC and the person filing the complaint.
4. All complaints shall be addressed to the NIRPC Compliance Specialist.

NIRPC Complaint Procedure

1. The person filing a complaint on the basis of discrimination based on race, color, gender, religion, national origin or disability will be informed that the complaint may be either filed directly with the FTA, FHWA, INDOT or with NIRPC. It shall be the responsibility of the Compliance Manager of NIRPC, or her designee, to track, investigate and document Title VI, Section 504, and ADA complaints.
2. If the person opts to file the complaint with NIRPC, the complaint will be directed by the Compliance Specialist to the appropriate department manager for a fact-finding review. The manager will prepare a written response to the complaint and submit it to the NIRPC Compliance Specialist.
3. If the NIRPC Compliance Manager determines that the fact-finding review substantiated the complaint, he shall report the same to the NIRPC Executive Director, who will order, or authorize the Compliance Specialist to order, corrective action be taken as warranted.
4. The person who filed the complaint will be consulted as to the adequacy of the proposed remedy. If acceptable, the matter is concluded.
5. If the proposed remedy is not acceptable, the person who filed the complaint may appeal and request a hearing with the NIRPC Finance and Personnel Committee for purposes of stating their complaint and identifying an appropriate remedy.

6. The Finance and Personnel Committee will issue a response and recommend a remedy within ten days of the hearing.
7. If acceptable, the matter is concluded. If not, the person is again advised of the appropriate steps to appeal the complaint with the FTA, FHWA or INDOT.
8. The NIRPC Compliance Specialist shall maintain the files and records of the NIRPC relating to the complaints filed verbal and written for a period of three years.

Requests for this document in alternate format or assistance in preparing a complaint may be directed to NIRPC staff Ann Weitgenant at aweitgenant@nirpc.org, or by phone at 219-243-5945. TTY users may utilize the Relay Indiana Service by calling 711 or (800) 743-3333.

The Northwestern Indiana Regional Planning Commission
COMPLAINT FORM

All written complaints about any matter relating to civil rights, shall be submitted on this form. NIRPC will assist those who submit verbal complaints to transfer these complaints onto this written form. You are required to complete all sections. Before completing this form, please ensure that you have read NIRPC's Procedures for Tracking and Investigating Civil Rights Complaints. You should expect an acknowledgement within 10 working days and will be informed of the outcome of your complaint within 90 days, unless NIRPC notifies you that the investigation will need additional time.

This form should be sent to the Compliance Specialist of the Northwestern Indiana Regional Planning Commission

Please keep a copy of this form for your records, plus any material you submit.

SECTION A - YOUR DETAILS

Title Name(s).....

Address
.....

CityState..... Zip

Telephone Number

SECTION B - NATURE OF THE COMPLAINT

Please set out below the main points of your complaint.

Use additional sheets if necessary.



PLEASE LIST ANY DOCUMENTARY EVIDENCE ATTACHED AND MAKE SURE YOU KEEP A COPY.
(E.g., any correspondence, list of dates when events occurred, or other documentation related to your complaint)

SECTION C - AN OUTLINE OF THE ACTION YOU HAVE TAKEN SO FAR

Please outline the steps you have already taken to resolve your complaint informally:

With whom was it discussed?

Date

Position

Department(s)

Describe the outcome of any action taken so far and explain why you believe that the matter has not yet been resolved.

SECTION D - DESIRED OUTCOME

Please describe the action you would like to see taken in order to resolve the complaint to your satisfaction.

SECTION E - DECLARATION

I believe that the above information is accurate. I confirm that details of this complaint can be passed on to the NIRPC Finance and Personnel Committee for appeal (if applicable).

Signature:

Name

Contact Information

Date:



FOR OFFICE USE ONLY:

Acknowledgement sent

Reply sent

Complaint forwarded to department

Response received

What action (if any) is now needed?

.....
.....

Attachment #2: Limited English Proficiency Strategy

Northwestern Indiana Regional Planning Commission Lake, Porter, and LaPorte Counties, Indiana

Northwestern Indiana Regional Planning Commission (NIRPC) receives federal financial assistance from the US Department of Transportation (US DOT). For this reason, it is subject to the US DOT's Limited English Proficiency Guidance, issued on December 14, 2005. NIRPC has prepared a Limited English Proficiency (LEP) strategy, as well as completed the Four Factor Analysis suggested in the guidance.

NIRPC offers services to outside entities that include: 1) Transportation Planning & Technical Assistance; 2) Public Transit Grants Management, Oversight, Procurement, and Technical Assistance; and 3) Environmental Public Education. NIRPC also passes FTA public transit funds through to seven (7) public transit operators in Lake, Porter, and LaPorte Counties.

Pass-Through Public Transit Operators. The Public Transit Grants division, among other things, passes FTA funds through to seven (7) public transit operators in the three-county area. A separate LEP analysis was not prepared for these operators. The three operators serving identified LEP areas have long acknowledged the need for and developed second language schedules and rider guides, and other service information. These operators include East Chicago Transit, North Township Dial-a-Ride and City of La Porte Transporte.

Demographic Data. Demographic data for northwest Indiana shows a significant concentration of Limited English Proficiency (LEP) persons in ten census tracts in northern Lake County. One of these is in Gary (Indiana), which is outside of the area covered by NIRPC's transit subrecipients but within the area of our other services (Planning and Environmental Education).

The Four Factor Analysis.

Number or proportion of LEP persons eligible to be served or likely to be served or encountered by a program, activity, or service.

Transportation Planning & Technical Assistance: Fewer than 10 persons per year.

Persons served or encountered under these programs on a regular (ongoing) basis are those regular participants in the metropolitan transportation planning process, representatives of cities, towns, and counties, and technical personnel, including engineers and federal/state transportation officials.

Persons served or encountered on a sporadic basis are members of the general public who are asked to serve on planning focus groups to comment on transportation plans and projects. These are usually one-time only encounters.

Public Transit Grants Management, Oversight, Procurement, and Technical Assistance: Fewer than 10 persons per year.

Most encounters are the representatives of local transit operators, chief elected officials, and State/FTA officials.

Environmental Services: Over 500 persons per year (estimated)

Most encounters here are with the public at outreach events, which occur at public schools, county fairs, recycling events, and other sometimes unusual locations and venues.

Frequency with which LEP persons come in contact with the program.

Transportation Planning and Technical Assistance: Low Frequency

The public is involved in the transportation planning process through purposeful, intentional interactions (such as open houses, focus groups, and other venues established with the intent of obtaining thoughts, ideas, comments, and suggestions regarding a vision of the future. These events are usually held in conjunction with a long-range transportation plan development (every four years) and transportation improvement program development (every two years).

There is also a Technical Planning Committee (TPC) that meets monthly at which topics of interest, including policy recommendations are considered & recommended for approval by the NIRPC Board.

Public Transit Grants Management, Oversight, Procurement, and Technical Assistance: Low Frequency

This function within NIRPC is responsible for all post-grant activities associated with FTA grants.

Environmental Services: Moderate Frequency

This division of NIRPC previously operated an air quality public education program funded with FHWA Congestion Mitigation/Air Quality Program funds. There was significant interaction with school-age children, environmental organizations, public officials, and community groups on an ongoing basis.

The nature and importance of the program, activity, or service provided by the recipient to people's lives.

All Services: Very Low to Low

NIRPC's services to the public are neither life-sustaining nor critical to the daily needs of people. Transportation planning, transit grant administration, transit subrecipient oversight/procurement, and environmental education are not quite as significant in comparison to the need for food, human services, medical services, transportation, and other similar, life-sustaining services.

The resources available to the recipient and costs.

The cost of developing written materials in multiple languages has not been explored. However, given the low encounter rates discussed earlier, it is likely that a large-scale production of written documents, such as transportation plans, transportation improvement programs, and air quality conformity determinations within the metropolitan planning division would be expensive. In these instances, the cost of translating these documents would likely not be cost-effective.

The environmental education program does not generate any significant planning studies and related documents. It already produces some Spanish-language materials that are intended for direct distribution to the public in northern Lake County.

Planning funds are utilized for document translations.

Conclusion.

The low number of LEP persons accessing services in the past, the low frequency at which LEP persons encounter NIRPC's services, and the insignificant value of our services to the daily lives of people all seem to indicate that only very limited measures are needed to address needs of the LEP (primarily Spanish-speaking) population. Although the needs are limited based on the four-factor analysis, NIRPC accommodates LEP persons as a part of the planning process by translating documents, and hiring translators for outreach events.

The NIRPC website can be translated into Arabic, Chinese, French, German, Greek, Hindi, Italian, Korean, Macedonian, Polish, Portuguese, Russian, Serbian, Spanish and Thai using the "Translate This Page" option available on the NIRPC website.

Regarding metropolitan planning, when NIRPC communicates with the public regarding an opportunity for anyone to participate in, comment on, or provide input to, some effort is needed to communicate with LEP persons so that their thoughts, concerns, and suggestions may be heard and understood.

Upon-request, up to 72 hours before a transportation outreach event, per the requirements of Engage NWI, NIRPC's Public Participation Plan accommodations for LEP persons can be made. As a part of NIRPC's LEP strategy, prior to outreach events, NIRPC has documents translated into Spanish as well as a Spanish translator available to attend outreach events to translate comments.

There is no need for grant administration, oversight, and procurement program-related materials to be translated.

The number of encounters with LEP populations is higher in the environmental department than other NIRPC divisions. There is a need for bilingual environmental education materials in locations where there is a significant Spanish-speaking population. Due to this, the Environmental Division has and will continue to translate core educational materials into Spanish and distribute these materials in these areas. Materials include an asthma awareness guide, a watershed protection booklet, and a Citizens Guide to the MS4 Program.

- | | | |
|--------------------------|--|------------------------|
| <input type="checkbox"/> | ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية. | 1. Arabic |
| <input type="checkbox"/> | lu-i.'l{'nLd l,'L.,p,'Liinuf 1tw11wrli.p, WJU .p,wnwlt,nLunuf, l.pl. \ununLd lt....f lt.wrrp,uf, yuJl.rl.'Li: | 2. Armenian |
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| <input type="checkbox"/> | 如果你能读中文或讲中文，请选择此框。 | 6. Simplified Chinese |
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| <input type="checkbox"/> | Oznacite ovaj kvadratic ako citate iii govorite h.rvatski jezik. | 8. Croatian |
| <input type="checkbox"/> | Zaskrtnete tuto kolonku, pokud ctete a hovoríte cesky. | 9. Czech |
| <input type="checkbox"/> | Krnis dit vakje aan als u Nederlands kunt lezen of spreken. | 10. Dutch |
| <input type="checkbox"/> | Mark this box if you read or speak English. | 11. English |
| <input type="checkbox"/> | اگر خواندن و نوشتن فارسي بلد هستيد، اين مربع را علامت بنويد. | 12. Farsi |

- Cacher ici si vous lisez ou parlez le français. 13. French
- Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen. 14. German
- Σημειώστε αυτό το πλαίσιο αν διαβάζετε ή μιλάτε Ελληνικά. 15. Greek
- Make kazyé sa a si ou li oswa ou pale kreyol ayisyen. 16. Haitian Creole

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- Jelölje meg ezt a kockat, ha megerti vagy beszeli a magyar nyelvet. 19. Hungarian
- Markaam daytoy uga kahon no makabasa wenno roakasaoka iti Ilocano. 20. Ilocano
- Marchi questa casella se legge o parla italiano. 21. Italian
- 日本語を読んだり、話せる場合はここに印を付けてください。 22. Japanese
- 한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오. 23. Korean
- 0 24. Laotian
- Prosimy o zaznaczenie tego kwadratu, jeżeli po ługuje si Pan/Pani j zykiem polskim. 25. Polish

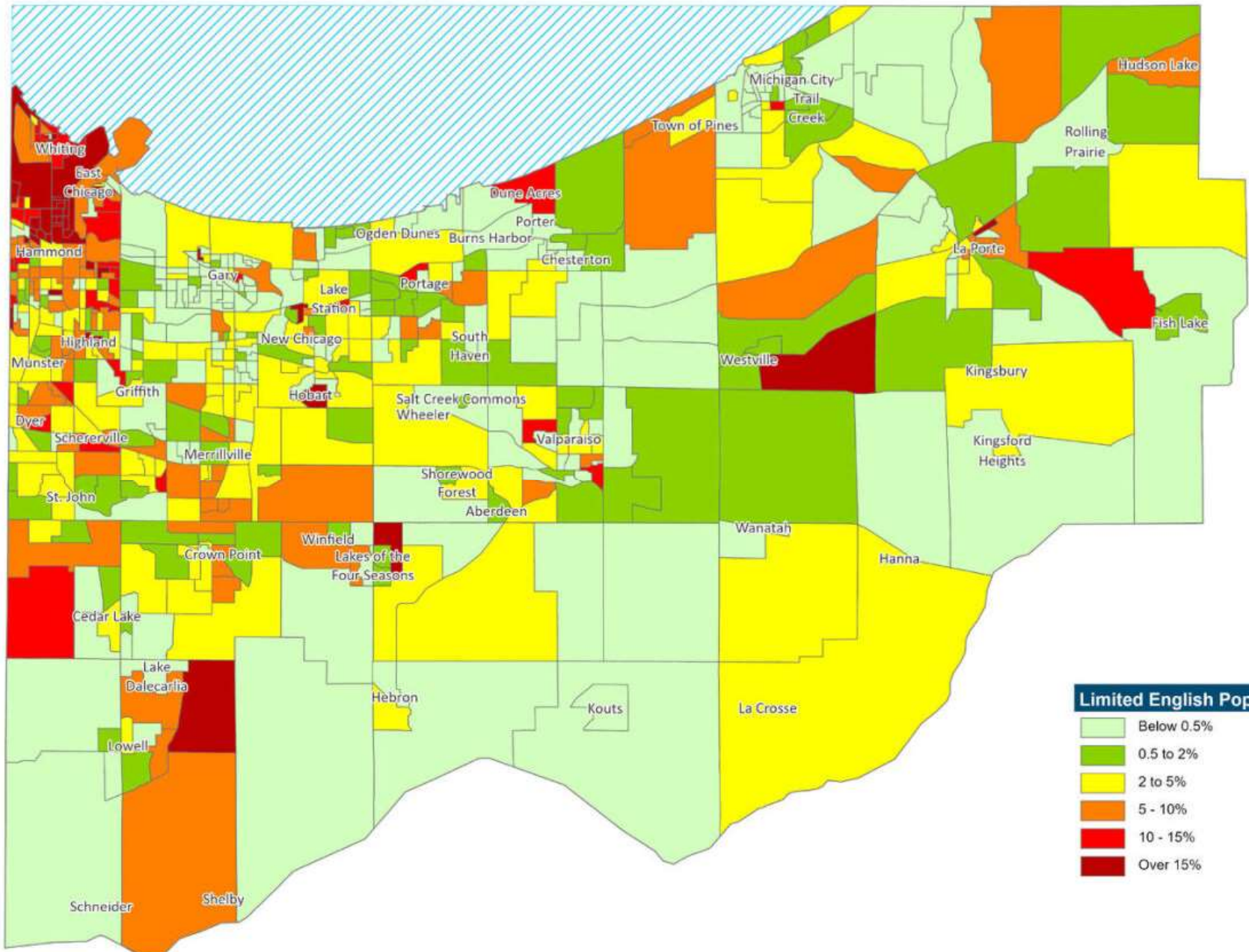
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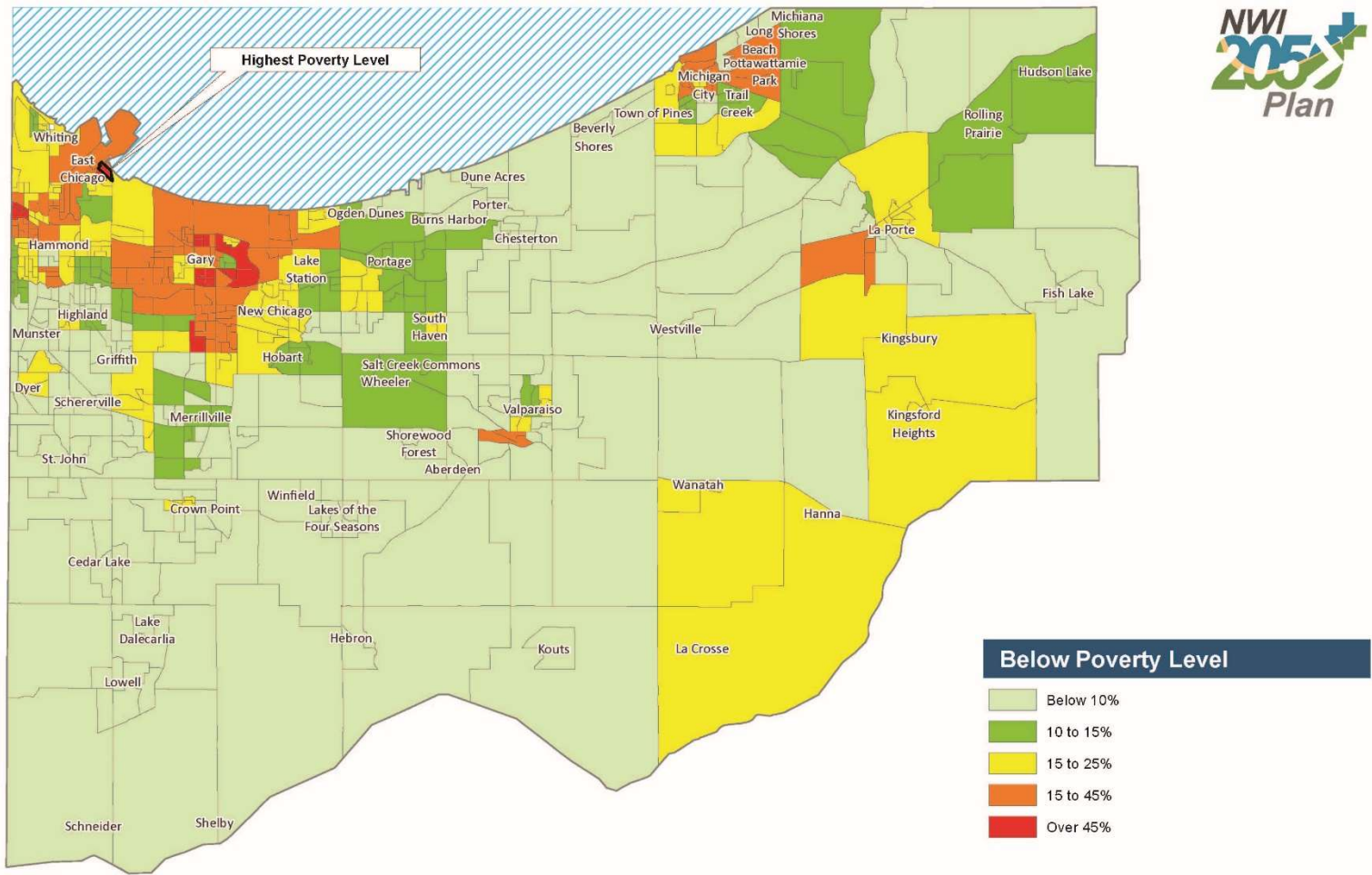
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<input type="checkbox"/>	Oznacte Lento "tvorcek, ak viete c1tat'al bo hovorit'po slovensky.	30. Slovak
<input type="checkbox"/>	Marque esta casilla si lee o habla espafiol.	31. Spanish
<input type="checkbox"/>	Markahan itong kuwadrado kung kayo ay rnarunong magbasa o magsalira ng Tagalog.	32. Tagalog
<input type="checkbox"/>	'llin1uifo-1111J1tdfN'lwfo-ithrhu ti,ul1TO'Qt11111:n"lrm.	33. Thai
<input type="checkbox"/>	Maalca 'i he puha ni kapau 'oku ke !au pe lea falcatonga.	34. Tongan
<input type="checkbox"/>	Bi):IMiThTe ll,IO KJLiTHHKY, mcrn,o DH 'lllTa Te a6o ronopHTe y1rpau1CbKOIOMODOIO.	35. Ukrainian
<input type="checkbox"/>	اگر آپ اردو پڑھتے یا بولتے ہیں تو اس خانے میں نشان لگائیں۔	36. Urdu
<input type="checkbox"/>	Xin danh <la'u vao 6 nay ne'u quy vj bie't d9c va n6i uu'(:!c Vi t gil'.	37. Vietnamese
<input type="checkbox"/>	באצייכנט דעם קעסטל אויב איר לייענט אדער רעדט אידיש.	38. Yiddish

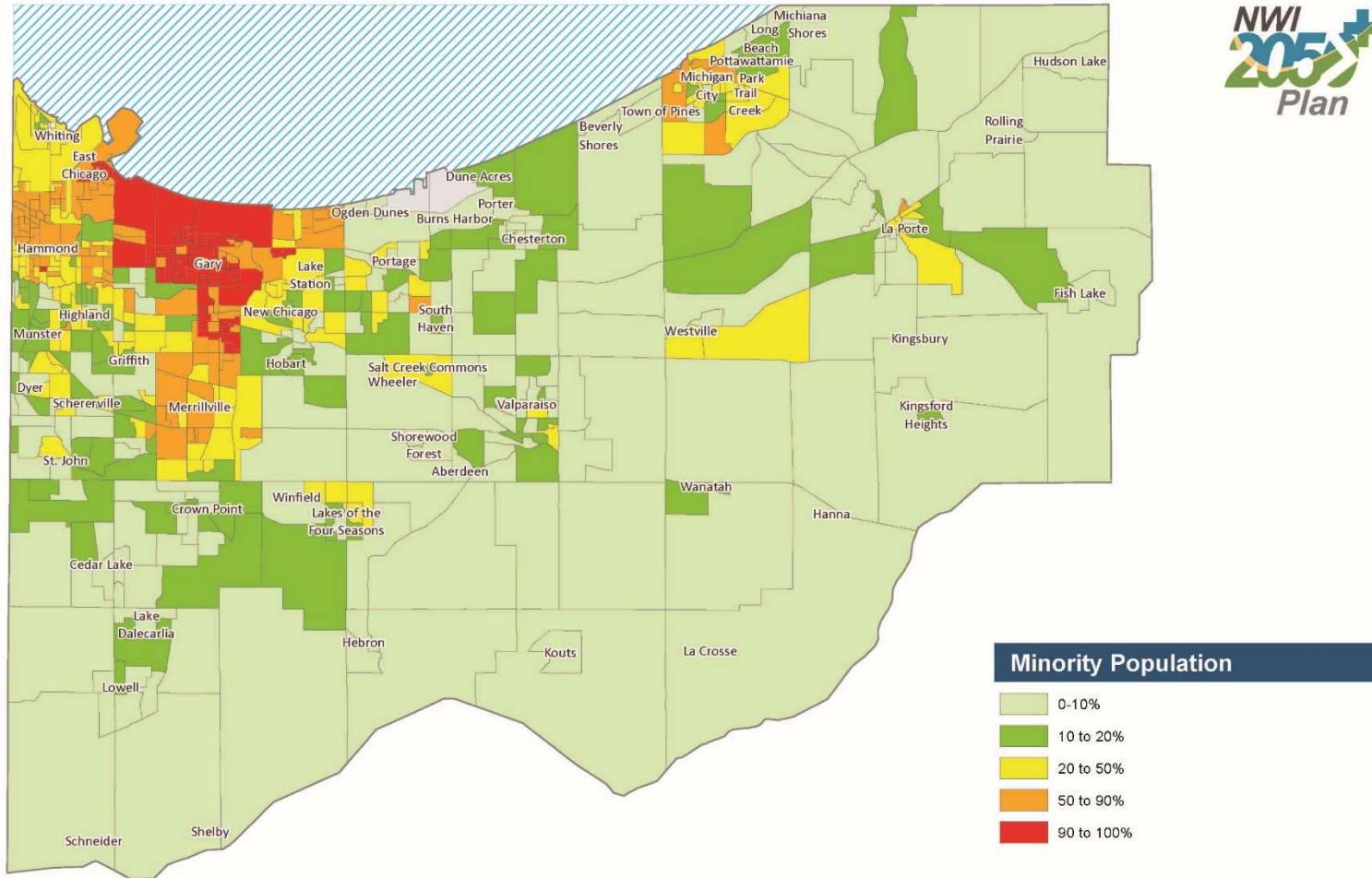
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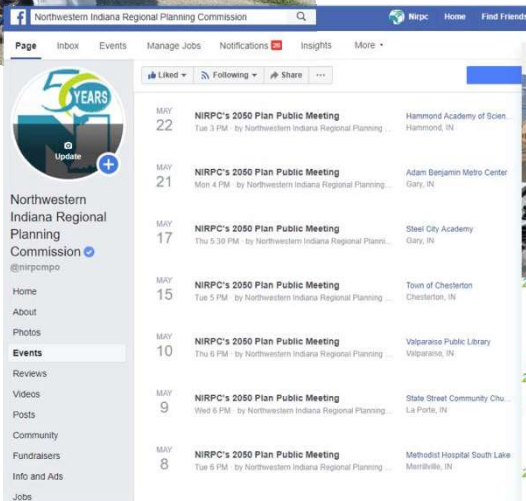
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Attachment #4: Poverty Level and Minority Population Distribution Maps







Engage NWI

Northwestern Indiana Regional Planning Commission's
Public Participation Plan – Adopted August 15, 2019 by Resolution 19-24

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About Engage NWI

Engage NWI is the federally required “Public Participation Plan” that enables Northwestern Indiana Regional Planning Commission (NIRPC) staff to ensure that it is meeting all federal requirements for public participation, but more importantly, a guide that enables the public to engage with regional planning. *Engage NWI* promotes a meaningful exchange of ideas, identification of regional issues and solutions, as well as advancing initiatives to achieve the vision for Northwestern Indiana (NWI).

The Northwestern Indiana Regional Planning Commission (NIRPC), as the Metropolitan Planning Organization (MPO) and Council of Governments (COG) for NWI, has the responsibility to conduct economic development, environmental, and transportation planning for Lake, LaPorte and Porter Counties. *Engage NWI* is required of a Metropolitan Planning Organization (MPO) by the United States Department of Transportation (USDOT) to fulfill the regulations governing public participation (**23 CFR 450.316**).

Engage NWI is laid out in a question and answer format to assist NWI’s general public and stakeholders, and NIRPC’s regional planners to understand:

- ▶ How the general public and stakeholders can most effectively connect with regional planning – **Page 3**
- ▶ What is regional planning? **Page 4-5**
- ▶ When/where is the public engaged in regional planning? **Page 6-7**
- ▶ Why is public participation important to regional planning? **Page 7-8**
- ▶ Who is and should be involved in public participation? **Page 8-10**
- ▶ How is public participation conducted? **Page 11-13**
- ▶ The technical requirements of public participation **Page 14-16**

How to follow regional planning activities and find participation opportunities:

- ▶ **Website:** nirpc.org
 - ▶ Sign-up for emails and newsletters here
 - ▶ Follow our calendar for events and meetings
 - ▶ Find NIRPC’s latest plans and updates
- ▶ **YouTube:** youtube.com/user/NIRPCPlanning
 - ▶ For livestreamed Commission and Committee meetings if you cannot or do not want to attend in-person
- ▶ **Facebook:** facebook.com/nirpcmpo
 - ▶ Like NIRPC’s Facebook page to follow planning activities and learn about engagement opportunities.
- ▶ **Twitter:** twitter.com/NIRPC
 - ▶ Follow NIRPC’s Twitter feed to hear the latest news and learn about engagement opportunities.
- ▶ **Instagram:** instagram.com/regionMPO
 - ▶ Follow NIRPC’s Instagram page to see what is going on in the region and learn about NIRPC’s work.

- ▶ **LinkedIn:** [linkedin.com/company/nirpc](https://www.linkedin.com/company/nirpc)
 - ▶ Connect with NIRPC's LinkedIn page to learn about NIRPC's work and other planning partners.
- ▶ **RTIP:** <https://rtip.nirpc.org/>
 - ▶ The Regional Transportation Improvement Program is NIRPC's online database of funded transportation investments throughout the region. Amendments are posted on RTIP when available for public comment.
- ▶ **Direct mail:**
 - To be added to our direct mail list, please send a request for newsletters:
Public Participation Planner
6100 Southport Road
Portage, IN 46368





What is regional planning?

Regional planning in NWI is conducted by NIRPC regional planners. NIRPC is charged in state law to focus on economic development, the environment, and transportation planning. NIRPC provides a regional forum to discuss issues, opportunities, problems, challenges, and concerns of member communities, the general public, and stakeholders. Regional planners work planning initiatives each year that will hopefully advance NWI towards achieving the visions laid out in the adopted long-range plan of the Commission, the *NWI 2050 Plan*.

It is important to note that while regional planners may provide guidance on best practices, policy, zoning, transportation investments, economic development, or the environment, they do not make or enforce local ordinances or policies, as NIRPC is not charged with this mandate, nor given authority to do so, in state or federal law. In order to affect change locally, participation efforts by the general public and stakeholders must be geared towards local, state or federal government. Regional planners often may not lobby under federal law, rather may only educate or guide elected officials.

For regional transportation planning, NIRPC must follow the federally required "3C" transportation planning process. The "3C" transportation planning process requires cooperation among all levels of government, comprehensive consideration of many planning factors, and be a continuously evaluated planning process. Planning is carried out following contemporary federal transportation planning requirements of the Fixing America's Surface Transportation Act (FAST Act), the Americans with Disabilities (ADA) Act, Section 504 of the Rehabilitation Act, Environmental Justice Executive Order 12898, Persons with Limited English Proficiency Executive Order 13166, the Clean Air Act, Title VI of the Civil Rights Act, and their predecessor acts. *Engage NWI* reflects all such requirements, especially those of [23 CFR 450.316](https://www.ecfr.gov/current/title-23/chapter-I/subchapter-B/part-450/subpart-316), the regulation that governs public participation.

Regional planners at NIRPC are responsible for the following:

-  *Economic development, environmental, and transportation planning*
-  *Technical assistance on planning best practices, and governance*
-  *Providing a forum for regional issues identification and problem solving*
-  *Facilitation of the prioritization of transportation investments for NWI*

Public participation and transit

Transit is an important travel option for many residents in the region, and many instances the only travel option for some residents. Transit in NWI consistently is rated by the public as a primary concern for our regional transportation system. The *NWI 2050 Plan* and the *2018 Coordinated Transit Plan* demonstrate those issues and concerns.

The Federal Transit Administration allows a transit operator to rely on the MPO's Public Participation Plan for the Transportation Improvement Program. For transit operators to be compliant with Federal "Program of Projects" requirements, transit operators may utilize the public participation efforts of regional planners. Projects need to be published in sufficient detail, and the users of these projects should be provided an opportunity to examine the proposed program and submit comments. Transit Operators therefore must assist NIRPC with public participation efforts, including advertising and inviting the public to engagement opportunities.

When/where is the public engaged in regional planning?

There are three core MPO planning documents out of which all other regional planning activities are derived:

- ▶ **Long-Range Plan (LRP)** – The LRP sets the vision for NWI and focuses on economic development, the environment, and transportation. The LRP is updated every four years and is amended from time to time. The development of the MTP takes approximately one to two years and engagement opportunities are provided throughout its development to shape the vision, goals, and priorities of the Plan.
- ▶ **Transportation Improvement Program (TIP)** – The TIP is updated every two years and amended four times per year. The TIP includes transportation

investments for the next five years made by communities, transit operators, and the Indiana Department of Transportation. The development of the TIP involves all the towns, cities, counties, and transit operators of NWI and must be consistent with the *NWI 2050 Plan*. Direct engagement with municipalities and transit operators is the most effective way for the public to influence the projects each applicant submits to NIRPC for funding.

- ▶ **Unified Planning Work Program (UPWP)** – The UPWP is updated every two years and amended in between generally once. The UPWP contains all the planning activities required by the Federal Highway and Transit Administrations in addition to planning activities identified by the *NWI 2050 Plan*. The planning tasks are conducted by the regional planners at NIRPC. Each UPWP task includes a public participation goal appropriate for the task: Inform, Consult, Involve, or Collaborate. **See page 12 for details on goals.**

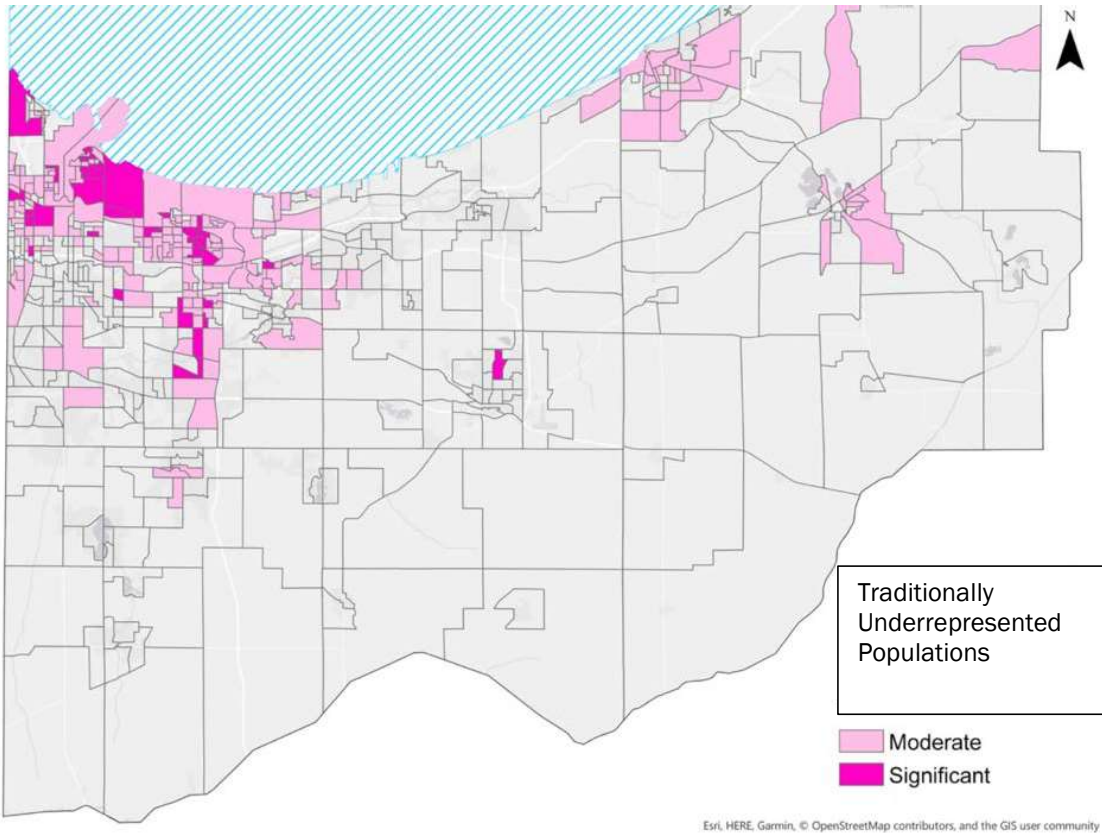
Understanding the core planning activities of NIRPC will help to connect interested individuals on when and where to engage in regional planning.

Engage NWI emphasizes that for effective regional planning, engagement should occur where people are, and early in the process. Input will be solicited from the general public and stakeholders when active engagement methods are utilized (described on Page 13), close to where the general public are already gathering and while plans are in development so that input can shape the outcome which is deliberated at the Commission. Every attempt will be made to hold active engagement activities throughout the region, balanced where transit is available and for the rest of the region, through a variety of creative means while plans are in development. The Commission will determine where and when to hold its meetings and those of its advisory and business committees.

Why is public participation critical to regional planning?

Engage NWI stresses the need for the general public and stakeholders to engage in regional planning to identify regional challenges, problems, and opportunities. Regional planners need to listen to voices of the general public and stakeholders to gain a diversity of input – especially from those traditionally underrepresented in planning processes – and hear potential solutions or to shape planning processes and achieve desired outcomes. The map on Page 9 represents the places in NWI that should be emphasized in engagement efforts. These places include higher than regionally average areas of minorities, low-income individuals, limited-English proficiency individuals, zero-car households, veterans, individuals over sixty-five years of age, and individuals with disabilities. Regional planners need input early in the process so that final plans can reflect a balance of priorities and interests heard from all over the NWI.

Engage NWI stresses the importance that additional effort be made to invite individuals that reside in such areas to participate in regional planning efforts to give voice to communities who have traditionally been under-represented.



Strategies to engage with emphasized places in NWI

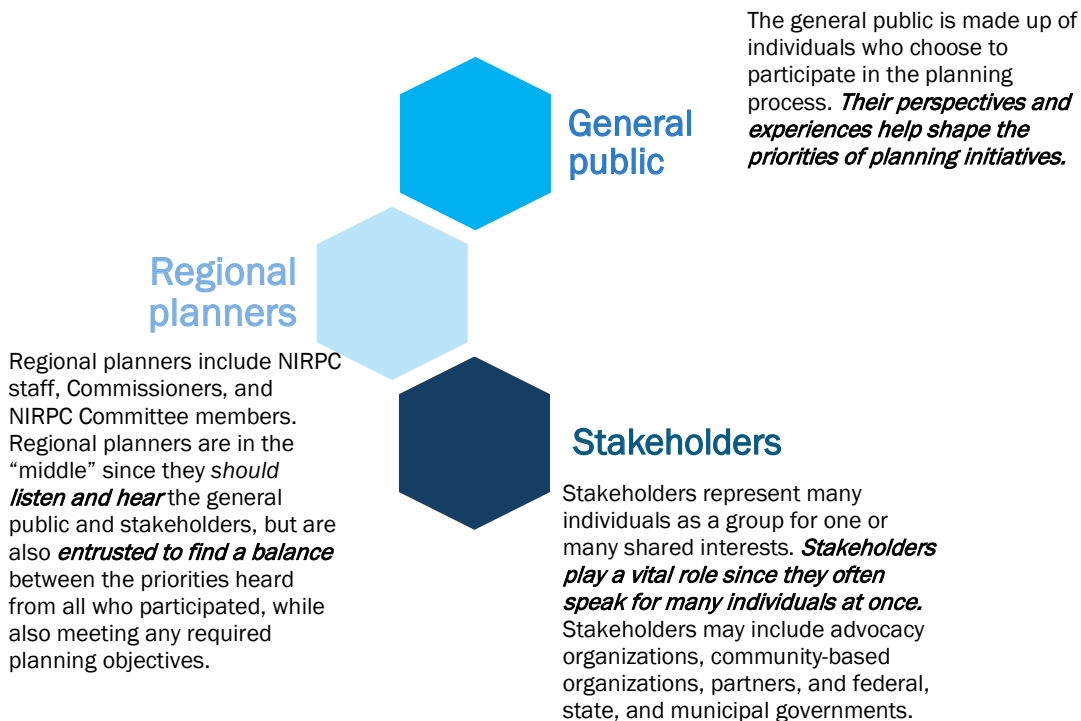
- ▶ **One-on-Ones** – depending on the planning activity, regional planners may make face-to-face contact with community-based organizations, neighborhood leaders, faith-based organizations, elected officials, and other important stakeholders that can connect regional planners to residents and businesses that have been underrepresented in regional planning activities. Such interactions are called “*Out and Abouts*” in *Engage NWI* and are described on Page 13.
- ▶ **Targeted formal engagement** – depending on the planning activity, regional planners may ensure that some of the formal meetings or “*Pop-Up Events*,” described on Page 13, are held in these emphasized places to make participation convenient, especially if community residents rely on limited public transit.

Who is and should be involved in public participation?

Engage NWI focuses upon “regional planners,” “the general public,” and “stakeholders” as three critical groups involved in public engagement. Each plays a unique and important role in the planning process. Regional planners at NIRPC seek to undertake various planning initiatives that need to be shaped by public input. The general public includes individuals and businesses that represent themselves in the planning process, while stakeholders represent “grouped” interests, needs, or desires in the outcome of a planning process. The perspectives, experience, and expertise from the general public, or stakeholders, is not only welcomed, but necessary in the planning process.

Shaped by their personal experiences, regional planners do not know and cannot see every detail of every issue in every community. Therefore, *Engage NWI* stresses the need for regional planners to listen to the general public and stakeholders as a duty, but also for the general public and stakeholders to share their perspectives, experiences, and expertise as regional citizens.

For *Engage NWI* to be effective, NIRPC, as the regional planners, will inform the general public and stakeholders of every opportunity to participate through the channels described on Page 3; however, the general public and stakeholders have the freedom to take advantage of the opportunity to play their part and actively engage in shaping their region.



About the regional planners - NIRPC

Regional planning and coordination came to Northwestern Indiana in 1965 when enabling legislation was passed by the Indiana General Assembly and signed into law by the Governor. The first state law called for a transportation planning commission, which was inspired by the 1962 Federal Highway Act. The state law has since been amended to create what is known today as the Northwestern Indiana Regional Planning Commission, a three-county council of governments. In 2007, NIRPC's Executive Board membership expanded, and weighted voting added.

NIRPC's governing body is the Commission composed of 53 county, municipal, and some township elected officials and a Gubernatorial appointment. The Commission membership is established in state statute and is required to meet in full at least four times per year and at a minimum statutorily responsible for the hiring of the Executive Director, adopting bylaws, electing officers, and annual budget appropriations. A smaller Executive Board is annually elected by and from the full Commission membership and takes on the routine business of NIRPC. The Commission has established several committees to make advice and assist in conducting its business along with lower topical committees focused on specific interests. Please check NIRPC.org for updates on the committee structure and membership.

All Commission and committee business related to transportation planning and investment decision-making must adhere to *Engage NWI*. Planning for economic development and the environment may adhere to *Engage NWI* or the specific requirements of grants funding those activities in question. Noticing for Commission and Committee meetings will follow Indiana Open Door Law.

Commission	Full Commission <i>Meets four times per year or</i>
	Executive Board <i>Meets approximately six times per year</i>
Advisory / Business Committees	Technical Planning
	Local Government Assistance
	Legislative
	Finance and Personnel
Topical Committees	Environmental Management and Policy
	Ped, Pedal, and Paddle
	Land Use
	Surface Transportation
	Transit Operators
	Transportation Resources Oversight

*Last revised February 2018 / Any future changes to committee structure made by the Commission will be reflected in **Engage NWI** as a technical amendment.*

How is public participation conducted?

Engage NWI lays out on Page 12 the engagement goals, the promise made by *Engage NWI* associated with that goal, engagement methods associated with each goal, and the when the goal will be chosen for each planning task. Then all the technical requirements of *Engage NWI* are laid out (Page 14-16). Input from the general public and stakeholders early in the process is critical to shaping the final outcomes of each plan. With a diversity of perspectives in a region as large as NWI, it will be up to regional planners to find a balance between competing priorities and interests for the region. Before plan adoption by the Commission, the plan will be put out for a formal comment period, if required.

Techniques to invite participation

Engage NWI outlines methods to ensure regional planning is conducted with participation always at mind from the beginning of planning processes. Each planning task undertaken will identify a participation goal appropriate for that task (Page 12) and then planners will employ the methods that goal requires. It is expected that most tasks will be on the more participatory end of the spectrum.

However, no matter which type of participation goal that is required, participation will be possible in formats that are inclusive. All meeting locations will be compliant with the ADA and requests for reasonable accommodations taken upon request within 72 hours of a formal meeting to ensure participation those who may need alternate formats of materials – including language translation, foreign, American Sign Language, or braille.

Active participation methods				
Does the task require?	Inform	Consult	Involve	Collaborate
Engage NWI goal:	Provide public with objective information and assist their understanding of regional challenges, options, opportunities, or solutions.	Obtain feedback on regional planning tasks, analyses, or prior to policy making.	Work directly with public and stakeholders throughout planning process to ensure concerns and ideas are consistently understood and considered.	Partner with the public and stakeholders in every aspect of the planning process from project scoping through adoption of plans or policies.
Engage NWI promise	Keep general public and stakeholders informed.	Keep public informed, listen and acknowledge concerns and ideas, and provide public with report on how input shaped outcomes.	Work with public and stakeholders to ensure goals and ideas are directly reflected in planning work as much as possible and report on how input shaped outcomes.	Work with public and stakeholders to inform planning work from start at project scoping to understand issues, generate solutions, and incorporate feedback to shape outcomes.
Involvement methods / tools may include:	Website, social media, newsletters, multi-language publications, press releases, mailings, live streaming, white papers, or fact sheets.	Activities listed in “Inform” plus surveys, comment forms, webinars, or formal meetings	Activities listed in “Consult” plus focus groups, targeted outreach to meet people where they are such as “Out and Abouts,” or “Pop-up Events”	Activities listed in “Involve” plus task forces, charrettes, keypad polling, and working groups
When goal will be selected:	The “Inform” level of participation will be used for technical documents, but the methods will be used frequently to communicate regularly with the public	The “Consult” level of participation will be used less frequently, but the methods will be used when needed	The “Involve” method will be used frequently and the methods as well	The “Collaborate” method will be used frequently with major planning processes

Examples of active engagement

Some types of active and in-person engagement will be conducted by employing the following:

- ▶ **“Out and Abouts”** – regional planners meeting face-to-face to invite interest in planning activities, events or to solicit direct feedback
- ▶ **“Pop-up Events”** – regional planners sharing information / asking for feedback at other organization’s events
- ▶ **Formal meetings** – advertised open houses or public hearings – **timely notice per *Engage NWI* for all public meetings listed in the table to the right will be two weeks prior to the meeting.**
- ▶ **Task force / working groups** – invited and targeted participation of subject matter experts at the discretion of the NIRPC Executive Director

Effectiveness of methods and evaluation

From time to time the strategies and methods contained within *Engage NWI* will be reviewed for their effectiveness. The principal measure for effectiveness of *Engage NWI* will be:

- ▶ The frequency in which planning activities are conducted with the “Involve” or “Collaborate” goal of active participation methods described on Page 12 – should be at least 50% of activities; and
- ▶ How aggressively regional planners have made attempts to invite participation from the general public and stakeholders throughout the planning process. Opportunities include advertising, “*Out and Abouts*,” “*Pop-Up Events*,” social media or newsletter content, etc.

A summary of public participation efforts by regional planners will be published in the “Performance Report” recommended in the *NWI 2050 Plan*.

Technical aspects of public participation:

Public comment periods and public meeting requirements Core planning documents	Minimum comment period by law	Engage NWI comment length policy	Engage NWI formal meeting policy
Long-range plan (new adoption)	Not specified in federal law	30 days	Required
Long-range plan Policy/Project amendment		21 days	Not required
Long-range plan Modification / Technical amendment		None	Not required
Transportation Improvement Program (TIP) (new adoption)		30 days	Required
TIP amendment		21 days	Not required
TIP modification / technical amendment		None	Not required
Air Quality Conformity		30 days	Required
Unified Planning Work Program (new or amendment)		None	Not required
Coordinated Public Transit Human Services Transportation Plan (new or amendment)		21 days	Not required
Public Participation Plan (new or amendment)	45 days	45 days	Not required
Other planning and policy documents			
Regional and sub-regional modal, corridor, development, or environment plans/policies	Not specified in federal law	21 days	Not required
Technical documents required to fulfill federal requirements		None	Not required

Amendment and modification procedures

Amendment:

- ▶ 1) any phase of any project is added or construction phase or transit project deleted;
- ▶ 2) any addition of funds over \$100,000;
- ▶ 3) change to an air quality non-exempt project;
- ▶ 4) project scope change that alters original intent of project;
- ▶ 5) change to policy or programming rules.
- ▶ Interagency Consultation Group review on *all* TIP amendments and a redetermination of fiscal constraint is required. **Twenty-one-day comment period required.**
- ▶ Must be approved by Commission or Executive Board. **Public comment opportunity is available at the meeting.**

Modification:

- ▶ 1) project moving year to year (but not out of the TIP, which is an amendment);
- ▶ 2) project fund source change;
- ▶ 3) project is split into multiple construction segments;
- ▶ 4) addition of funds under \$100,000 (TIP and UPWP); *or*
- ▶ 5) typographical changes.
- ▶ Modifications are made by NIRPC staff at the request of project sponsor subject to regulation and funding availability.
- ▶ A redetermination of fiscal constraint is required.

Technical Amendment:

- ▶ Changes to technical information that does impact policy or programmed projects, ie: performance targets, data updates, asset information.
- ▶ Must be approved by Commission or Executive Board. **Public comment opportunity is available at the meeting.**

Emergency Amendment:

- ▶ NIRPC Executive Director authorizes a TIP amendment without public process or Commission if:
 - ▶ 1) public well-being or safety is at risk; or
 - ▶ 2) lapse or loss of federal funds is at risk.
- ▶ A redetermination of fiscal constraint is required.

Path to address public comments

Comments received during a comment period will be reported to the Commission via a “Public Comment Report.” The Report will be made available on the NIRPC website and included with draft plans before adoption. The Report will constitute the formal response to comments and will contain the following: **1)** the original comment, as received; **2)** a recommendation by staff on how the final plan may address the substance of the comment; and **3)** a notation on whether or not the recommendation is a major or minor revision.

Any such recommendation to revise a draft plan that proposes: **1)** Policy revisions; **2)** Adds a project not previously subjected to public review; or **3)** deletes a project subjected to public review, will be considered a major revision and will trigger an additional public comment period. All other recommendations will be regarded as minor revisions representing comments that are more general. Advisory Committee(s) or the Commission will consider recommendations at their discretion.

Public Comment Period (per *Engage NWI* policy)

Recommended major revisions?

The commission may accept or modify major revisions and start new full comment period

The Commission may reject major revisions and adopt the plan

Recommended minor revisions?

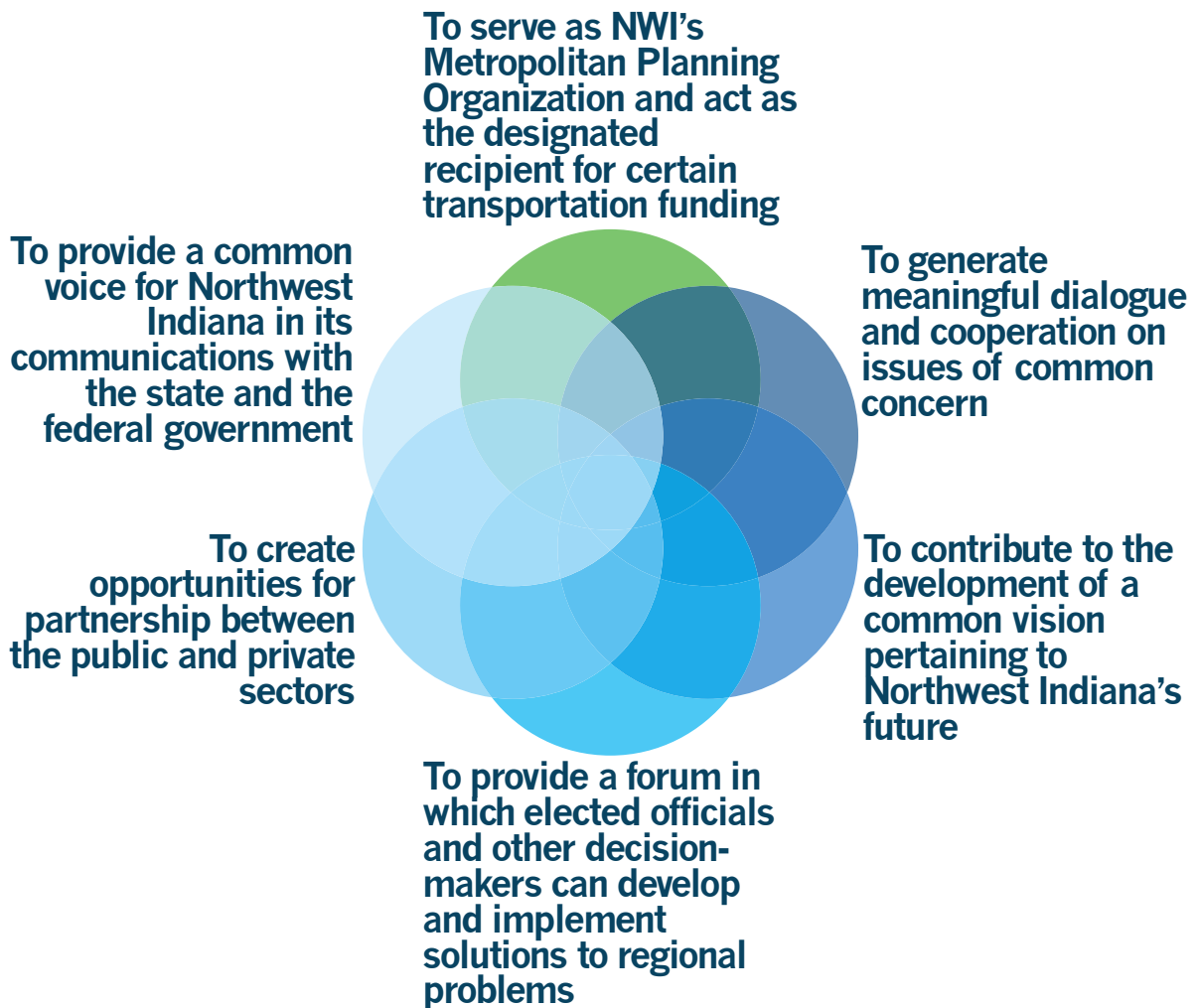
The Commission may accept, reject, or modify minor revisions and adopt the plan

Second Public Comment Period (per *Engage NWI* policy)

The Commission may accept, reject, or modify major revisions and adopt the plan. *Public engagement ends.*

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NIRPC's Role in the Region



For more information:

Visit:

www.nirpc.org

Contact:

Public Participation Planner at comments@nirpc.org
or 219-763-6060

Request alternative formats of plans or meeting materials:

nirpc@nirpc.org or 219-763-6060

Subrecipient Title VI Programs

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PROFILE: EAST CHICAGO TRANSIT (ECT) SYSTEM

General Information

Main office

5400 Cline Ave.

East Chicago, IN 46312

(219) 391-8465 [office]

(219) 391-8473 [fax]

Web Site: <http://www.eastchicago.com/page10/page90/index.html>

Director

Francisco Rosado, Jr.

Email: frosado@eastchicago.com

Service Area

East Chicago City limits with service to the Griffith Plaza in Griffith, Indiana and the Woodmar Mall in Hammond, Indiana.

Service Population

29,698 (as per Census 2010 data)

Entity Description

East Chicago Transit (ECT) is the municipal transit system serving the City of East Chicago. ECT is established and functions as a city department.

Transportation Service Description

ECT operates a fixed route transit service within the City of East Chicago. The service operates between the hours of 5:55 am and 8:44pm, Monday through Friday; and 9:00 am to 4:31 pm on Saturday. ECT has four (4) fixed routes Monday through Friday and three (3) fixed routes on Saturday. ECT also offers complementary paratransit service to eligible participants in the service area. In addition, ECT offers interconnections with the South Shore commuter rail line and Gary transit systems. ECT does not charge a fare to its passengers.

FTA Assistance

Currently, ECT receives financial assistance from the FTA in the form of a reimbursement for the capital cost of maintenance associated with running their transit system. With the exception of vans #2011A & #2011B which provides paratransit service, all rolling stock used by ECT was purchased with FTA funding. This includes five (5) fixed route buses, one (1) passenger van, two (2) paratransit vans (BOC), one (1) service truck and one (1) staff vehicle.

General

Purpose

Section 601 of Title VI of the Civil Rights Act of 1964 states the following:

“No person in the united states shall, on the grounds 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.”

To achieve this purpose, each Federal department and agency which provides financial assistance for any program or activity is authorized and directed by DOJ to effectuate provisions of Title VI for each program or activity by issuing generally applicable rules, regulations, or requirements.

In this regard, the responsibility of Federal Transit Administration is to ensure that applicants, recipients, and sub recipients of Federal Transit Administration assistance in a manner consistent with Title VI distribute federally supported transit services and related benefits. The employment practices of a grant applicant, recipient, or sub recipient are also covered under Title VI if the primary purpose of the Federal Transit Administration supported program is to provide employment or those employment practices would result in discrimination against beneficiaries of Federal Transit Administration assisted services and benefits.

Objectives

The objectives of the Federal Transit Administration Title VI program are as follows:

1. To ensure that Federal Transit Administration assisted benefits and related services are made available and are equitably distributed without regard to race, color, or national origin.
2. To ensure that the quality of Federal Transit Administration assisted transit services are sufficient to provide equal access and mobility for any person without regard to race, color, or national origin.
3. To ensure that opportunities to participate in the transit planning and decision-making processes are provided to persons without regard to race, color, or national origin.
4. To ensure that decisions on the location of transit services and facilities are made without regard to race, color or national origin; and
5. To ensure that corrective and remedial action is taken by all applicants and recipients of Federal Transit Administration assistance to prevent discriminatory treatment of any beneficiary based on race, color, or national origin.

Definitions

Applicant: means an eligible public entity or organization that submits an application for financial assistance under any Federal Transit Administration program

- **Closed-Door Rule Segment:** means that portion of a transit route in which there are no bus stops to board or disembark.
- **Compliance:** refers to a condition in which Federal Transit Administration has found that the applicant, recipient or sub recipient has met the requirements in this circular, and there is no indication or evidence of discrimination on the basis of race, color, or national origin.
- **Contractor:** means any entity or organization that has entered into a contract relating to transit service delivery with an applicant, recipient or sub recipient.
- **Covered Employee Practices:** refers to practices under federally assisted programs in which the primary objective of the Federal financial assistance is to provide employment or if those practices would result in discrimination on basis of race, color or national origin against beneficiaries of federally assisted service and benefits.
- **Discrimination:** refers to any intentional or unintentional act, or any failure to act which has the effect of excluding or denying a person from participation in benefits, or has otherwise subjected a person to unequal treatment under any program or activity because of race, color or national origin.
- **Minority or Minority Group Persons:** include the following
 1. *“Black Americans”*- which includes persons having origins in any of the Black racial groups of Africa;
 2. *“Hispanic Americans”* – which includes persons of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish or Portuguese culture or origin, regardless of race;
 3. *“Native Americans”* – which includes persons who are American Indians, Eskimos, Aleuts, or Native Hawaiians;
 4. *“Asian – Pacific”* – which includes persons whose origins are from Japan, China, Taiwan, Korea, Vietnam, Laos, Cambodia, the Philippines, Samoa, Guam, the U.S. Trust Territories of the Pacific, and the Northern Mariana’s; and
 5. *“Asian-Indian Americans”* – which includes persons whose origins are from India, Pakistan, and Bangladesh.

- **Minority Transit Route:** means a route that has at least 1/3 of its total route mileage in a census tract(s) or traffic analysis zone(s) with a percentage of minority population greater than the percentage of minority population in the transit service area.
- **National Origin:** means the particular Nation where a person was born, where the person's parents or ancestors were born.
- **Noncompliance:** means a failure to meet the requirements of Title VI and the regulations and orders of the Department issued there under or failure to implement an approved Title VI program.
- **Non-minority or Non-minority Group Persons:** means a White person, not of Hispanic origin, having origins in any of the original peoples of Europe, North Africa, or Middle East.
- **Primary Recipient:** means any recipient that is authorized or required to request Federal assistance on behalf of sub recipients, and distributes such financial assistance to sub recipients for the purpose of carrying out a program.
- **Probable Noncompliance:** refers to a condition in which Federal Transit Administration has found that the applicant, recipient, or sub recipient does not fully satisfy these requirements and has requested that applicant, recipient, or sub recipient to take remedial or corrective actions to achieve compliance; or has initiated an enforcement action against the applicant, recipient, or sub recipient.
- **Recipient:** means any State, political subdivision, instrumentality, or any public agency, institution, department or other organizational unit, to whom financial assistance is directly extended by Federal Transit Administration.
- **Secretary:** means the Secretary of the DOT
- **Service Standard/Policy:** means an established policy of service performance measure used by a transit provider or other applicant, recipient, or sub recipient as a means to plan, program, or distribute services and benefits within its service area.
- **Subcontractor:** means any entity or organization, which has entered into a subcontract relating to transit service delivery with a contractor to provide a service in connection with a program or activity initiated by an applicant, recipient, or sub recipient.
- **Sub recipient:** means any entity that receives Federal Transit Administration financial assistance through a primary recipient.

- **Title VI Program:** means the system of requirements, procedures, actions and sanctions adopted by the Federal, State, and local agencies and other applicants, recipients, and sub recipients which are deemed necessary and appropriate to comply with Title VI of the Civil Rights Act of 1964, and the implementing regulations issued by DOJ and DOT.
- **Travel Time:** means the total travel time form an origin location in a census tract/traffic analysis zone to a destination in another or same census tract/traffic zone and includes or equals the sum of the following components:
 1. The walking time or riding time, in a private vehicle, from the origin location in a census tract/traffic analysis zone to the transit access location (called out-of-transit vehicle travel time), calculated at a walking speed of 3 miles per hour, or a riding speed of 25 miles per hour.
 2. The average scheduled in-transit vehicle peak hour travel time or total travel time where no more than one vehicle to the same destination is involved;
 3. The waiting time(s) calculated as $\frac{1}{2}$ the headway(s), and, if transfers are required, the sum of the waiting times for each transfer made; and
 4. The walking or riding time from the transit egress location to the destination location, again at a walking speed of 3 miles per hour or a riding speed of 25 miles per hour.
- **Federal Transit Administration Activity:** means any program of assistance authorized by sections of the UMT Act; the Federal Aid Urban System Program (23 USC 142(a)(2)); and the Interstate Transfer Program (23 USC 103(e)(4)).

**Title VI Requirements to Federal Financial Assistance of the
Federal Transit Administration**

1. Any person who is, or seeks to be, a patron of any public vehicle which is operated as a part of, or in conjunction with, a project shall be given the same access, seating, and other treatment with regard to the use of such vehicle as other persons without regard to their race, color, or national origin.
2. No person who is, or seeks to be an employee of the project sponsor or lessees, concessionaries, contractors, licensees, or any organization furnishing public transportation service as a part of, or in conjunction with, the project shall be treated less favorably than any other employee or applicant with regard to hiring, dismissal, advancement, wages, or any other conditions and benefits of employment, on the basis of race, color, or national origin.
3. No person or group of persons shall be discriminated against with regard to the routing, scheduling, or quality of transportation service furnished as a part of the project on the basis of race, color, or national origin. Frequency of service, age and quality of vehicles assigned to routes, quality of stations serving different routes, and location of routes may not be determined on the basis of race, color, or national origin.
4. The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin.

Coverage

General

East Chicago Transit (ECT) as a sub recipient of Federal Transit Administration assistance shall comply with Title VI requirements applicable to their system. ECT is subject to both of the main reporting requirements established: (1) General Reporting Requirements, and (2) Program-Specific Reporting Requirements. *[DOJ – 28 CFR Part 42, Subpart F & DOT 49 CFR Part 21]*

ECT is required by DOJ and DOT to implement Title VI by reporting collected data and other information to FTA. ECT will provide updated reports every 5 years.

General Requirements

- At this time there are not any active lawsuits or complaints naming ECT, which allege discrimination on the basis of race, color, or national origin with respect to service or other transit benefits.
- No other Federal financial assistance is currently being provided by any Federal agency other than FTA.
- ECT has not had any civil rights compliance reviews during the last 3 years.
- The most current Annual Certifications & Assurances was signed on January 25, 2017.

Program Specific Requirements for Urbanized Zone Areas of 200,000 or More

- ECT shall prepare demographic and service profile maps, overlays, and charts as outlined below after each Federal census or as soon thereafter as possible, or after there are significant changes in the transit system.
- Maps and overlays; to identify each census tract (see Exhibit I)
- Population/Racial Distribution Chart for each census tract
- ECT will use the following 5 transit service indicators to monitor Title VI compliance:
 1. Vehicle Load- is a ratio of the number of seats on a vehicle to the number of passengers. The load factor is an indicator of the extent of probable overcrowding or the need for additional vehicles.

2. Vehicle Assignment- refers to the process by which transit vehicles are assigned to routes throughout ECT service area.
3. Vehicle Headway – is a measurement of the time interval between 2 vehicles traveling in the same direction on the same route. The frequency of service is a general indicator of the level of service provided along a route and a factor in the calculation of the amount of travel time expended by a passenger to reach his/her destination.
4. Distribution of Transit Amenities - refers to items of comfort and convenience available to the general riding public such as signage and shelters
5. Transit Access - is a measure of the distance a person must travel to gain access to ECT. Transit access is a general measure of the distribution routes within ECT service area.

Assessment of Compliance

In compliance with FTA Title VI guidelines, the Director of ECT will be responsible to review the local service standards established above (transit service indicators), for compliance.

Procedures and guidelines to monitor compliance with Title VI and identify possible areas of noncompliance are listed below. ECT will review transit services provided to minority groups on a biennial basis in conjunction with the MPO biennial review process.

ECT's internal guidelines for making a determination of compliance with Title VI will include two types of monitoring:

1. Level of Service Monitoring – The design of each ECT route will be compared to census tracts with a high concentration of minority population to determine the level of service provided within these tracts. Presently, 84% of the total population of the City of East Chicago represents minorities; of the 10 census tracts located in the city all have minority populations over 50%. The census tracts located along ECT's service routes outside the city limits have minority populations at approximately 25% (see Table 1).
2. Quality of Service Monitoring – Making the ECT system more responsive to rider needs is a continuing process that requires input from our riders. To comply with Title VI, a survey will be conducted annually to determine travel patterns and opinions on the quality of service provided. The survey will include passenger responses relative to the quality of service provided by ECT; i.e. travel patterns of transit users in selected census tracts, a summary of comments regarding transit

service, and the identification of the top 3 most traveled destinations using the following: (1) average peak travel time to destinations, and (2) the number of transfers/bus stops before reaching destinations.

A comparison of the survey results relative to the selected tracts will be conducted to determine if the quality of service within minority tracts is comparable to that provided in non-minority tracts. Corrective action will be taken in all cases in which service to minority areas does not meet ECT's service policies and standards.

Other Areas of Title VI Consideration

ECT uses local newspapers, radio stations, various community organizations, and ECT fleet to disseminate information to the citizens of the City of East Chicago.

Currently, the Director of ECT is of Hispanic origin. ECT also utilizes Spanish-speaking staff in communicating route information to passengers when they call the office, and when attending community meetings. Transit schedules are printed in both English and Spanish due to the fact that a large percentage of East Chicago Transit's ridership is of Hispanic origin. A Title VI statement of rights and complaint handling procedures is posted at the central garage for all employees to see and is available at East Chicago Transit's main office.

Discrimination Complaint Process

It is the policy of the City of East Chicago to comply with FTA regulations regarding Title VI. Questions regarding Title VI or discriminatory practices or matters should be directed to the East Chicago Law Department for further assistance, 4525 Indianapolis Blvd.; East Chicago, IN 46312; phone (219) 391-8291. The complaint must be filed within 90 days from the date of occurrence of the alleged Discriminatory Practice and it must be notarized.

By: _____
Signature

Attest: _____
Signature

Printed Name

Printed Name

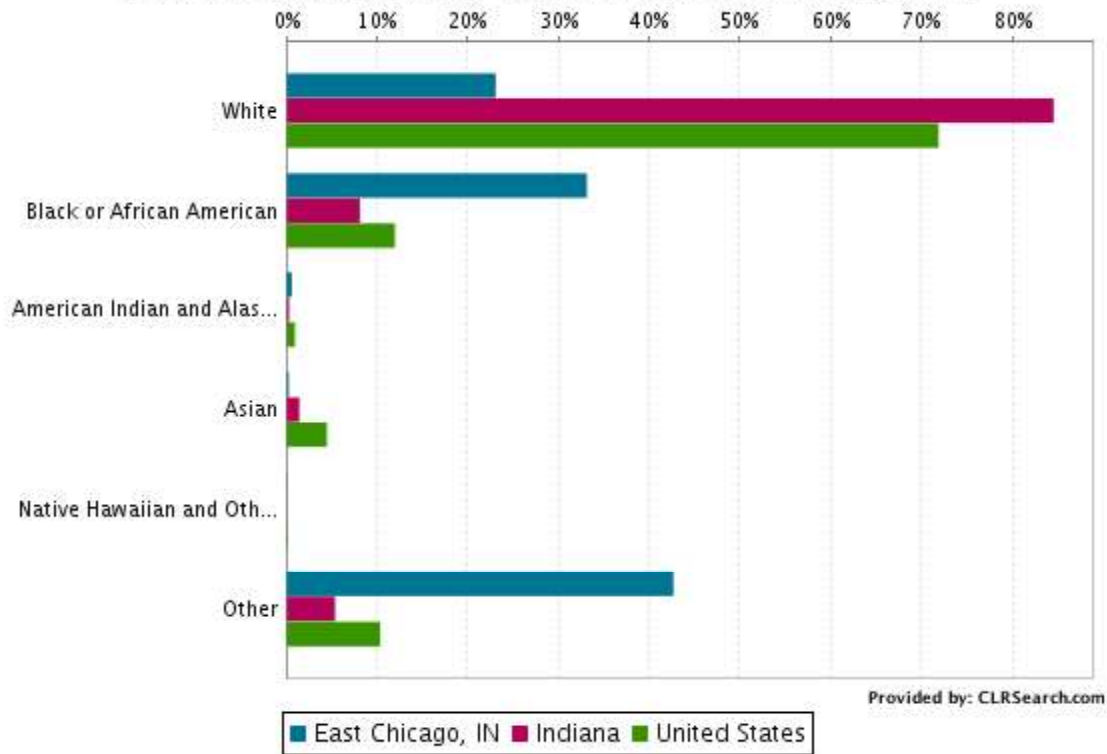
Title

Title

Table I

- Population by Race and Ethnicity

2010 Population by Race for East Chicago, IN



2010 Population by Race and Ethnicity	East Chicago, IN		Indiana		United States	
Population by Race						
White	6,630	23.11%	5,449,749	84.59%	221,809,059	71.91%
Black or African American	9,514	33.16%	524,437	8.14%	37,036,996	12.01%
American Indian and Alaska Native	185	0.64%	21,777	0.34%	3,026,418	0.98%
Asian	88	0.31%	94,701	1.47%	13,906,406	4.51%
Native Hawaiian and Other Pacific Islander	28	0.10%	3,755	0.06%	662,031	0.21%
Other	12,248	42.69%	348,424	5.41%	32,014,224	10.38%

2010 Population by Race and Ethnicity	East Chicago, IN		Indiana		United States	
Population by Ethnicity						
Population Hispanic	18,683	65.11%	353,730	5.49%	49,511,501	16.05%
Population Non Hispanic	10,010	34.89%	6,089,113	94.51%	258,943,633	83.95%

The data for East Chicago, IN may also contain data for the following areas: East Chicago

Race versus Ethnicity: According to the Census, race and ethnicity are considered two separate and distinct identities. Hispanic or Latino origin is asked as a separate question and categorized under ethnicity. In addition to their race and/or races, all respondents are categorized by one of two ethnicities, which are "Hispanic" and "Non Hispanic."

Hispanic Ethnicity: According to the Census, people of Hispanic origin, were those who indicated that their origin was Mexican, Puerto Rican, Cuban, Central or South American or some other Hispanic origin. It should be noted that people of Hispanic origin may be of any race.

Exhibit II Complaint Appeal Process

How to File a Complaint to East Chicago Transit (ECT)

A person with a complaint may submit the complaint to ECT using the following procedures.

A complaint may be submitted in writing and must include the person's name and contact information, the date of the incidence, and the identity of the person or department or service that caused the complaint. Complaints may be sent via mail, email, fax or hand delivered.

A complaint may be taken verbally and must include the person's name and contact information, date of the incidence, and the identity of the person, department or service that caused the complaint.

Persons with a complaint may request a neutral third party (East Chicago Law Department) to hear a verbal complaint or assist with a written complaint. The selection of the neutral third party shall be made cooperatively between ECT and the person filing the complaint.

All complaints shall be addressed to the ECT.

ECT Complaint Procedure

The person filing a complaint will be informed that the complaint be filed directly with ECT. ECT shall be responsible for follow up and monitoring the complaint.

If the complaint is valid and supported by facts, ECT will order corrective action be taken.

The person who filed the complaint will be consulted as to the adequacy of the proposed remedy. If acceptable, the matter is concluded.

If the proposed remedy is not acceptable, the person who filed the complaint may appeal with East Chicago Law Department, 4525 Indianapolis Blvd., East Chicago, IN 46312, 219-391-8291 for purposes of stating their complaint and identifying an appropriate remedy.

East Chicago Law Department will provide further assistance.

If acceptable, the matter is concluded. If not, the person is again advised of the appropriate steps to file the complaint by East Chicago Law Department.

ALTERNATE FORMAT AVAILABLE UPON REQUEST



2020 Title VI Questionnaire

(REFERENCES: FTA Circular 4702.1B)

I. GENERAL REPORTING REQUIREMENTS:

A. MOST RECENTLY FILED ANNUAL TITLE VI CERTIFICATIONS AND ASSURANCES

Execution Date of your most recent Certification and Assurances filed with NIRPC (This would be sometime in 2019 for FFY 2020).

The most recent Certifications and Assurances filed with NIRPC were signed March 27th, 2019.

B. COPY OF PROCEDURES FOR FILING A TITLE VI COMPLAINT and a summary for investigating and tracking Title VI complaints.

ECT offers a complaint form on every transit vehicle and on our website: <http://www.eastchicago.com/page10/page90/page92/index.html> You can share your comments, suggestions, and complaints by filling out this form. You can also call our office and a complaint form will be mailed to you. If assistance in filling out a complaint form is required, please contact the office and one of our staff will assist you. Comments, complaints or suggestions may be submitted by mail, on our web site, or by phone.

All service complaints are subject to ECT Complaint Policy. All complaints are investigated and receive responses. We can only resolve problems if we are informed, so please do not hesitate to contact us.

A service complaint is defined as a dispute or dissatisfaction with service. Any passenger or citizen with a complaint has within 10 business days to submit the complaint. Preferably complaints should be in writing with a signature, address and phone number so that we can contact the complainant for additional information and to provide a response. It is possible to submit complaints anonymously but this will limit the ability of ECT to investigate the matter and no response can be provided. Please mail, email, fax or deliver this form to: East Chicago Transit, Attn. Transit Director; 5400 Cline Ave; East

Chicago, IN 46312. Phone-in complaints shall be documented by our management staff and given to the ECT Director. The ECT Director or designee shall review the complaint and within 30 business days of its receipt and notify the complainant if contact information is provided.

If the proposed remedy is not acceptable, the person who filed the complaint may appeal with East Chicago Law Department, 4525 Indianapolis Blvd., East Chicago, IN 46312, 219-391-8291 for purposes of stating their complaint and identifying an appropriate remedy.

East Chicago Law Department will provide further assistance.

If acceptable, the matter is concluded. If not, the person is again advised of the appropriate steps to file the complaint by East Chicago Law Department.

- C. **LIST OF ALL ACTIVE TITLE VI INVESTIGATIONS, LAWSUITS OR COMPLAINTS** naming your organization which allege discrimination on the basis of race, color, or national origin with respect to transit service or other transit benefits. Include: date lawsuit or complaint was filed, summary of the allegation, status of investigation, lawsuit or complaint, and actions taken in response (including whether or not the parties involved have entered into a consent decree).

(The lawsuit/complain/investigation information here should be transit service-related and/or transit benefit-related. If your organization has any contractors that provide some or all of your transportation service, provide investigation/lawsuit/complaint information for those entities also.)

ECT has no pending lawsuits or complaints.

- E. **COPY OF PLAN OR POLICY FOR PROVIDING LANGUAGE ASSISTANCE FOR PERSONS WITH LIMITED ENGLISH PROFICIENCY.**

Describe how information and programs are accessed for those individuals who are Limited English Proficient (LEP). Include the actions taken to ensure the benefits, resources and services are provided to them. If a plan does not exist, provide a policy or description on how this is performed.

Plan may be based on the DOT LEP Guidance or an alternative framework.

Individuals who are Limited English Proficient (LEP) are still able to access our system based on the fact that our literature, information is available in Spanish.

When people call for information, our office also has Spanish-speaking individuals to interpret.

ECT also utilizes Spanish-speaking staff in communicating route information to passengers when they call the office, and when attending community meetings. Transit schedules are printed in both English and Spanish due to the fact that a large percentage of East Chicago Transit's ridership is of Hispanic origin (based on 2010 census). A Title VI statement of rights and complaint handling procedures is posted at the central garage for all employees to see and is available at East Chicago Transit's main office (pg 9 of ECT's Title VI)

F. COPY AND DESCRIPTION OF NOTIFICATION TO THE PUBLIC OF PROTECTION UNDER TITLE VI.

Describe how the agency provides information regarding Title VI obligations (programs operated without regard to race, color, and national origin) to the public. List and describe the media tools used to post and distribute this information. (Media tools can include but not limited to websites, bus postings, brochures, complaint forms.)

ECT uses local newspapers, social media and website, various community organizations, and ECT fleet to disseminate information to the citizens of the City of East Chicago. (pg. 9 of ECT Title VI).

ECT also has a distribution list which shows the locations where any and all information to be posted are located.

(see attached "Literature Distribution List")

II. PROGRAM SPECIFIC REQUIREMENTS FOR GRANTEEES IN URBANIZED ZONE AREAS OF 200,000 OR MORE:

A. COLLECTION OF DEMOGRAPHIC DATA.

FTA Requirement: Submit maps and charts demonstrating the collection and analysis of racial and ethnic data showing the extent to which members of minority groups are beneficiaries of programs receiving Federal financial assistance.

Requirement Summary: Submit the following; demographic and service profile maps and charts, survey information on customer demographic and travel patterns, and/or a locally developed alternative.

(see Exhibits I)

B. **MODIFIED SYSTEMWIDE SERVICE STANDARDS AND POLICIES.**

FTA Requirement: Submit a copy of systemwide service standards and policies. Describe the impact of the service standard or policy changes on the minority community, if any. Changes resulting in an adverse impact upon the minority community must be identified, including the actions the agency has taken or will take to eliminate, minimize or mitigate the adverse impact. If there have been no changes in service standards and policies within this timeframe, please respond accordingly.

Requirement Summary: Submit a complete copy of your systemwide service standards and policies including standards for on-time performance and transit security.

Briefly describe the impact of each change on minority communities in your service area. If any change resulted in adverse impacts on minority communities, describe actions taken (or to be taken) to eliminate, minimize, or mitigate these adverse impacts.

ECT will use the following 5 transit service indicators to monitor Title VI compliance:

- 1. Vehicle Load - is a ratio of the number of seats on a vehicle to the number of passengers. The load factor is an indicator of the extent of probable overcrowding or the need for additional vehicles.**
- 2. Vehicle Assignment - refers to the process by which transit vehicles are assigned to routes throughout ECT service area.**
- 3. Vehicle Headway - is a measurement of the time interval between 2 vehicles traveling in the same direction on the same route. The frequency of service is a general indicator of the level of service provided along a route and a factor in the calculation of the amount of travel time expended by a passenger to reach his/her destination.**
- 4. Distribution of Transit Amenities - refers to items of comfort and convenience available to the general riding public such as signage and shelters**
- 5. Transit Access - is a measure of the distance a person must travel to gain access to ECT. Transit access is a general measure of the distribution routes within ECT service area.**

In compliance with FTA Title VI guidelines, the Director of ECT will be responsible to review the local service standards established above (transit service indicators), for compliance.

Procedures and guidelines to monitor compliance with Title VI and identify possible areas of noncompliance are in place. ECT will review transit

services provided to minority groups on a biennial basis in conjunction with the MPO biennial review process.

C. SYSTEMWIDE SERVICE AND FARE CHANGES

FTA Requirement: Submit an equity evaluation of service changes and fare changes and proposed improvements at the planning and programming stages to determine whether those changes have a discriminatory impact.

Requirement Summary: Assess the effects of the proposed fare or service change on minority and low-income populations or the alternatives available for the people affected. Describe the actions proposed to minimize, mitigate, or offset any adverse effects and determine if any of the proposals would have a disproportionately high adverse effect on minority and low-income riders.

ECT is a free fixed route and complementary paratransit service. In the event that ECT was to implement a fare, or a service reduction, there is a public notification policy in place.

D. TITLE VI INTERNAL MONITORING TRANSIT SERVICE PROCESS NARRATIVE

FTA Requirement: Document any disparities arising out of your monitoring processes relative to levels and quality of service. If any disparities were identified, provide a narrative describing the disparity, and the action(s) you have taken or will take to remedy the situation.

Requirement Summary: Document the utilization of the monitoring portion of your Title VI internal review process in identifying and resolving a disparity by choosing either the level of service, quality of service, or analysis of customer surveys, or locally developed procedure methods. If you conducted no monitoring, make a statement to that effect but note your future intent to do so.

Quality of service surveys are conducted on a yearly basis. The service is reviewed by the Director and if the quality is not met, corrective actions will have to be taken.

OVERVIEW

The Northwestern Indiana Regional Planning Commission (NIRPC) is conducting a Biennial Review of **North Township Dial-A-Ride**. The review determines whether the subrecipient is administering its FTA-funded programs in accordance with 49 U.S.C. Chapter 53, Federal transit law provisions. It assesses management practices and program implementation to ensure that the programs are administered in accordance with FTA requirements and are meeting program objectives. **The periods the biennial review will cover are 2020 and 2021.**

Prior to the on-site portion of the Biennial Review, NIRPC examines information provided by the subrecipient. During the on-site portion of the review, which occurs at the subrecipient's place of business, NIRPC representatives and the subrecipient discuss outstanding issues, examine FTA-funded facilities and equipment, review additional documents, and visit selected contractors.

This subrecipient information request and review package contains a comprehensive list of items that will be needed by NIRPC. It contains two sections of which require your response. **Most of the questions require more than a yes or no answer. Please elaborate when necessary.**

- **Section A – Pre-Site Visit Review Information** contains the subrecipient profile and questions for the 16 areas of the review. **Send responses and all requested documentation to NIRPC no later than July 29, 2022.** Note that it is important that the subrecipient profile and questions be completed in Microsoft (MS) Word format, and not in portable document format (PDF), because NIRPC will enter additional information.
 - **Subrecipient Profile.** This portion contains information that allows NIRPC to gain a current understanding of the subrecipient's operations, ongoing activities, accomplishments, and future projects.
 - **Questions.** Within each review area, provide answers to each question. NIRPC will review each question to determine if additional information is required. Responses will be discussed during the site visit.
- **Section B – Requested Documents.** Provide documents to arrive with Section A information. Electronic versions of the documents are preferred. Please assemble and organize the requested documents preferably in PDF, MS Word, or MS Excel format.

Note: For transmitting your responses, NIRPC requests you upload your documents on a flash drive". Please be prepared to designate a point of contact for your agency, for which user access should be provided.

Site Visit. A site visit will be arranged to discuss areas for clarification and review documents. Time span of the site visit will be determined after the requested information has been received and reviewed. For subrecipients that operate out of multiple FTA-funded facilities or that have contractors or subcontractors, before the site visit, NIRPC will coordinate the selection of the facilities, contractors, and subrecipients to be visited.

- For the site visit, subrecipients should have available representatives who are familiar with the listed topics, as well as the pertinent documentation, so that our time together can be as productive as possible.

SECTION A – PRE-SITE VISIT REVIEW INFORMATION

To Be Submitted to NIRPC by July 29, 2022

SUBRECIPIENT PROFILE

The information below will be used to update the “description of the subrecipient” in the Biennial Review report. Please be thorough.

INSTITUTIONAL STRUCTURE

Type of Organization: Township Government in Lake County Indiana	Year Transit Service Established: 1989	Website Address: www.northtownshiptrustee.com
Jurisdictions Served: Hammond, Highland, East Chicago, Whiting, Munster		Service Area Population: 152,913
List of Contractors (if applicable): <ul style="list-style-type: none"> - Management Contractor: - Demand response Operating Contractor(s): Triple A Express - Paratransit Operating Contractor(s): - Contractors with Safety-Sensitive Employees: Performance Auto, Prompt Ambulance, and InHealth Ambulance 		
Name(s): Triple A Express Performance Auto Prompt Ambulance/InHealth Ambulance	FTA Funding Source(s): 5307	Service(s) Provided: Bus Maintenance
List Lessees:		

SERVICE/ROLLING STOCK DESCRIPTION

Non-Rail Modes	Number of Routes	Number of Vehicles		
		FTA funded	Locally funded	
Bus (directly operated)	Demand Response	7	3 buses owned by North Township	
Bus (purchased transportation)	Contractor: Triple a Express (has mini vans)	0	0	

Non-Rail Modes	Number of Routes	Number of Vehicles	
		FTA funded	Locally funded
Paratransit (directly operated)	N/A	N/A	N/A
Paratransit (purchased transportation)	N/A	N/A	N/A

Span of Service:	Hours (differentiate by mode if applicable)
Weekdays	Monday-Friday 7am-5pm (no Holidays)
Saturdays	N/A
Sundays	N/A

FIXED ASSETS

Facilities	Number	Names/Locations	FTA Interest? (Yes or No)
Bus Garages	0	N/A	N/A
Transit Centers	N/A	N/A	N/A
Other Facilities	2	DAR office located at Wicker Park, Highland, IN Diapatch Center located at InHealth Ambulance Service, Highland, IN	

GRANT ACTIVITY

Provide a brief description of noteworthy projects completed since your last Biennial Review.

Nothing to Report

Provide a brief description of noteworthy projects that are on-going.

Nothing to report

Provide a brief description of noteworthy projects that are planned for the next two to five years.

Nothing to report

Provide a brief description of Section 5307 projects completed or underway.

No projects completed or underway.

ORGANIZATIONAL STRUCTURE

Provide a brief description of the composition of the organization's governing body.

North Township Trustee, and North Township Board,

GOVERNING BOARD CONTACT INFORMATION

The final Biennial Review report will be provided to the CEO (or equivalent). Provide contact information.

Name: Adrian Santos

Title: North Township Trustee

Mailing Address: 5947 Hohman Ave – Hammond, In 46320

Email Address: www.north-township-trustee.com

- **Complaint procedures**

Subrecipient Response:

Any complaints made against Triple A staff or drivers are taken by Dial-a-Ride staff, and turned over to the Director of Transportation. The complaint is then forwarded to the owner of Triple A for investigation. A written resolution response is returned to the Director.

INFORMATION NEEDED FROM SUBRECIPIENT

- ADA complaint procedures.
- ADA complaint record retention procedures.
- Sample driver handbooks.
- Sample driver operating and training manuals.
- Sample vehicle specifications/information on annunciators.
- Sample internal service monitoring materials, such as surveys, checklists, interview forms, etc.
- Sample operating and training manuals.
- ADA complaint form

6. TITLE VI

Basic Requirement: The subrecipient must ensure that no person shall, on the grounds of race, color, or national origin, be excluded from participating in, or be denied the benefits of, or be subject to discrimination under any program or activity receiving Federal financial assistance without regard to whether specific projects or services are federally funded. The subrecipient must ensure that federally supported tr

- 1. Have any oversight reviews, audits, or investigations of the subrecipient conducted since the last Biennial Review (including Title VI Reviews and the most recent Biennial Review) identified significant deficiencies, material weaknesses and/or repeat deficiencies in the area of Title VI?**

Subrecipient Response:

No

Are any such reviews scheduled during this Federal fiscal year (FFY)?

Subrecipient Response:

No

- 2. Did the subrecipient experience difficulty resolving or closing any oversight review, investigation, or audit deficiencies or finding related to Title VI?**

Subrecipient Response:

No

Are any Title VI deficiencies or finding currently open?

Subrecipient Response:

No

- 3. If a Title VI compliance review is scheduled for the current FFY, what information prompted the review?**

Subrecipient Response:

N/A

- 4. Are any issues related to Title VI indicated in the monitoring and oversight?**

Subrecipient Response:

No

- 5. Have Title VI complaints been filed with the subrecipient?**

Subrecipient Response:

No

- 6. Has the subrecipient submitted a Title VI program to NIRPC? If yes, when does the concurrence expire?**

Subrecipient Response:

Yes. It expires in 2020.

If no, is the subrecipient working with the NIRPC staff on its submission? If the program has expired, what is the explanation?

Subrecipient Response:

N/A

Has the subrecipient recently reached a threshold triggering additional requirements in Chapter IV of FTA C. 4702.1B (50 or more fixed-route vehicles in peak service/located in an urbanized area (UZA) of 200,000 or more in population).

Subrecipient Response:

No

If the subrecipient is located in a UZA under 200,000 in population and operates 50 or more fixed-route vehicles in peak demand, does it provide any service into an area of 200,000 or more?

Subrecipient Response:

N/A

- 7. Describe the resources utilized in the implementation of the Title VI program in terms of personnel, responsibility, and experience. Does the subrecipient provide technical training to employees?***

Subrecipient Response:

?

- 8. How does the subrecipient implement the procedures in its Title VI plan for identifying, investigating, and tracking complaints? How do these procedures afford the public due process for resolving complaints?***

Subrecipient Response:

The initial complaint is given to the Director of Transportation within 10 working days, and within 10 working days, the complainant is notified that the complaint is being investigated. Within 60 days, the complainant will be notified of the decision, and if not satisfied can appeal.

- 9. How does the subrecipient notify the public of its rights under Title VI?***

Subrecipient Response:

A copy of the Federal Transportation Administration Civil Rights Assurance is posted on the buses, and also on the township website.

10. What steps has the subrecipient taken to ensure meaningful access to the benefits, services, information, and other important portions of its programs and activities for limited English proficiency (LEP) persons?

Subrecipient Response:

Translators are provided if needed, and a Spanish version of Title VI rights is available.

How did the results of the four-factor analysis influence the steps taken?

Subrecipient Response: **The four factor analysis indicates Dial-a-Ride provides services to minority based communities, as well as a majority of senior citizens and females.**

How does the subrecipient train employees to provide timely and reasonable language assistance, even those that may not be apparent from the four-factor analysis?

Subrecipient Response:

Translators are available when needed, and English/Spanish flyers are accessible in the offices and website.

11. How did the subrecipient ensure inclusive public participation of minority and LEP populations into its public participation procedures, such as soliciting comments on fare increases and service reductions and on its policies and procedures?

Subrecipient Response:

A public hearing may be held by Dial-a-Ride 14 days prior to any change in service to consider views and comments by the public. Legal notices are also published in the newspapers. Notices are also posted on all the buses. Any hearing will be accessible to the disabled, and will also have translators if needed.

12. How does the subrecipient monitor to ensure that contractors comply with Title VI requirements?

Subrecipient Response:

Triple A is required, per the contract with North Township, to follow all federal regulations regarding Title VI. Dial-a-Ride takes all calls regarding reservations, changes or cancellations.

13. Has the subrecipient constructed transit facilities such as storage facilities, maintenance facilities, operations centers, etc., since October 1, 2020, or does it plan to in FFY 2020 -2021?

Subrecipient Response:

N/A

- Was a Title VI equity analysis completed, or when is it anticipated to be completed?**

Subrecipient Response:

N/A

- ***If an analysis has not been or is not anticipated to be completed, what factors led to this conclusion?***

Subrecipient Response:

N/A

- ***If an analysis has been completed, how did the subrecipient conduct the equity analysis and how did the impacts across various sites affect the final decision for location?***

Subrecipient Response:

N/A

INFORMATION NEEDED FROM SUBRECIPIENT

- Most recent Title VI program.
- Listing of Title VI complaints/lawsuits that have occurred since the latest biennial review
- List of transit facilities to be constructed/leased in the upcoming two Federal fiscal years and copy of equity analysis completed or schedule for equity analysis completion
- List of any fare increases or major service changes since the latest biennial review.
- Competitive selection or annual program of projects process



2020 Title VI Questionnaire

(REFERENCES: FTA Circular 4702.1B)

I. GENERAL REPORTING REQUIREMENTS:

A. MOST RECENTLY FILED ANNUAL TITLE VI CERTIFICATIONS AND ASSURANCES

Execution Date of your most recent Certification and Assurances filed with NIRPC (This would be sometime in 2019 for FFY 2020).

Document signed in April 2019. Copy of Signature Page and copy of Certifications and Assurances checklist page are included with this correspondence.

B. COPY OF PROCEDURES FOR FILING A TITLE VI COMPLAINT and a summary for investigating and tracking Title VI complaints.

Title VI Complaint Process included with this correspondence.

C. LIST OF ALL ACTIVE TITLE VI INVESTIGATIONS, LAWSUITS OR COMPLAINTS naming your organization which allege discrimination on the basis of race, color, or national origin with respect to transit service or other transit benefits. Include: date lawsuit or complaint was filed, summary of the allegation, status of investigation, lawsuit or complaint, and actions taken in response (including whether or not the parties involved have entered into a consent decree).

(The lawsuit/complain/investigation information here should be transit service-related and/or transit benefit-related. If your organization has any contractors that provide some or all of your transportation service, provide investigation/lawsuit/complaint information for those entities also.)

North Township Dial-a-Ride does not have any active/ongoing Title VI investigations, lawsuits or complaints; nor have there been any such investigations, lawsuits or complaints filed during the past three years.

E. COPY OF PLAN OR POLICY FOR PROVIDING LANGUAGE ASSISTANCE FOR PERSONS WITH LIMITED ENGLISH PROFICIENCY.

Describe how information and programs are accessed for those individuals who are Limited English Proficient (LEP). Include the actions taken to ensure the benefits,

resources and services are provided to them. If a plan does not exist, provide a policy or description on how this is performed.

Plan may be based on the DOT LEP Guidance or an alternative framework.

Limited English Proficiency (LEP) Policy included with this correspondence.

F. COPY AND DESCRIPTION OF NOTIFICATION TO THE PUBLIC OF PROTECTION UNDER TITLE VI.

Describe how the agency provides information regarding Title VI obligations (programs operated without regard to race, color, and national origin) to the public. List and describe the media tools used to post and distribute this information. (Media tools can include but not limited to websites, bus postings, brochures, complaint forms.)

Federal Transportation Administration (FTA) Civil Rights Assurance is included with this correspondence. Said notification is posted in North Township Offices, on all Dial-A-Ride Vehicles and on the North Township website.

II. PROGRAM SPECIFIC REQUIREMENTS FOR GRANTEES IN URBANIZED ZONE AREAS OF 200,000 OR MORE:

A. COLLECTION OF DEMOGRAPHIC DATA.

FTA Requirement: Submit maps and charts demonstrating the collection and analysis of racial and ethnic data showing the extent to which members of minority groups are beneficiaries of programs receiving Federal financial assistance.

Requirement Summary: Submit the following; demographic and service profile maps and charts, survey information on customer demographic and travel patterns, and/or a locally developed alternative.

North Township Trustee Dial-A-Ride is a FREE, Demand Response Public Transportation service for the residents of North Township to destination within North Township. North Township consists of the following five communities; Whiting, East Chicago, Hammond, Highland and Munster.

- **Total Rides for 2018: 40,079**
- **Riders from Minority Based Communities: 72%**
- **Riders from Non-Minority Based Communities: 28%**
- **Female Riders: 62%**
- **Male Riders: 48%**
- **Riders 50 Years of Age or Older: 54%**
- **Riders 49 Years of Age or Younger: 46%**
- **Riders who were Children: Less than 1%**
- **ADA Related Trips: 8017 Trips = 20%**

B. MODIFIED SYSTEM WIDE SERVICE STANDARDS AND POLICIES.

FTA Requirement: Submit a copy of system wide service standards and policies. Describe the impact of the service standard or policy changes on the minority community, if any. Changes resulting in an adverse impact upon the minority community must be identified, including the actions the agency has taken or will take to eliminate, minimize or mitigate the adverse impact. If there have been no changes in service standards and policies within this timeframe, please respond accordingly.

Requirement Summary: Submit a complete copy of your system wide service standards and policies including standards for on-time performance and transit security.

Briefly describe the impact of each change on minority communities in your service area. If any change resulted in adverse impacts on minority communities, describe actions taken (or to be taken) to eliminate, minimize, or mitigate these adverse impacts.

The North Township Dial-A-Ride Informational Flyer is included with this correspondence.

Also included is the North Township Dial-A-Ride Cancellation/No Show Policy which includes Rider Responsibility Information.

Several years ago, Dial-A-Ride expanded its service hours to 7 am to 5 pm on weekdays, excluding holidays. This change enabled Dial-A-Ride to provide more service to more people (including minorities) and to take them to a greater number of places / appointments at times that are more conducive to their schedules.

There have been no changes in service standards and policies for North Township Dial-a-Ride since the last Title VI submission in 2017.

C. SYSTEM WIDE SERVICE AND FARE CHANGES

FTA Requirement: Submit an equity evaluation of service changes and fare changes and proposed improvements at the planning and programming stages to determine whether those changes have a discriminatory impact.

Requirement Summary: Assess the effects of the proposed fare or service change on minority and low-income populations or the alternatives available for the people affected. Describe the actions proposed to minimize, mitigate, or offset any adverse effects and determine if any of the proposals would have a disproportionately high adverse effect on minority and low-income riders.

North Township Dial-A-Ride is a FREE Demand-Response Transportation Service. There are no plans for any fare or service changes. In the event it should become necessary to institute fare or service change, North Township has a Public Notification and Comment Policy in place. A copy of said policy is included with this correspondence.

D. **TITLE VI INTERNAL MONITORING TRANSIT SERVICE PROCESS NARRATIVE**

FTA Requirement: Document any disparities arising out of your monitoring processes relative to levels and quality of service. If any disparities were identified, provide a narrative describing the disparity, and the action(s) you have taken or will take to remedy the situation.

Requirement Summary: Document the utilization of the monitoring portion of your Title VI internal review process in identifying and resolving a disparity by choosing either the level of service, quality of service, or analysis of customer surveys, or locally developed procedure methods. If you conducted no monitoring, make a statement to that effect but note your future intent to do so.

There were no disparities.

Opportunity Enterprises, Inc.
UNIVERSAL POLICIES AND PROCEDURES
HUMAN RESOURCES
POLICY#: 2102—EQUAL EMPLOYMENT OPPORTUNITY
And AMERICAN WITH DISABILITIES ACT

POLICY

Opportunity Enterprises, Inc. (OE) will provide equal employment opportunity and services for all persons in order to:

- prohibit discrimination in employment/services because of race, color, religion, creed, gender identity, marital status, political affiliation, sex, age, disability, veteran status, sexual orientation, national origin
- seek qualified personnel for all job levels from minority group members

This policy applies to all aspects of the employment relationship including employment, compensation, and assignment of work or promotions.

PROCEDURE

1. Members of management are responsible within their area of responsibility for conducting activities in a manner that will ensure compliance with this policy. Furthermore, each supervisor understands that their work performance in the area of equal employment/affirmative action is being evaluated.
2. Applicants for employment are considered and placed without regard to race, sex, color, religion, national origin, disability, or age. OE displays equal employment opportunity notices in conspicuous places.
3. Employment application forms are in compliance with applicable federal and state laws, OE's commitment to equal employment opportunity.
4. The Chief Human Resources Officer (CHRO) or designee will insure that the applicant pool from which the selection (hiring) was made had been established without regard to race, sex, color, national origin, disability, age, or religion.
5. The CHRO or designee will ensure that all personnel actions relating to terms, conditions, and privileges are administered in a nondiscriminatory manner.
6. OE shall not discriminate against a qualified individual with a disability. OE is committed to full compliance with applicable provisions of the 1991 Americans with Disabilities Act and subsequent regulations.
7. Complaints will be taken and reviewed by the CHRO. If necessary, the Administrative team and the agency's attorney will review complaints. Appeals will be reviewed by the President/Chief Executive Officer and the Board of Directors.

Opportunity Enterprises, Inc.
UNIVERSAL POLICIES AND PROCEDURES
HUMAN RESOURCES
POLICY#: 2102—EQUAL EMPLOYMENT OPPORTUNITY
And AMERICAN WITH DISABILITIES ACT

Signatures of Approval:

CARF Controller:	<u><i>Julie McKean</i></u>	Date:	<u><i>6/29/16</i></u>
Chief Human Resources Officer:	<u><i>Hal Jackson</i></u>	Date:	<u><i>6/24/16</i></u>
Chief Financial Officer:	<u><i>Walter Foy</i></u>	Date:	<u><i>6/24/16</i></u>
Chief Program Officer:	<u><i>Colin Smith</i></u>	Date:	<u><i>6-23-16</i></u>
Chief Operating Officer:	<u><i>[Signature]</i></u>	Date:	<u><i>06-23-16</i></u>
President/CEO:	<u><i>Gene Allmarain</i></u>	Date:	<u><i>6-25-16</i></u>

Opportunity Enterprises has not had any Title VI complaints or lawsuits since the last review.

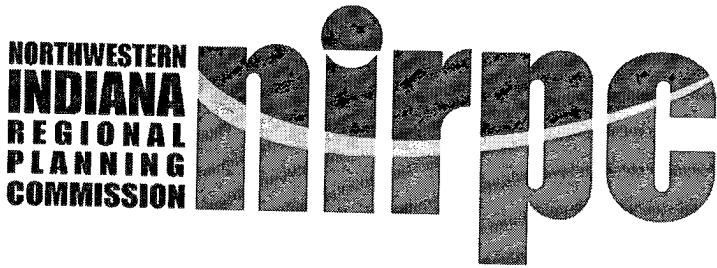
Opportunity Enterprises is not constructing/leasing any transit facilities in the upcoming two Federal fiscal years.

Opportunity Enterprises has not increased the fare since the last review.

This notice is posted in all FTA funded vehicles used by opportunity Enterprises.

Title VI of the American Civil Liberties Act of 1964 States:

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.



2020 Title VI Questionnaire

(REFERENCES: FTA Circular 4702.1B)

I. GENERAL REPORTING REQUIREMENTS:

A. MOST RECENTLY FILED ANNUAL TITLE VI CERTIFICATIONS AND ASSURANCES

Opportunity Enterprises Certifications and Assurances FY19 were sent to NIRPC on 3/15/2019

B. COPY OF PROCEDURES FOR FILING A TITLE VI COMPLAINT and a summary for investigating and tracking Title VI complaints.

The process for filling any complaint is described on the Transportation Complaint Form, placed on all revenue vehicles. A copy is attached

C. LIST OF ALL ACTIVE TITLE VI INVESTIGATIONS, LAWSUITS OR COMPLAINTS naming your organization which allege discrimination on the basis of race, color, or national origin with respect to transit service or other transit benefits. Include: date lawsuit or complaint was filed, summary of the allegation, status of investigation, lawsuit or complaint, and actions taken in response (including whether or not the parties involved have entered into a consent decree).

Opportunity Enterprises has had no Title VI investigations, lawsuits or complaints since the last Triennial Review.

D. COPY OF PLAN OR POLICY FOR PROVIDING LANGUAGE ASSISTANCE FOR PERSONS WITH LIMITED ENGLISH PROFICIENCY.

FTA Requirement: Submit a copy of system wide service standards and policies. Describe the impact of the service standard or policy changes on the minority community, if any. Changes resulting in an adverse impact upon the minority community must be identified, including the actions the agency has taken or will take to eliminate, minimize or mitigate the adverse impact. If there have been no changes in service standards and policies within this timeframe, please respond accordingly.

There have been no changes in service standards or policies that have resulted in an adverse impact upon the minority community.

There have been no changes in service in the last year.

C. SYSTEMWIDE SERVICE AND FARE CHANGES

FTA Requirement: Submit an equity evaluation of service changes and fare changes and proposed improvements at the planning and programming stages to determine whether those changes have a discriminatory impact.

Opportunity Enterprises had has no service or fare increases since the last Triennial review

D. TITLE VI INTERNAL MONITORING TRANSIT SERVICE PROCESS NARRATIVE

FTA Requirement: Document any disparities arising out of your monitoring processes relative to levels and quality of service. If any disparities were identified, provide a narrative describing the disparity, and the action(s) you have taken or will take to remedy the situation.

No disparities have arisen relating to our quality of service. There have been no changes to the Title VI monitoring process within the past three years.

Porter County Aging and Community Services, Inc.

Biennial Review 2021

6. Title VI

INFORMATION NEEDED FROM SUBRECIPIENT

- Most recent Title VI program. **Most recent Title VI program. PCACS submitted a title VI program in 2017 for the 2017 Title VI recertification for FTA. This recertification is done every three years.**
- Listing of Title VI complaints/lawsuits that have occurred since the latest biennial review **NONE.**
- List of transit facilities to be constructed/leased in the upcoming three Federal fiscal years and copy of equity analysis completed or schedule for equity analysis completion **NO fare increases or major service changes since last biennial review.**
- List of any fare increases or major service changes since the latest biennial review. **NO fare increases or major service changes since last biennial review.**
- Competitive selection or annual program of projects process **None to report**

BIENNIAL REVIEW DOCUMENTATION LIST	Yes	No	N/A
6. Title VI			
INFORMATION NEEDED FROM SUBRECIPIENT			
Most recent Title VI program.	X		
Listing of Title VI complaints/lawsuits that have occurred since the latest biennial review			N/A
List of transit facilities to be constructed/leased in the upcoming three Federal fiscal years and copy of equity analysis completed or schedule for equity analysis completion			N/A
List of any fare increases or major service changes since the latest biennial review.			N/A
Competitive selection or annual program of projects process			

2020 Title VI Questionnaire

(REFERENCES: FTA Circular 4702.1B)

I. GENERAL REPORTING REQUIREMENTS:

A. MOST RECENTLY FILED ANNUAL TITLE VI CERTIFICATIONS AND ASSURANCES

*Execution Date of your most recent Certification and Assurances filed with NIRPC
(This would be sometime in 2019 for FFY 2020).*

Answer: March 15, 2019

B. COPY OF PROCEDURES FOR FILING A TITLE VI COMPLAINT and a summary for investigating and tracking Title VI complaints.

Answer: Complaint form is attached along with the process.

C. LIST OF ALL ACTIVE TITLE VI INVESTIGATIONS, LAWSUITS OR COMPLAINTS naming your organization which allege discrimination on the basis of race, color, or national origin with respect to transit service or other transit benefits. Include: date lawsuit or complaint was filed, summary of the allegation, status of investigation, lawsuit or complaint, and actions taken in response (including whether or not the parties involved have entered into a consent decree).

Answer: We have none at this time

(The lawsuit/complain/investigation information here should be transit service-related and/or transit benefit-related. If your organization has any contractors that provide some or all of your transportation service, provide investigation/lawsuit/complaint information for those entities also.)

E. COPY OF PLAN OR POLICY FOR PROVIDING LANGUAGE ASSISTANCE FOR PERSONS WITH LIMITED ENGLISH PROFICIENCY.

Describe how information and programs are accessed for those individuals who are Limited English Proficient (LEP). Include the actions taken to ensure the benefits, resources and services are provided to them. If a plan does not exist, provide a policy or description on how this is performed.

Answer: See attached brochure—help is provided upon request

Plan may be based on the DOT LEP Guidance or an alternative framework.

F. COPY AND DESCRIPTION OF NOTIFICATION TO THE PUBLIC OF PROTECTION UNDER TITLE VI.

Describe how the agency provides information regarding Title VI obligations (programs operated without regard to race, color, and national origin) to the public. List and describe the media tools used to post and distribute this information. (Media tools can include but not limited to websites, bus postings, brochures, complaint forms.)

Answer: Procedure for receiving assistance is provided on our website, buses, brochures, and on all forms

II. PROGRAM SPECIFIC REQUIREMENTS FOR GRANTEEES IN URBANIZED ZONE AREAS OF 200,000 OR MORE:

A. COLLECTION OF DEMOGRAPHIC DATA.

FTA Requirement: Submit maps and charts demonstrating the collection and analysis of racial and ethnic data showing the extent to which members of minority groups are beneficiaries of programs receiving Federal financial assistance.

Requirement Summary: Submit the following; demographic and service profile maps and charts, survey information on customer demographic and travel patterns, and/or a locally developed alternative.

Answer: Our service area is Porter County which has a population of about 165,000 people. Our service is for seniors and those with disabilities. No one pays more than a dollar for a ride so everyone receives financial assistance. Attached is a copy of our client demographics for a five day period.

B. MODIFIED SYSTEMWIDE SERVICE STANDARDS AND POLICIES.

FTA Requirement: Submit a copy of system wide service standards and policies. Describe the impact of the service standard or policy changes on the minority community, if any. Changes resulting in an adverse impact upon the minority community must be identified, including the actions the agency has taken or will take to eliminate, minimize or mitigate the adverse impact. If there have been no changes in service standards and policies within this timeframe, please respond accordingly.

Answer: We don't have any minority communities. We have had no changes to our service standards or policies other than giving more attention to riders with disabilities, seniors with wheelchairs, and those without a means of transportation.

Requirement Summary: Submit a complete copy of your systemwide service standards and policies including standards for on-time performance and transit security.

Briefly describe the impact of each change on minority communities in your service area. If any change resulted in adverse impacts on minority communities, describe actions taken (or to be taken) to eliminate, minimize, or mitigate these adverse impacts.

C. SYSTEMWIDE SERVICE AND FARE CHANGES

FTA Requirement: Submit an equity evaluation of service changes and fare changes and proposed improvements at the planning and programming stages to determine whether those changes have a discriminatory impact.

Requirement Summary: Assess the effects of the proposed fare or service change on minority and low-income populations or the alternatives available for the people affected. Describe the actions proposed to minimize, mitigate, or offset any adverse effects and determine if any of the proposals would have a disproportionately high adverse effect on minority and low-income riders.

Answer: Clients with disabilities and seniors unable to pay ride for free.

D. TITLE VI INTERNAL MONITORING TRANSIT SERVICE PROCESS NARRATIVE

FTA Requirement: Document any disparities arising out of your monitoring processes relative to levels and quality of service. If any disparities were identified, provide a narrative describing the disparity, and the action(s) you have taken or will take to remedy the situation.

Requirement Summary: Document the utilization of the monitoring portion of your Title VI internal review process in identifying and resolving a disparity by choosing either the level of service, quality of service, or analysis of customer surveys, or locally developed procedure methods. If you conducted no monitoring, make a statement to that effect but note your future intent to do so.

Answer: No disparities are seen as we continue to give all our rides to seniors and people with disabilities.



TITLE VI PROGRAM

Approved by Board of Directors:



Rick Niemeyer, President

3-18-20
Date

Submitted as part of NIRPC's TITLE VI Program

Submitted to NIRPC January 2020

AGENCY PROFILE

Lake County Community Services, Inc.
1450 E. Joliet Street; Suite 202
Crown Point, IN 46307
(219) 663-0627 phone
(219) 663-0629 fax
bmabon@slccs.com
Executive Director- Blossom B. Mabon, MBA

SERVICE AREA

The townships of Ross, Center, Winfield, Hanover, St. John, Cedar Creek, West Creek and Eagle Creek. (as of January 15, 2014)

SERVICE AREA POPULATION

Approximately 160,000 (2010 census)

ENTITY DESCRIPTION

South Lake County Community Services, Inc. (SLCCS) dba Lake County Community Services (LCCS) (since 10/2018) is a not-for-profit corporation formed under the State of Indiana corporation law. A significant portion of its service area is located within the Chicago, IL-IN urbanized area.

TRANSPORTATION SERVICE DESCRIPTION

LCCS provides demand-response public transportation to the general public, including seniors and people with disabilities. The service is available on weekdays from approximately 8:30 am to 3:30 pm. The service does not operate on major federal holidays and weekends. LCCS also operates a subscription trip program for a local sheltered workshop that utilizes New Freedoms funding.

Over the past three years, LCCS has provided an average of 48,000 one-way trips. The fleet consists of 15 BOC buses equipped with wheelchair lifts in daily use, and two buses for maintenance swap. All of LCCS drivers and transportation staff hold valid commercial driver's licenses with passenger endorsements.

FTA ASSISTANCE

LCCS is a sub-recipient of FTA Section 5307 funding through Northwestern Indiana Regional Planning Commission.

TITLE VI QUESTIONNAIRE: LAKE COUNTY COMMUNITY SERVICES, INC.

I. GENERAL REPORTING REQUIREMENTS:

A. MOST RECENTLY FILED ANNUAL TITLE VI CERTIFICATIONS AND ASSURANCES

March 2019

B. COPY OF PROCEDURES FOR FILING A TITLE VI COMPLAINT

Please see the attached Transportation Policy for detailed grievance policy and complaints process.

C. LIST OF ALL ACTIVE TITLE VI INVESTIGATIONS, LAWSUITS OR COMPLAINTS naming your organization which allege discrimination on the basis of race, color, or national origin with respect to transit service or other transit benefits. Include: date lawsuit or complaint was filed, summary of the allegation, status of investigation, lawsuit or complaint, and actions taken in response (including whether or not the parties involved have entered into a consent decree).

None

D. COPY OF PLAN OR POLICY FOR PROVIDING LANGUAGE ASSISTANCE FOR PERSONS WITH LIMITED ENGLISH PROFICIENCY.

Describe how information and programs are accessed for those individuals who are Limited English Proficient (LEP). Include the actions taken to ensure the benefits, resources and services are provided to them. If a plan does not exist, provide a policy or description on how this is performed. (Plan may be based on the DOT LEP Guidance or an alternative framework.)

Based on census data and actual ridership demographics, the number of clients who would be considered LEP is so low that it does not warrant the cost of creating special materials at this time. If a client were to state that he/she has difficulty using any materials that the Agency provides, it is standard policy to offer accommodations, such as large print materials or reading the materials to him/her.

E. COPY AND DESCRIPTION OF NOTIFICATION TO THE PUBLIC OF PROTECTION UNDER TITLE VI.

Copies of the public notice policy and the transportation policy are enclosed. The transportation policy is also available on all buses, at the administration office, on our website and through the mail upon request. All new clients receive this policy when they first start the service.

Local newspapers used for public notices: The Times and Post-Tribune
LCCS has a newly designed website as of 03/2019: <http://www.lccs.care/>

II. PROGRAM SPECIFIC REQUIREMENTS FOR GRANTEES IN URBANIZED ZONE AREAS OF 200,000 OR MORE:

A. COLLECTION OF DEMOGRAPHIC DATA.

FTA Requirement: Submit maps and charts demonstrating the collection and analysis of racial and ethnic data showing the extent to which members of minority groups are beneficiaries of programs receiving Federal financial assistance.

Unduplicated Ridership: 2,426 clients listed on dispatch system data base.

Male-	34%
Female-	66%
Non-minority-	92%
Minority-	8%
Non-disabled-	25%
Disabled-	75%
Non-elderly-	46%
Elderly-	54%
(Elderly - 60 and older)	

Each year, the Agency completes a survey that monitors the quantity and quality of services to clients living in census tracts that have been designated as minority and/or low income as opposed to census tracts that are non-minority and/or low income. NIRPC staff designated these tracts as such based-on census data. Completed surveys for 2016 - 2018 have also been included.

B. MODIFIED SYSTEMWIDE SERVICE STANDARDS AND POLICIES.

FTA Requirement: Submit a copy of systemwide service standards and policies. Describe the impact of the service standard or policy changes on the minority community, if any. Changes resulting in an adverse impact upon the minority community must be identified, including the actions the agency has taken or will take to eliminate, minimize or mitigate the adverse impact. If there have been no changes in service standards and policies within this timeframe, please respond accordingly.

The transportation policy is enclosed. In 2018, there was one minimal service fare increase. There is no major service reduction planned for 2020 nor has there been a reduction over the past three years. Due to loss of funding, LCCS will had to impose a small fee structure for Hobart residents whose ridership was subsidized by

endowment funds from a local foundation. The fare increase will definitely affect all clients in those areas, including low income and minority.

C. SYSTEM WIDE SERVICE AND FARE CHANGES

FTA Requirement: Submit an equity evaluation of service changes and fare changes and proposed improvements at the planning and programming stages to determine whether those changes have a discriminatory impact.

In the past three years there has been no service reductions or fare increases that would be considered as having an adverse effect on minority communities. November 1, 2018 LCCS imposed a minimal fee structure for the residents of Hobart. This fare implication will most definitely affect all clients in those areas, including low income and minority.

D. TITLE VI INTERNAL MONITORING TRANSIT SERVICE PROCESS NARRATIVE

FTA Requirement: Document any disparities arising out of your monitoring processes relative to levels and quality of service. If any disparities were identified, provide a narrative describing the disparity, and the action(s) you have taken or will take to remedy the situation.

The Agency has completed Title VI surveys for the past three years. The results of all surveys have indicated that there is no significant difference in either the quality or quantity of service provided to minority and/or low-income communities as opposed to non- minority and/or low-income communities.



1450 East Joliet Street Suite 202 Crown Point, IN 46307

Phone - (219) 663-3869 Fax - (219) 663-4531 Email slccs@slccs.com

TRANSPORTATION POLICY

▶ Geographical Area Served

Service is available for residents living in the following townships, traveling back and forth from destinations in Lake or Porter Counties: West Creek, Cedar Creek, Eagle Creek, Hanover, Winfield, Center, Ross, Hobart, and St. John Township, and residents living in the Town of Griffith. Coordinated services with other public transportation providers may be available with prior request.

▶ Customer Service

Lake County Community Services welcomes compliments, complaints, and suggestions. We are committed to using our customer input as a tool to improve service quality. All comments may be submitted by mail, fax, phone or e-mail.

▶ Fares

Below is the rate schedule for LCCS. Rates are for one person and for a one-way trip. Fares will be collected by the drivers on a daily basis unless other arrangements are made. Please call LCCS for more information. Rates are subject to change.

Residents of the City of Crown Point

\$3.00 for Seniors 55 years and older, people with disabilities, and children between 5 and 11

\$5.00 for All Others

Residents of the City of Hobart Age 55 and Older:

\$2.00 (sponsored in part by the Maria Reiner Fund through Legacy Foundation)

For All Others

\$5.00 for Seniors 55 years and older, people with disabilities, and children between 5 and 11

\$7.00 for All Others

► Non-Discrimination Policy (Title VI of the Civil Rights Act of 1964)

1. Any person who is, or seeks to be, a patron, of any vehicle, which is operated as a part of, or in conjunction with, this transportation program, shall be given the same access, seating, and other treatment with regard to the use of such vehicle as other persons without regard to their race, color or national origin.
2. No person who is, or seeks to be an employee of this transportation program or lessees, concessionaires, contractors, licensees, or any organization furnishing public transportation service as a part of, or in conjunction with, this program shall be treated less favorably than any other employee or applicant with regard to hiring, dismissal, advancement, wages, or any other conditions and benefits of employment, on the basis of race, color or national origin.
3. No person or group of persons shall be discriminated against with regard to the routing, scheduling, or quality of transportation service furnished by this program on the basis of race, color, or national origin. Frequency of service, age and quality of vehicles assigned to routes, and location of routes may not be determined on the basis of race, color, or national origin.

► Reasonable Accommodations

LCCS will honor all requests for reasonable accommodations from qualified people with disabilities, such as requests for written materials in alternate formats. Please make such requests to the Executive Director. Requests can be submitted either in writing, via e-mail or over the phone.

► **Miscellaneous**

- Reservations for trips must be made at least 48 hours (2 business days) in advance. Transportation is a shared ride service. Reservations are on a first come-first served basis and are subject to vehicle availability. Reservations can be made no further than two weeks in advance.
- Service is curb to curb. Driver is not considered a medical attendant and must remain in line of sight of vehicle at all times. All passengers must be capable of independent travel.
- If the passenger travels with a personal care assistant, there will be no charge for the PCA.
- Clients who use mobility devices, such as wheelchairs or scooters, are required to be properly and safely secured in the device at all times. It is not the responsibility of the driver to secure the passenger into the mobility device before boarding the vehicle.
- All passengers are required to properly use seat belts, and passengers in mobility devices are required to be secured while in transport. Service may be refused to those passengers who refuse to be properly secured while on the bus.
- Wheelchair lifts shall be deployed upon the request of any passenger.
- Service will not be denied on the basis that the mobility device cannot be secured on the bus because of a bus mechanical problem.
- All service animals are welcome on the buses; but must be under control of the owner at all times.
- Passengers may bring and use respirators and portable oxygen equipment on board if required. The tank size shall be limited to 1 day of use.
- Children 7 years old and under must be accompanied by an adult. Children 4 and younger must ride in a car seat provided by the adult. The adult is solely responsible for properly securing the child and the car seat to the bus seat. There is no charge for children 4 years old and younger.

- Unless it is an emergency situation, a client must cancel a reserved ride at least 24 hours in advance or it will be considered a no-show.
- If a client does not cancel 24 hours in advance, full fare will be charged.
- If a trip is scheduled, and then the client is a no-show, full fare will be charged.
- If a client is a no-show twice within a running 3-month period, the Agency reserves the right to refuse service for the next 30 days after written notification to the client.
- No-shows or late cancellations that are for reasons beyond the control of the client are not counted.
- Agency reserves the right to suspend service for failure to pay fares. Passengers will be notified of the suspension after three times of no-pay.
- If the passenger does not agree with Agency's decisions about service, he is encouraged to submit the complaint form.
- Transportation is normally available Monday through Friday. The first scheduled pick-up is 8:30 a.m. and last pick-up is 3:30 p.m.
- Additional hours and days of service may be available upon prior request.
- Billing for transportation is available upon request. Invoices will be prepared and mailed out by the 15th of every month for preceding month. There is an additional \$3.00 fee for billing.
- In case of inclement weather, please listen to Radio 105.5 for information about possible trip cancellations.

All persons will be given equal opportunity and access to file a formal grievance of alleged discrimination under Title VI. These grievances may be submitted to the Grievance Committee of LCCS, or the Northwest Indiana Regional Planning Commission, 6100 Southport Rd., Portage, IN 46368. Please use the enclosed grievance policy and procedure for submission.

► **Grievance Policy and Procedure/Service Complaints**

If you experience a problem with our transportation program, you may wish to file a written service complaint. Complaint policy, procedures and forms are available on all buses, or may be requested by phoning the main office.

Complaint policy, procedure and forms are available in alternate formats, or by e-mail at slccs@slccs.com.

1. It is the right and responsibility of every client of Lake County Community Services, Inc. to express dissatisfaction about services.
2. If a client expresses a desire to lodge a complaint about the Agency, he shall be offered a complaint form.
3. Complaint forms shall be made available on all vehicles, at all Senior Centers, and the administrative offices. Forms shall be mailed upon request.
4. Assistance in completing the form shall be provided by staff if requested by a client.
5. A Grievance Committee shall be established and shall consist of one Board member appointed by the Board President, and one staff member assigned by the Executive Director.
6. The completed Complaint form shall be reviewed by the Grievance Committee within five (5) business days of receipt.
7. The Grievance Committee shall investigate the complaint, and then submit a written report to the Executive Director and the Board President. The report shall include recommended actions to be taken.
8. The written report, attached to a copy of the original complaint, shall be sent by mail to the client.
9. If a client is dissatisfied with the recommendations of the Grievance Committee, a client may submit a written request for appeal to the Board of Directors.
10. The request for appeal shall be placed on the agenda of the next Board meeting. The client will be invited to attend the meeting.
11. The Board of Directors shall respond in writing within 10 business days of the Board meeting.
12. If the person declines to give his name and/or file a written complaint, LCCS staff will complete an incident tracking form and submit it to the Executive Director for review.

LCCS Complaint Form

For assistance in resolving a problem, please complete the following form and submit it to:

Grievance Committee, LCCS, 1450 E. Joliet Street, Crown Point, IN 46307

The staff of LCCS will be happy to assist you in completing this form if necessary.

Alternate formats of this form are available upon request.

Please submit your form within 60 days of the problem occurring.

Name of Person Filing Complaint: _____

Address: _____

Phone: _____ Date: _____

Specifics of Complaint-----

Date Occurred: _____ Time of Day: _____

Employee Name (if applicable): _____

Vehicle # (if applicable): _____ Location: _____

Customer Name (if different from above): _____

Nature of Complaint (use additional sheets if necessary): _____

Signature of Person Completing Form

Lake County Community Services, Inc.

Transportation

Title VI Annual Review, Year 2019

Quality of Service Monitoring- Year 2016

Date of monitoring: February 2017

Total number of surveys sent: 20

Number sent to minority tracts: 10

Number sent to non-minority tracts: 10

Response- Minority: 45%

Non-minority: 15%

	Minority	Non-minority
<i>Average time to destination</i>	<i>15-25 min</i>	<i>10-35 min</i>
Total cost	\$1.00 – 6.00 each way	\$2.25-5.25 each way
Three most traveled destinations	Dialysis	Therapies
	Medical	Medical
	Therapies	Pharmacies
Was service prompt?	80%	75%
Number of turndowns in surveys	10	31
Reason given	No bus available	No bus available

Lake County Community Services, Inc.

Quality of Service Monitoring- Year 2017

Date of monitoring: February 2018

Total number of surveys sent: 20

Number sent to minority tracts: 10

Number sent to non-minority tracts: 10

Response- Minority: 45%

Non-minority: 15%

	Minority	Non-minority
Average time to destination	5-20 min	10-35 min
Total cost	\$0 - \$7 each way	\$0- \$7.00 each way
Three most traveled destinations	Dialysis	Therapies
	Medical	Medical
	Work	Pharmacies
Was service prompt?	85%	75%
Number of turndowns in surveys	9	15
Reason given	No bus available	No bus available

Lake County Community Services, Inc.

Quality of Service Monitoring- Year 2018

Date of monitoring: February 2019

Total number of surveys sent: 20

Number sent to minority tracts: 10

Number sent to non-minority tracts: 10

Response- Minority: 40%

Non-minority: 20%

	Minority	Non-minority
Average time to destination	5-20 min	10-35 min
Total cost	\$1.00-\$6.00 each way	\$1.00- \$6.00 each way
Three most traveled destinations	Dialysis	Therapies
	Medical	Medical
	Therapies	Work
Was service prompt?	80%	70%
Number of turndowns in surveys	17	23
Reason given	No bus available	No bus available

Lake County Community Services - Transportation Survey

Every year, we invite our clients to tell us how we are doing.

We would appreciate it if you would take a few minutes to answer the following questions.

How many times during the past year did you use our transportation services?

Were you ever turned down? _____ How many times during the year? _____

What was the reason? _____

Was the bus prompt? _____

Was the staff (drivers and dispatchers) courteous and helpful? _____

If no, please explain _____

Where did you usually go with the bus? _____

How long was your ride, on average? _____

How much did you usually pay? _____

If you have other comments or suggestions about our services, please list here.

If you would like one of our staff to contact you about your comments, please give us your name and phone number:

Thank you again for your time. Please return the completed survey in the enclosed stamped envelope

Lake County Community Services, Inc.

**PUBLIC NOTIFICATION OF AND COMMENT ON
PROPOSED TRANSIT SERVICE CHANGES POLICY**

Purpose

Recipients of funds from Federal transportation Administration (FTA) are to provide an opportunity for public comment prior to the implementation of significant service changes or fare increases. Lake County Community Services, Inc. (Agency) has developed this policy which is to be followed as a service change or fare increase are contemplated and before implementation. The purposes of this policy are a) to provide an avenue for the public to comment on purposed service changes, and b) to provide an opportunity for the operator to consider the views and comments by the public prior to the implementation of the change.

Definition

This policy affects any temporary or permanent fare increase and/or major services reduction. Major is defined as a loss of service of at least 25%. It is used in the event of the proposed establishment of a fare or an increase in fares. It is used when a service reduction is proposed. This includes a reduction in service span, days of the week, or of frequency of service.

Adequate Public Notice of the Service Change

- a. The public shall be notified by the Agency of the proposed service change by the posting of a notice of the same at the administrative office, all other corporate locations and on all vehicles for a period of thirty (30) calendar days prior to the effective date of the change.
- b. The Agency shall deliver to Northwest Indiana Regional Planning Council (MPO) a copy of the notice at least (30) days prior to the effective date of the change.
- c. A legal notice, issued by the Agency, announcing the public hearing shall be published in the two (2) largest newspapers of general circulation in the Agency's service area. Publication shall be between twenty-one (21) to thirty (30) calendar days of the effective date of the service change.
- d. The Agency shall forward copies of the notice to local agencies and community organizations, including those dealing with seniors and people with disabilities issues.
- e. The notice shall contain information describing the proposed changes, the service area affected, and the effective date of the change.
- f. The notification shall also contain information about the public hearing(s), including location, date and time. Included in the notice shall be the offer to employ a sign language interpreter upon request.

- g. The notice shall state that written views and comments shall be accepted at the administrative office of the Agency prior to the public hearing. The address, telephone, e-mail address, and name of contact person of the agency and the MPO shall be included in the notice.
- h. The notice shall include that the notice is available in alternate formats upon request.
- i. The Agency shall adhere to any other applicable federal and state laws and regulations concerning notification.

Public Hearing

- a. A public hearing(s) shall be held at a convenient time and place for the public. More than one such hearing may be necessary because of travel distance or time or day. An evening or weekend hearing shall be considered in order to increase accessibility.
- b. The hearing shall be held in a location that is accessible to the disabled.
- c. In order for the Agency to consider views and comments made by the public, the public hearing is to take place at least fourteen (14) days prior to the effective date of the service change. This shall allow for possible reconsideration of the proposed change.
- d. A sign language interpreter shall be used upon request.
- e. A court reporter shall provide a written transcript of the hearing proceedings and shall deliver a transcript of the proceedings, including all written comments, to the Agency and the MPO at least seven (7) days prior to the effective date of the service change.
- f. The transcript and all written comments shall be presented to the Agency's Board of Directors at the next Board meeting.
- g. The transcript and all written comments shall be available for review at the Agency's administrative office.
- h. All documents associated with the notice, public hearing(s) and transcripts shall be available in alternate formats upon request.
- i. All costs of the public hearing(s), including legal notices, court reporter, signer, etc. are the responsibility of the Agency.

Sample Timeline

Days prior to Service Change	Action
30	Agency posts Notice of proposed service change Agency provides written notice to MPO Agency posts Notice of Public Hearing(s)
21	Agency publishes legal notice of Public Hearing(s)
14	Public Hearing(s)
7	Transcript of hearing delivered to MPO and Agency
0	Service change implemented



POLICY #:	
CITYWIDE:	
DEPARTMENTAL:	X

ADMINISTRATIVE POLICY & STANDARD PROCEDURE

SECTION: **TRANSPORTE**
 PROCEDURE: COMPLAINTS AND APPEALS
 PREPARED BY: Human Resources
 APPROVED BY: Board of Public Works

ORIGINAL DATE: 4/24/08
 REVISION DATE: 7/1/2012
 DATE: 7/1/2012
 DATE: 7/13/2012

POLICY: CUSTOMER COMPLAINTS AND APPEALS

SCOPE: This policy applies to the TransPorte Department.

PROCEDURE:

A complaint is a customer’s expressed feeling of dissatisfaction concerning services provided by the TransPorte Department. Customers may file complaints via the “Complaint Intake Form” available on the TransPorte buses. The TransPorte Department will provide help completing the form to customers in need of assistance. Please contact the TransPorte Director at 219-326-8274 if you need the form in an alternate format.

The Director of the TransPorte Department will investigate all complaints and provide the customer with a proposed resolution. If a customer does not agree with the TransPorte Department’s decision, an appeal may be filed at the City of La Porte Human Resources Department within seven (7) days of the decision. The customer may appeal an unsatisfactory decision made by the Human Resources Department to the Mayor within seven (7) days of the Human Resources Department’s decision.

To Use TransPorte

Please call TransPorte at **(219) 362-6565** to schedule your ride – tell us where you want to be picked up and where you would like to go, and the time you would like to be picked up.

TransPorte will take you anywhere you want to go within the City of La Porte and ¼ mile fringe!

Please remember TransPorte is a “shared Ride” origin to destination service. We will make every effort to serve you at the pick-up and drop-off times requested, but due to scheduling constraints this will not always be possible.

TYPES OF SERVICE AVAILABLE

TransPorte provides three types of trips:

1. Subscription trips – A pre-scheduled trip for a future date that has no end date. For example, Jane Doe needs to go to the grocery store every Saturday at 10:00 AM.

2. Scheduled trips – A pre-scheduled trip that is arranged **24 hours before** the actual trip is made. For example, John Doe schedules a trip today to go to the doctor tomorrow at 1:00 PM. This means you will need to call the Dispatcher to schedule destination trip 24 hours in advance between the hours of 6:00 AM and 5:30 PM the day before you plan to ride.

3. Demand-response trips – A trip requested for the day you call, either right away or at a later time. These trips are handled as drivers become available, after the type 1 and 2 trips are honored.

Please note: *If you fail to appear for a scheduled trip, you will be charged the fare which was due for the missed trip, as well as the fare for the trip you are making the next time you request TransPorte service. “Exceptions will be made for circumstances that were beyond your control causing the missed trip” at the Dispatchers’ or the Manager’s discretion.*

FARE SCHEDULE

ONE WAY TRIPS

\$3.25 – General Public

\$2.50 – Senior/Disabled

\$1.25 -- Ages 6 to 11 when riding with full fare adult. Children under 6 years ride **free** when riding with a full fare adult.

Passes are available at the TransPorte office and from TransPorte drivers. By mail, from TransPorte: 102 “L” Street, La Porte, IN 46350

10 Ride passes

\$30.00 – General

\$22.50 -- Senior/Disabled

TIPS FOR OUR RIDERS

1. Your TransPorte vehicle will arrive at the curb of your requested pick-up point. Please be there for the vehicle. The vehicle cannot wait if you are not there when it arrives.
2. Have your pass or cash ready when the vehicle stops. Please have the correct change.
3. Stay seated when the vehicle is moving. Wait for the vehicle to come to a complete stop before standing.
4. When exiting, please check to be sure you have all of your personal belongings and packages.
5. Use passes whenever possible as they are more economical!

MISSION STATEMENT

It is the mission of TransPorte, through the efforts of dedicated and well trained employees to provide all citizens and visitors with safe, reliable and efficient transportation, which continues to grow and meet their needs.

TransPorte services are provided on a non-discriminatory basis. If you believe you have been discriminated against on the basis of race, gender, age, sexual orientation, disability or national origin, you may file a complaint with TransPorte, the Director of Human Resources for the City of La Porte or directly with the U.S. Federal Transit Administration: Director, Office of Civil Rights Federal Transit Administration.

Director: Office of Civil Rights
Federal Transit Administration
400 Seventh Street, SW, Room 7412
Washington, DC 20590

**“Our City’s Wheels” Since
1973**

TransPorte

**A shared Ride, Origin to Destination, Public
Transportation System Using Climate-
Controlled, Handicapped Accessible Vehicles
for Safety and Comfort.**

TransPorte is convenient and easy to use!

**Discounts for Seniors and Disabled
Patrons:**

If you are 60+ years of age and can show proof
of age then you may qualify for a discount
fare.

TransPorte is accessible to persons with
disabilities.

If you have a disability then you may qualify
for a discount fare.

For more information: Please call Dispatch at
(219) 362-6565.



Hours of Operation

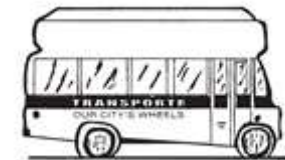
**6:00 AM to 6:00 PM
Monday thru Friday**

**9:00 AM to 2:00 PM
Saturday**

Closed all major holidays

**Call for a Ride: (219) 362-6565
(219) 362-OKOK**

This brochure is available in alternate
formats by contacting TransPorte at the
number above, or by email at
transporte@cityoflaportein.gov



**"Las Ruedas de Nuestra Ciudad"
"Desde el 1973"**

TransPorte

Un viaje compartido, desde su punto de partida hasta su destinación.

Sistema de Transportación Público

Utilizando Control de Clima

Vehículos Discapacitado Accesibles
para comodidad y seguridad

¡TransPorte es conveniente y fácil de usar!

Descuentos para mayores de edad y discapacitados

Si usted tiene 60+ años de edad y demuestra comprobante de edad, usted puede calificar para un descuento.

Si usted tiene algún impedimento o discapacidad, también puede calificar para un descuento.

Para más información, por favor llame al Despacho al (219) 362-6565. Para asistencia en español llame El Puente al (219)-575-9394.

TransPorte es accesible a personas con impedimentos y discapacidades.

TransPorte
102 " L " Street
La Porte, Indiana 46350

Las Ruedas de Nuestra Ciudad



Horas de Operación:

6:00 AM a 6:00 PM

de Lunes a Viernes y

9:00 AM a 2:00 PM

los Sábados

Cerrado durante días feriados

Llame para transportación:

(219) 362-6565

Este folleto está disponible en formatos alternos al comunicarse con TransPorte:

Teléfono: (219) 326-8274

Email: bwest@cityoflaportein.gov



Revisado el 1 de agosto de 2020

Para Utilizar El Servicio

Por favor llame a TransPorte al (219) 362-6565 para citar su transportación. Para asistencia en español, llame El Puente al (219)-575-9394. Díganos donde quiere que le recoja y donde quiere que le dejen. Por favor provee la hora de la recogida. TransPorte le lleva a cualquier lugar que desea ir, dentro de la ciudad de La Porte y hasta una 1/4 milla afuera de la ciudad.

Recuerde que TransPorte es un viaje que comparte con otros desde su punto de partida hasta su destinación. Haremos todo lo posible de servirle a su hora y punto de partida de preferencia, pero debido a nuestro horario, esto no siempre será posible.

Tipos de Servicios Disponible

TransPorte provee tres tipos de viajes:

- 1. Viajes suscritos-** Un viaje citado para un día futuro sin una fecha final. Por ejemplo, Jane Doe necesita ir a la tienda todos los sábados a las 10:00 am.
- 2. Viajes citados-** Un viaje citado 24 horas antes del viaje actual. Por ejemplo, John Doe fija un viaje hoy para ir a una cita con su doctor mañana a la 1:00 pm. Esto significa que tiene que llamar al Despachador con anticipación entre las 6:00 am y 5:30 pm el día antes que piensa viajar.
- 3. Viajes pedidos** - Un viaje que se exige para el mismo día que usted llama, enseguida o más tarde. Estos tipos de viajes son concedidos según la disponibilidad de choferes, después que los viajes tipos 1 y 2 son cumplidos.

Favor de notar: Si usted no se presenta a su viaje, se le cobrará por ese y por el próximo viaje que haga utilizando los servicios de TransPorte. Excepciones serán permitidos dependiendo de circunstancias fuera de su control que le cause faltar ese viaje," a la discreción de los Despachadores o del Director.

PRECIOS PARA VIAJES

VIAJES DE IDA

\$3.25- Público en general
\$2.50 - Mayores (60 años o más)/ Discapacitados
\$1.25 - Edades de 6 a 11 años acompañados por un adulto pagando precio completo.
Niños menores de 6 años viajan gratis si acompañados de un adulto pagando precio completo.

Se puede adquirir pases en la oficina de TransPorte o de los choferes de TransPorte. También por correo, TransPorte Office: 102 "L" Street, La Porte, IN 46350.

Pases para 10 viajes

\$30.00 - General
\$22.50 Mayores (60 años o más) / Discapacitados

CONSEJOS PARA NUESTROS VIAJEROS

1. Su vehículo de TransPorte llegará a la acera de su punto de partida. Por favor esté presente para el vehículo. El vehículo no puede esperar si usted no está presente cuando él llega.
2. Tenga su pase o dinero listo cuando el vehículo pare. Por favor tenga el cambio correcto.
3. Manténgase sentado mientras el vehículo esta andando. Espere que pare completamente antes de ponerse de pie.
4. Antes de bajarse, chequee que tenga todas sus pertenencias y paquetes.
5. ¡Use los pases cuando se le haga posible ya que son más económicos!

DECLARACIÓN DE MISIÓN

Atreves de los esfuerzos y la dedicación de nuestros empleados entrenados, es la misión de TransPorte de proveerles a todos los ciudadanos y visitantes con transportación segura, confiable, y eficaz, que continúa desarrollando y cumpliendo con sus necesidades.

Los servicios de TransPorte se proveen sin discriminación. Si usted cree que ha sido discriminado a base de raza, género, edad, orientación sexual, impedimento o origen nacional, usted puede hacer una querrela con TransPorte, el Director de Servicios Humanos para la Ciudad de La Porte o directamente con la Administración Federal de Transito de E.U.:

Director: Office of Civil Rights
Federal Transit Administration
400 Seventh Street, SW Room 7412
Washington, DC 20590



2020 Title VI Questionnaire

(REFERENCES: FTA Circular 4702.1B)

I. GENERAL REPORTING REQUIREMENTS:

A. MOST RECENTLY FILED ANNUAL TITLE VI CERTIFICATIONS AND ASSURANCES

*Execution Date of your most recent Certification and Assurances filed with NIRPC
March 19, 2019.*

B. COPY OF PROCEDURES FOR FILING A TITLE VI COMPLAINT and a summary for investigating and tracking Title VI complaints.

Procedure is included.

C. LIST OF ALL ACTIVE TITLE VI INVESTIGATIONS, LAWSUITS OR COMPLAINTS naming your organization which allege discrimination on the basis of race, color, or national origin with respect to transit service or other transit benefits. Include: date lawsuit or complaint was filed, summary of the allegation, status of investigation, lawsuit or complaint, and actions taken in response (including whether or not the parties involved have entered into a consent decree).

(The lawsuit/complain/investigation information here should be transit service-related and/or transit benefit-related. If your organization has any contractors that provide some or all of your transportation service, provide investigation/lawsuit/complaint information for those entities also.)

There are no current Title VI investigations, lawsuits, or complaints naming TransPorte which allege discrimination on the basis of race, color, or national origin with respect to transit service or other transit benefits.

E. COPY OF PLAN OR POLICY FOR PROVIDING LANGUAGE ASSISTANCE FOR PERSONS WITH LIMITED ENGLISH PROFICIENCY.

Describe how information and programs are accessed for those individuals who are Limited English Proficient (LEP). Include the actions taken to ensure the benefits,

resources and services are provided to them. If a plan does not exist, provide a policy or description on how this is performed.

Plan may be based on the DOT LEP Guidance or an alternative framework.

TransPorte has translated its brochure into Spanish, which is the predominant language other than English spoken in its service area. In addition, the website uses Google Translate, which can render the information in dozens of languages.

F. COPY AND DESCRIPTION OF NOTIFICATION TO THE PUBLIC OF PROTECTION UNDER TITLE VI.

Describe how the agency provides information regarding Title VI obligations (programs operated without regard to race, color, and national origin) to the public. List and describe the media tools used to post and distribute this information. (Media tools can include but not limited to websites, bus postings, brochures, complaint forms.)

The TransPorte brochure and website both notify the public of their Title VI rights. In addition, a Title VI notice is made available in the rider binder available on each vehicle.

II. PROGRAM SPECIFIC REQUIREMENTS FOR GRANTEE IN URBANIZED ZONE AREAS OF 200,000 OR MORE:

TransPorte is located in a UZA with a population of 66,025 (2010)

A. COLLECTION OF DEMOGRAPHIC DATA.

FTA Requirement: Submit maps and charts demonstrating the collection and analysis of racial and ethnic data showing the extent to which members of minority groups are beneficiaries of programs receiving Federal financial assistance.

Requirement Summary: Submit the following; demographic and service profile maps and charts, survey information on customer demographic and travel patterns, and/or a locally developed alternative.

B. MODIFIED SYSTEMWIDE SERVICE STANDARDS AND POLICIES.

FTA Requirement: Submit a copy of systemwide service standards and policies. Describe the impact of the service standard or policy changes on the minority community, if any. Changes resulting in an adverse impact upon the minority community must be identified, including the actions the agency has taken or will take to eliminate, minimize or mitigate

Title VI Complaint Form

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. (41 U.S.C. Section 2000a).

The Environmental Justice component of Title VI guarantees fair treatment for all people and provides for the City of Valparaiso to identify and address, as appropriate, disproportionately high and adverse effects of its programs, policies, and activities on minority and low-income populations, such as undertaking reasonable steps to ensure that Limited English Proficiency (LEP) persons have meaningful access to the programs, services, and information the City of Valparaiso provides.

The City of Valparaiso works to ensure non-discriminatory transportation in support of our mission to be the Northwest Indiana leader in providing effective, coordinated and integrated multimodal transportation solutions to enhance the social and economic quality of life for all Valparaiso citizens. The City of Valparaiso Transportation Manager is responsible for Civil Rights Compliance and Monitoring to ensure non-discriminatory provision of transit services and programs.

Name _____

Home Number _____ Email Address _____

Work Number _____

Address _____

City _____ Zip Code _____

List type of discrimination (please check all that apply)

Race

Color

National Origin

Other _____

Please indicate your race/color, if it is a basis of your complaint _____

Please describe your national origin, if it is a basis of your complaint _____

Location where incident occurred: _____

Time and date of incident: _____

Name/Position title of person who allegedly subjected you to Title VI discrimination:

Briefly describe the incident (use a separate sheet, if necessary): _____

Did anyone else witness the incident? Yes () No ()

List witnesses. (Use a separate sheet, if necessary)

Name _____

Address _____

Telephone Number _____

Name _____

Address _____

Telephone Number _____

Have you filed a complaint about this incident with the Federal

Transit Administration? Yes () No ()

If yes, when? _____

I hereby swear/affirm that the information that I have provided in this Title VI Complaint Form is true and correct to the best of my knowledge, information and belief.

Your Signature:	Today's Date:
Action taken (to be completed by Title VI Investigator):	
Accepted for formal investigation on _____/_____/_____	Referred to another department on _____/_____/_____
Rejected because _____	

Title VI Investigator

Today's Date

This form is available in alternate format upon request.

If you need assistance in completing this form please contact Tyler Kent, Transportation Manager, (219)-462-1161. Tkent@valpo.us

City of Valparaiso

Title VI Program

V-Line/ChicaGO DASH

Submittal Date
11-11-2019

2019 Title VI Questionnaire

(REFERENCES: FTA Circular 4702.1B)

I. GENERAL REPORTING REQUIREMENTS:

A. MOST RECENTLY FILED ANNUAL TITLE VI CERTIFICATIONS AND ASSURANCES

V-Line/ChicaGO DASH Annual Title VI Certification and Assurances was approved on March 2nd, 2017.

B. COPY OF PROCEDURES FOR FILING A TITLE VI COMPLAINT and a summary for investigating and tracking Title VI complaints.

Response:

Discrimination Complaint Process

It is the policy of the City of Valparaiso to provide internal complaint and investigation procedures to encourage early solution of civil rights-based complaints within the organization and to monitor policies, practices and actions. This policy is in addition to any existing grievance and complaint procedures. The procedure is as follows:

All complaints alleging discrimination based on race, color, or national origin in a service or benefit provided by the City of Valparaiso will be directly addressed by the City of Valparaiso. The City of Valparaiso shall also provide appropriate assistance to complaints, including those persons with disabilities, or who are limited in their ability to communicate in English. Additionally, the City of Valparaiso shall make every effort to address all complaints in an expeditious and through manner. Complaints must be filed within thirty (30) calendar days of the alleged discriminatory action. The complaint form (Appendix A) can be found on the City website, where bus tickets are sold, at City Hall, or by request to 219-462-1161.

A letter of acknowledge receipt of complaint will be mailed within thirty (30) days (APPENDIX B). Please note that in responding to any request for additional information, a complaint's failure to provide the requested information may result in the administrative closure of the complaint.

If the complaint is not resolved internally by the City of Valparaiso, the complaint will be forwarded to the Northwestern Indiana Regional Planning Commission for review.

- C. **LIST OF ALL ACTIVE TITLE VI INVESTIGATIONS, LAWSUITS OR COMPLAINTS** naming your organization which allege discrimination on the basis of race, color, or national origin with respect to transit service or other allegation, status of investigation, lawsuit or complaint, and actions taken in response (including whether or not the parties involved have entered into a consent decree).

Response: NONE

- E. **COPY OF PLAN OR POLICY FOR PROVIDING LANGUAGE ASSISTANCE FOR PERSONS WITH LIMITED ENGLISH PROFICIENCY.**

Describe how information and programs are accessed for those individuals who are Limited English Proficient (LEP). Include the actions taken to ensure the benefits, resources and services are provided to them. If a plan does not exist, provide a policy or description on how this is performed.

Response:

When requested by an individual(s) who is Limited English Proficient, the City of Valparaiso will contact the Valparaiso University Office of International Programs. The Office of International Programs will translate the requested information as needed. The partnership is in accordance to the City's Limited English Proficiency Policy (Appendix C). 100% of V-Line riders who complete a survey in 2013 reported English as the preferred language for information on the buses.

- F. **COPY AND DESCRIPTION OF NOTIFICATION TO THE PUBLIC OF PROTECTION UNDER TITLE VI.**

Describe how the agency provides information regarding Title VI obligations (programs operated without regard to race, color, and national origin) to the public. List and describe the media tools used to post and distribute this information. (Media tools can include but not limited to websites, bus postings, brochures, complaint forms.)

Response:

As a recipient of funds, the FTA, the City of Valparaiso must provide an opportunity for public comment prior to the implementation of significant service changes, thus, the City of Valparaiso has developed a fare and service change policy. The purpose of this policy is to achieve environmental justice by reviewing any fare or service change to the transportation services that has the potential to adversely impact minority and low-income populations. The policy includes the frequency and timing of public notices for service or fare changes.

Attached as Appendix D is an example of a Notice to the Public about a Public Hearing. Attached as Appendix E, please find a copy of the Public Comment Policy for Permanent Service/Route Design and Fare Increase and the Temporary Route Policy. Appendix H is a copy of the posting onboard all V-Line and ChicaGO DASH buses.

To ensure equal access public hearing notices are posting using various media. Public notices are published on the City's website, at City Hall, Facebook, on the Valparaiso Transit bus tracker application, and the newspapers. Additional notices maybe placed in bus shelters, at the library.

II. PROGRAM SPECIFIC REQUIREMENTS FOR GRANTEES IN URBANIZED ZONE AREAS OF 200,000 OR MORE:

A. COLLECTION OF DEMOGRAPHIC DATA.

FTA Requirement: Submit maps and charts demonstrating the collection and analysis of racial and ethnic data showing the extent to which members of minority groups are beneficiaries of programs receiving Federal financial assistance.

Requirement Summary: Submit the following; demographic and service profile maps and charts, survey information on customer demographic and travel patterns, and/or a locally developed alternative.

Response:

Maps of census tracts within Valparaiso Transit service areas showing minority population percentages. Data source is the US Census Bureau's 2010 Census.

See Appendix F and Appendix E's subsection "Level and Quality of Service Monitoring" of the City's collection of demographic data.

B. MODIFIED SYSTEMWIDE SERVICE STANDARDS AND POLICIES.

FTA Requirement: Submit a copy of systemwide service standards and policies. Describe the impact of the service standard or policy changes on the minority community, if any. Changes resulting in an adverse impact upon the minority community must be identified, including the actions the agency has taken or will take to eliminate, minimize or mitigate the adverse impact. If there have been no changes in service standards and policies within this timeframe, please respond accordingly.

Requirement Summary: Submit a complete copy of your system wide service standards and policies including standards for on-time performance and transit security.

Briefly describe the impact of each change on minority communities in your service area. If any change resulted in adverse impacts on minority communities, describe actions taken (or to be taken) to eliminate, minimize, or mitigate these adverse impacts.

Response:

No changes have been made to the V-Line routes. Reference appendix E for to review the City's systemwide service and policies.

C. **SYSTEMWIDE SERVICE AND FARE CHANGES**

FTA Requirement: Submit an equity evaluation of service changes and fare changes and proposed improvements at the planning and programming stages to determine whether those changes have a discriminatory impact.

Requirement Summary: Assess the effects of the proposed fare or service change on minority and low-income populations or the alternatives available for the people affected. Describe the actions proposed to minimize, mitigate, or offset any adverse effects and determine if any of the proposals would have a disproportionately high adverse effect on minority and low-income riders.

Response: Attached as Appendix D, a copy of the Public Comment Policy for Permanent Service/Route Design and Fare Increase and Temporary Route Change Policy is provided.

Surveys are available on all service revenue vehicles at all times. The V-Line will continue to review the surveys and adjust as needed.

D. **TITLE VI INTERNAL MONITORING TRANSIT SERVICE PROCESS NARRATIVE**

FTA Requirement: Document any disparities arising out of your monitoring processes relative to levels and quality of service. If any disparities were identified, provide a narrative describing the disparity, and the action(s) you have taken or will take to remedy the situation.

Requirement Summary: Document the utilization of the monitoring portion of your Title VI internal review process in identifying and resolving a disparity by choosing either the level of service, quality of service, or analysis

of customer surveys, or locally developed procedure methods. If you conducted no monitoring, make a statement to that effect but note your future intent to do so.

Response: Reference Appendix G for the full list of Internal Monitoring Processes and results of the City's Monitoring.

E. **IMPACT OF TRANSIT CONSTRUCTION AND MAJOR MOBILITY IMPROVEMENT ACTIVITIES.**

FTA Requirement: Submit a list of construction and major mobility improvement activities currently in the TIP and provide a discussion of the impact (of the projects) on the minority community. If this information has already been provided to the FTA regional office in an environmental impact statement (EIS), environmental assessment (EA), or planning study, provide only the document name and page numbers which reference these projects.

Requirement Summary: This requirement applies only to operators with major construction and mobility improvement projects in the current (2014-2017) TIP. Provide the list of projects and assessment of the projects' impact on minority communities. If the impact information has already been submitted to FTA, cite the document name and page numbers.

(For NICTD only)

Response:

Not applicable

Appendix A: Title VI Complaint Form

Title VI Complaint Form

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that “no person in the United States shall, on the ground of **race, color, or national origin**, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. (41 U.S.C. Section 2000d).

The Environmental Justice component of Title VI guarantees fair treatment for all people and provides for the City of Valparaiso to identify and address, as appropriate, disproportionately high and adverse effects of its programs, policies, and activities on minority and low-income populations, such as undertaking reasonable steps to ensure that Limited English Proficiency (LEP) persons have meaningful access to the programs, services, and information the City of Valparaiso provides.

The City of Valparaiso works to ensure non-discriminatory transportation in support of our mission to be the Northwest Indiana leader in providing effective, coordinated and integrated multimodal transportation solutions to enhance the social and economic quality of life for all Valparaiso citizens. The City of Valparaiso Transportation Manager is responsible for Civil Rights Compliance and Monitoring to ensure non-discriminatory provision of transit services and programs.

Name _____
Home Number _____ Email Address _____
Work Number _____
Address _____
City _____ Zip Code _____
List type of discrimination (please check all that apply)
 Race Color
 National Origin Other _____
Please indicate your race/color, if it is a basis of your complaint _____
Please describe your national origin, if it is a basis of your complaint _____
Location where incident occurred: _____
Time and date of incident: _____
Name/Position title of person who allegedly subjected you to Title VI discrimination:

-1-

Briefly describe the incident (use a separate sheet, if necessary): _____

Did anyone else witness the incident? Yes () No ()

List witnesses. (Use a separate sheet, if necessary)

Name _____

Address _____

Telephone Number _____

Name _____

Address _____

Telephone Number _____

Have you filed a complaint about this incident with the Federal Transit Administration?

Yes () No ()

If yes, when? _____

I hereby swear/affirm that the information that I have provided in this Title VI Complaint Form is true and correct to the best of my knowledge, information and belief.

Your Signature:	Today's Date:
Action taken (to be completed by Title VI Investigator): Accepted for formal investigation on ____/____/____ Rejected because _____	Referred to another department on ____/____/____

Title VI Investigator

Today's Date

This form is available in alternate format upon request.

If you need assistance in completing this form please contact Don Lorntzen, Transportation Manager, (219)-462-1161. Dlorntzen@valpo.us

Appendix B: Sample Receipt Letter

Sample Letter Acknowledging Receipt of Complaint

Date:

Mr. Doe
000 Main Street
Valparaiso, IN 46383

Dear Mr. Doe

This letter is to acknowledge receipt of your complaint against the City of Valparaiso alleging

_____.

An investigation will begin shortly. If you have any additional information you wish to convey or questions, concerning this matter, please feel free to contact this office by phone at _____, or by writing to the following address.

Title VI Coordinator
City of Valparaiso
City Administrator
166 Lincolnway
Valparaiso, IN 46383

Thank you,

Appendix C

Limited English Proficiency Policy Statement and Available Resources

Title VI of the Civil Rights Act of 1964 U.S.C 2000d, et seq., provides that no person shall be subject to discrimination on the basis of race, color, or national origin under any program or activity that receives Federal financial assistance. Title VI and its implementing regulations require that FTA recipients take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP). To that end, The City of Valparaiso (V-Line and ChicaGO DASH) provides translation and interpretation service free of charge upon request by calling 219-462-1161

Approved by the Valparaiso Board of Works and Safety on May 26th, 2011

Attention: Public Hearing Notice

A Public Hearing will be held on _____, 10 a.m. at Valparaiso City Hall to discuss the proposed permanent route changes to the Yellow and Green routes as the routes currently operate. The Yellow route will operate on Bullseye Lake road from Campbell Street to Calumet Avenue. The Yellow Route will extend service from Vale Park Road to Valparaiso Street and connect to Wall Street. The Green Route will extend service on Sturdy Road from Chicago Street to LaPorte Avenue. Service on the Chicago Street from Sturdy Road to Silhavy would be eliminated.

Reasonable Accommodations Provided: Valparaiso City Hall is ADA accessible; designated parking is available. Please let us know five (5) days in advance of the meeting if you need additional reasonable accommodations. Contact: Tyler Kent, Transit Director at 219-462-1161.

Written or Taped Comments will be Accepted in advance of the meeting and for 2 days after the meeting. Send to Don Lorntzen at Dlorntzen@valpo.us or City of Valparaiso, 166 Lincolnway, Valparaiso, IN 46383.

****Requests for alternate formats please contact Don Lorntzen at Dlorntzen@valpo.us or 219-462-1161. ****

Appendix E

PUBLIC COMMENT POLICY FOR SERVICE/ROUTE DESIGN AND FARE INCREASES

APPROVED BY THE VALPARAISO BOARD OF WORKS, February 28, 2013

The V Line and Chicago Dash allow for a public comment period before increasing fares, adding new permanent routes, or eliminating permanent routes. All of the aforementioned permanent changes are subject to approval by the Board of Public Works and Safety of the City of Valparaiso, Indiana (“BOW”) in accordance to FTA regulations.

Permanent Route Changes: a route modification that permanently decreases the route by a minimum of ten percent of the total original route miles, the creation of a new permanent route or a permanent elimination of an existing route.

Before permanently adding new routes or permanently extending routes into areas without service, Staff will publicize through legal notices, and public hearings to obtain additional input. Based upon public input, staff makes recommendations to the BOW which will approve or deny permanent changes.

Public notices will be posted on all City buses, at all published map locations, City Hall, and the V Line and/or ChicaGo Dash websites. A hearing will be set to eliminate a permanent route when funding is cut or the route fails to meet the criteria established in the *City of Valparaiso Performance Standards Policy*, (See Appendix A).

The V Line and/or ChicaGo Dash staff will e-mail public notices to the City of Valparaiso Planning Department and post the public notice on the information located inside of City Hall’s main doors at least ten days prior to the public hearing.

V Line and/or ChicaGo Dash staff will advertise public hearings in *The NWI Times* and/or *Post Tribune* Legal Section at least ten days prior to the meeting. The legal notice shall include a detailed description of the changes including street names, the meeting's date, time, and location. V Line and/or ChicaGo Dash staff may elect to publish an advertisement in *the NWI Times* or in other local newspapers as an invitation to the hearing.

The permanent changes will be posted in Valparaiso City Hall, at all published map locations, on the V Line and/or ChicaGo Dash websites, and in the City buses for a minimum of two weeks prior to the public hearing, with an invitation to attend the public hearing.

Public hearings are held in Valparaiso City Hall before members of the BOW. Hearing comments are tape recorded. The BOW Chairman calls the hearing to order and takes comments in order of the names on the sign-in sheet that is passed around prior to the meeting call to order. After the people who signed in have spoken, the chairman asks if there are comments from those who did not have the chance to sign in. During these hearings, people are granted one opportunity to speak. The BOW may ask questions of those who speak and of staff in order to render a decision.

Amended by the Valparaiso Board of Works on February 28, 2013.

Appendix A

CITY OF VALPARAISO PERFORMANCE STANDARDS POLICY

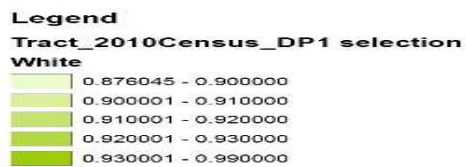
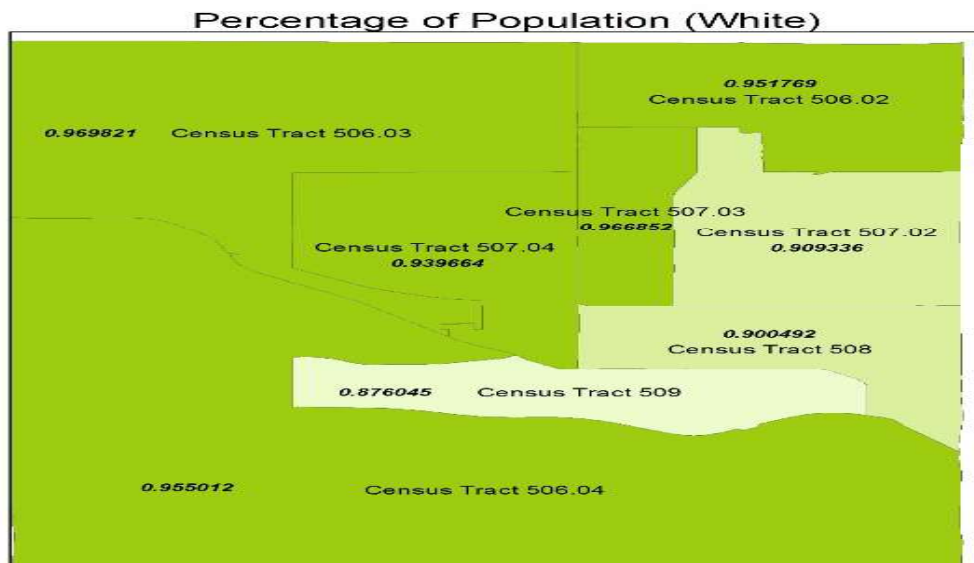
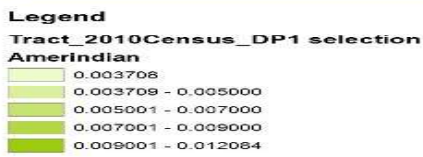
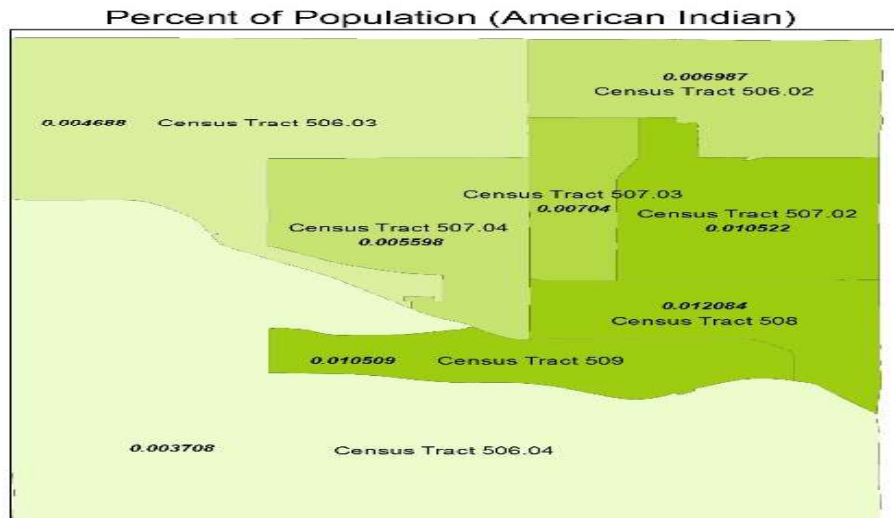
Pursuant to the policies of the City of Valparaiso, Indiana, , the V Line Fixed Route Deviated System is subject to performance standards set to reflect local goals and transit industry standards for each category. If a route is not meeting the standards, a public hearing may be called to take comments regarding eliminating and/or changing a route. The performance standards of the Board of Public Works and Safety of the City of Valparaiso, Indiana (“BOW”), are as follows:

1. **Revenue per Service Mile.** This is one means of measuring the efficiency of the system. Acceptable performance is established at 60 percent of the system average.
2. **Revenue to Cost Ratio.** This measure is the primary efficiency indicator of the system. It is the percentage of operating costs that are recovered by revenue. Acceptable performance is established at 60 percent of the system average.
3. **Passengers per Service Mile.** The number of passengers per route service mile is an indicator of the effectiveness of the system. Acceptable performance is established at 60 percent of the system average.
4. **Passengers per Service Hour.** Another way of measuring the effectiveness of the system is the number of passengers per hour. Acceptable performance is established at 60 percent of the system average.

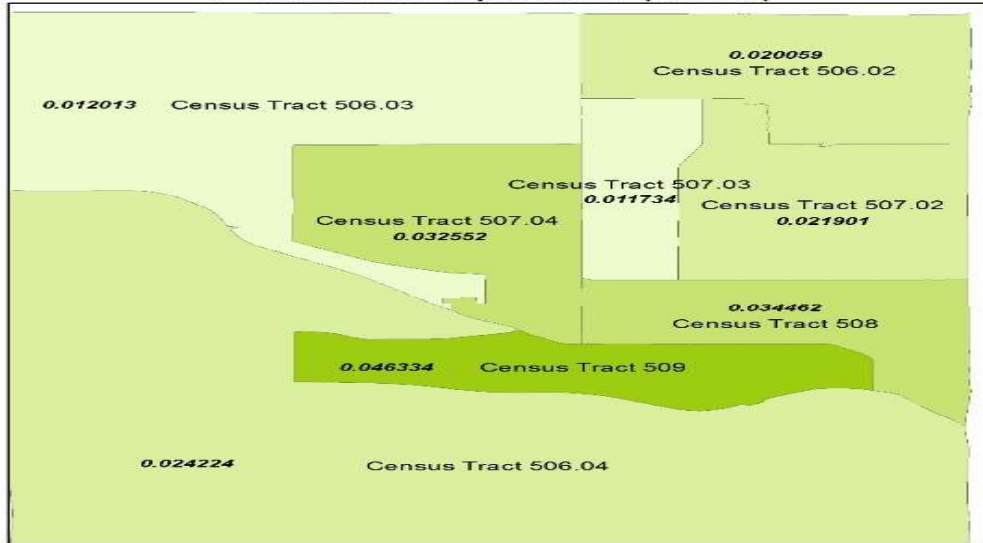
The performance measures are used in designating substandard routes, which are subject to appropriate measures for improving their performance. In conducting the Semi-Annual Route Analysis, the following special considerations are also used in making recommendations for deletions or modifications of routes:

1. No route shall be discontinued where such action can be reasonably expected to cause a significant negative impact upon the remainder of the system.
2. The BOW may waive the previous provisions and establish special goals and provisions for experimental routes.
3. An experimental route that fails to meet the specific goals that were established for it may be designated as substandard and terminated.
4. Any route may be modified or terminated as directed by the BOW, thereby superseding any or all of the provisions that would be otherwise applicable.

Appendix F: Demographic Maps, Ridership, and Riders Surveys



Percent of Population (Asian)



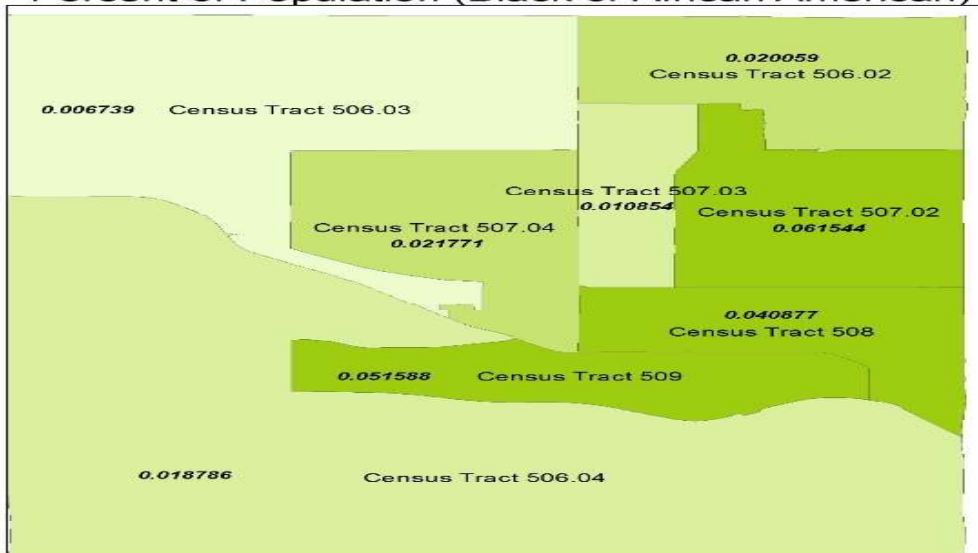
Legend

Tract_2010Census_DP1 selection

Asian



Percent of Population (Black or African American)



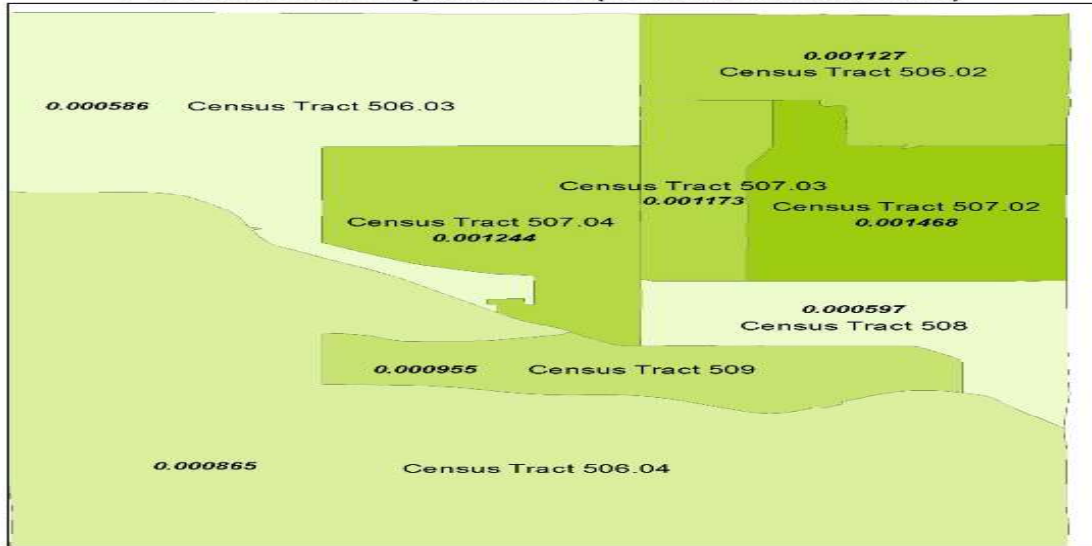
Legend

Tract_2010Census_DP1 selection

Black



Percent of Population (Native Hawaiian)



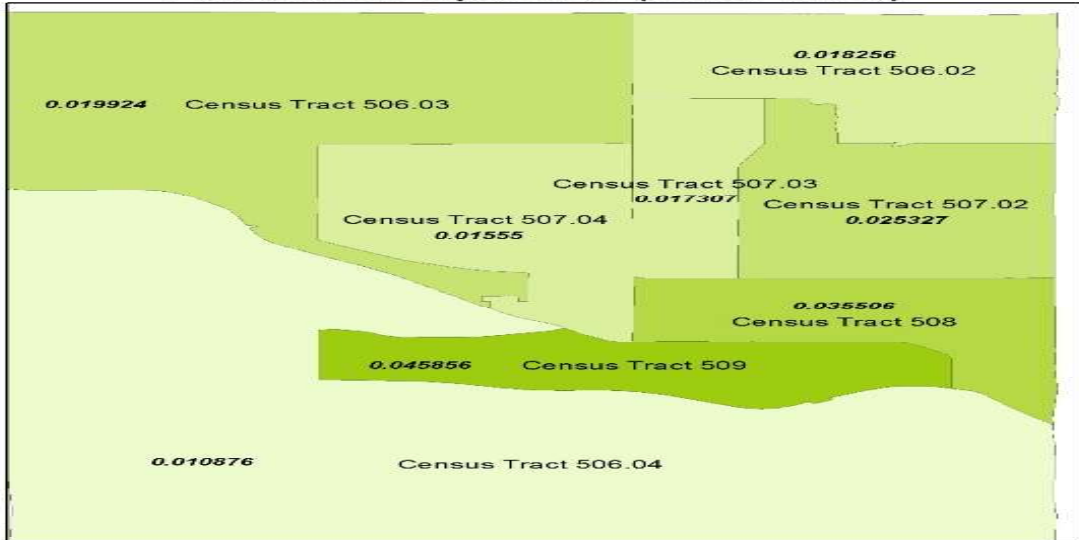
Legend

Tract_2010Census_DP1 selection

Native Hawaiian



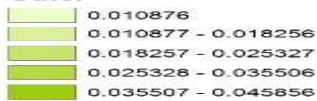
Percent of Population (Other Race)



Legend

Tract_2010Census_DP1 selection

Other



Four Factor Analyses:

The following data was provided by surveys from the V-Line riders and ridership stats.

V-Line Ridership

2007	6,885
2008	52,994
2009	63,790
2010	72,001
2011	87,718
2012	100,586
2013	124,195
2014	131,480
2015	131,549
2016	121,556
2017	111,979
2018	108,732

ChicaGO DASH Ridership

2009	18,205
2010	32,260
2011	46,349
2012	47,986
2013	55,037
2014	62,491
2015	64,709
2016	61,368
2017	56,948
2018	63,309

On-Time Performance of the V-Line Service (needs improvements 1 – 10 good as it gets)

80% of the V-Line riders rate the V-Line the on-time performance on 8 or better.

16% of the V-Line riders rated the on-time performance between 4-7.

4% of the V-Line riders rated the on-time performance between 0-3.

How often your V-Line bus route runs on weekdays (needs improvement 1 -10 good as it gets)

78% of the V-Line riders rated the frequency of weekday service an 8 or better.

16% of the V-Line riders rated the frequency of weekday service between 4-7.

6% of the V-Line riders rated the frequency of the weekday service between 1-3.

How often you V-Line bus route runs on weekends (needs improvement 1 -10 good as it gets)

67% of V-Line riders rated the frequency of weekend service an 8 or better.

27% of V-Line riders rated the frequency of the weekend service between 4-7.

6% of the V-Line riders rated the frequency of the weekend service between 1-3.

How old are the V-Line riders?

0% Under 16 years

32% 16 – 25 Years

13% 26 – 35 years

25% 36 – 50 years

30% 50+

Are you male or female?

69% Female

31% Male

V-Line riders consider themselves

10% African American

4% Hispanic/Latino

69% Caucasian/White

2% American Indian

Appendix G: Title VI Internal Review and Supplemental Title VI Standards

City of Valparaiso Title VI Internal Review Process Components

Purpose: Section 601 of the Title VI of the Civil Rights Act of 1964 states the following: “No person in the United States shall on the grounds of race, color, or national origin, be excluded from participation under any program or activity receiving federal financial assistance.”

To achieve this purpose, each federal department and agency which provides financial assistance for any program or activity is authorized and directed by the Department of Justice to effectuate provisions of Title VI for each program or activity by using generally applicable rules, regulations, or requirement. In this regard, the responsibility of the Federal Transit Administration is to ensure that federally supported transit service and related benefits are distributed by applicants, recipients, and sub recipients of Federal Transit Administration assistance on a manner consistent with Title VI. The employment practices of a grant applicant, recipient are also covered under Title VI if the primary purpose of the FTA-support program is to provide employment or those employment practices would result in discrimination against beneficiaries of FTA-assisted services and benefits.

City of Valparaiso Title VI Employment Policy

The City of Valparaiso complies with all aspects of governmental regulations concerning equal employment opportunity and affirmative action. It aggressively promotes an atmosphere which assures all persons the opportunity to succeed on his/her own merits regardless of race, color, sex, religion, national origin, ancestry, age or disability.

The City of Valparaiso’s equal employment policy as stated in the Employee Handbook reads as follows:

The City of Valparaiso is committed to providing equal employment opportunities for all applicants and employees. Applicants and employees shall be treated fairly and equally. Employment decisions will comply with all applicable state and federal discrimination laws, and made without regard to race, color, gender, sex, sexual orientation, religion, national origin, age, disability, veteran’s status, political affiliation, or citizenship. In addition, the City will not tolerate any discrimination, by anyone, including but not limited to, co-workers, supervisors, department heads, elected or appointed officials, vendors and the general public. This policy applies to all employment decisions including, but not limited to, recruiting, hiring, compensation, training, promotion, termination and all other terms and conditions of employment. Any employee who believes that they have witnessed or has been subject to discrimination has a duty to immediately report the incident to Valparaiso Human Resources Department in accordance to this policy.

It is the official policy of the City to:

1. Recruit, hire and promote for all job classifications without regard to race, color, sex, religion, national origin, ancestry, age, sexual orientation, political affiliation, veteran's status, or disability.
2. Base decisions on employment so as to further the principles of equal employment in accord with the City's affirmative action plan.
3. Insure that promotion decisions are in accord with the principles of equal employment opportunity by imposing only job-related requirements for promotional opportunities.
4. Acknowledge its intent to abide by this policy by including the words "Equal Employment Opportunity Employer" in all recruitment advertising, and on all City letterhead.
5. Insure that all other personnel actions such as compensation, benefits, transfers, layoffs, return from layoff, education, City sponsored training, tuition assistance, social and recreational programs, will be administered without regard to race, color, sex, veteran's status, sexual orientation, religion, national origin, ancestry, age, political affiliation or disability.
6. Special meetings will be held at least annually with executive, management and supervisory personnel to explain the intent of the City's equal employment opportunity policy, and individual responsibility for effective implementation, and clarify the City's position on equal employment opportunity. The date of these meetings will be recorded and specified in the City's EEO/Affirmative Action Plan.

Title VI Service Policy

As a recipient of FTA assisted benefits, The City of Valparaiso shall insure that any person who is, or seeks to be, a patron of any public vehicle which is operated as a part of, or on conjunction with, a project shall be given the same access, seating and other treatment with regard to the use of such vehicle as other persons without regard to race, color or national origin.

It shall not discriminate against any person or group of persons with regard to the availability of quality of transportation service furnished as part of the project on the basis of race, color, or national origin. Frequency of service, age, quality and numbers of vehicles assigned to specific areas shall not be determined on the basis of race, color, or national origin.

It shall ensure that opportunities to participate in the transit planning and decision-making processes are provided to persons without regard to race, color, or national origin.

Title VI Fare and Service Change Policy

As a recipient of funds from the Federal Transportation Administration, the City of Valparaiso must provide an opportunity for public comment prior to implementation of significant service changes, Thus, the City of Valparaiso has developed a fare and service change policy. The purpose of this policy is to achieve environmental justice by reviewing any fare or service change to the transportation services that has the potential to adversely impact minority and low-income populations.

This policy affects any proposed temporary or permanent fare increases or proposed major service reduction. This includes a reduction in service span, days of week, or the frequency of the service.

In the case of a service reduction, the City of Valparaiso and the Northwestern Indiana Regional Planning Commission will review the matter to determine if the intent of the Title VI program or of any agreement between the City of Valparaiso and the Northwestern Indiana Regional Planning Commission is affected.

In the event of any changes to fare and services the City of Valparaiso will provide notification as follows:

- The public shall be notified by the City of Valparaiso of the proposed change by posting a notice at The City of Valparaiso business office for a period of thirty (30) calendar days prior to the effective date if the change.
- The City of Valparaiso shall post the notice on all revenue vehicles for a period of thirty (30) calendar days prior to the effective date of the change.
- The City of Valparaiso shall deliver to the Northwestern Indiana Regional Planning Commission a copy of the notice at least thirty (30) calendar days prior to the effective date of the change.
- The notice shall contain information describing the proposed fare increase or service reduction, the service area affected, and the effective date of the change.
- The City of Valparaiso shall adhere to any applicable federal or state laws and regulations concerning notifications.
- The notice may be combined with the notification of the public hearing.

A public hearing shall be held at a convenient time and place for the public. More than one such hearing may be necessary, because of travel distance or time of day. An evening or weekend hearing maybe necessary, for example, to hear comment from service users who largely work during the day.

The following procedures shall be followed by the City of Valparaiso regarding the public hearing:

- The hearing shall be held in a place accessible to the disabled.
- In order for the City of Valparaiso to consider views and comments made by the public, the public hearing is to take place at least fourteen (14) calendar days prior to the effective date of the service change. This will allow for a reconsideration of the proposed change in the face of significant public opposition.
- A legal notice, issued by the City of Valparaiso announcing the public hearing, shall be published in the Northwest Indiana Times in the general circulation in each county in which the service change is to take place. Publication shall be twenty-one (21) calendar days of the effective date of the service change. The notice(s) shall appear between seven (7) and fourteen (14) days prior to the date of the hearing.
- The notice of the public hearing shall also be posted at Valparaiso City Hall and on all revenue vehicles as least seven (7) calendar days prior to the date of the hearing.

- Notification of the public hearing, including the legal notice(s) and posting, shall indicate the time, date, place and purpose of the hearing. The service change shall be described in adequate detail. Including in such notifications shall be an offer to employ a signer for deaf upon request. Such notifications shall also state that written views and comments will be accepted at Valparaiso City Hall.
- An address, telephone number and name of contact person for the City of Valparaiso and the Northwestern Indiana Regional Planning Commission shall appear in the notifications.
- A court report shall provide a written transcript of the hearing proceedings and shall deliver a transcript of the proceedings to the City of Valparaiso and to the Northwestern Indiana Regional Planning Commission as least seven (7) days prior to the effective date of the service change.
- All costs of the public hearing included legal notices, court reported, signer, etc. are the responsibility of the City of Valparaiso.

The City of Valparaiso Contractor Compliance Provision

As the City of Valparaiso contracts with private providers to operate its transit services, the following provisions are included in all service contracts:

The City of Valparaiso, in accordance with Title VI of the Civil Rights Act of 1964, 78 STAT.252,42 U.S.C 2000D to 2000D-4 and Title 49, Code of Federal Regulations, Department of Transportation, Sub-Title A, Office of the Secretary, Part 21, Nondiscrimination in Federally Assisted Programs of Transportation issued pursuant to such act, hereby notifies all contractors that it will affirmatively insure that, in regard to any contract entered into, minority business enterprises will not be discriminated against on the grounds of race, color, sex, or national origin.

The City of Valparaiso receives federal financial assistance to carry out programs under the Federal Transit Administration Act of 1964, as amended. Scheduling, quality of service, frequency of service, age and quality of vehicles assigned to an era, may not be determined on the basis of race, color, sex, or national origin.

During the performance of the contract, the contractor for itself, its assignees and successors in interest agree to comply with the regulations relative to nondiscrimination in federally assisted programs of the Department of Transportation Title 49, Code of Federal Regulations, Part 21, as they may be amended from time to time (hereinafter referred to as the regulations), which are herein incorporated by reference and made part of the contract between the contractor and the City of Valparaiso.

The contractor, with regard to work performed during the contract, shall not discriminate on the grounds of race, color, or national origin in the selection and retention of subcontractors, including procurement materials and leases of equipment. The contractor shall not participate either directly or indirectly in the discrimination prohibited by Section 21.5 of the regulations, including employment practices when the contract covers a program set forth in appendix b of the regulations.

The following procedures shall be adhered to by the contractor to comply with Title VI of the Civil Rights Act in regard to equal employment opportunity.

- In all solicitations either by competitive bidding or negotiations made by the contract for work to be performed under a subcontract, including procurements of materials or leases of equipment, each potential subcontractor or supplier shall be notified by the contractor of the contractor's obligations under this contract and all regulations relative to nondiscrimination on the grounds of race, color, or national origin.
- The contractor will not discriminate against any employee or applicant for employment because of race, creed, color, age, sex, disability or national origin. The contractor will take affirmative action to ensure that applicants are employed and that employees are treated during employment without regard to their race, religion, color, sex, age, disability or national origin. Such action shall include, but not limited to: employment, upgrading, demotion or transfer, recruitment or recruitment of advertising, layoff or termination, rates of pay or other compensations and selection of training, including apprenticeship.
- The contractor will, in all solicitations or advertisements for employees placed by or on behalf of the contractor, state that all qualified applicants will receive consideration for employment without regard to race, religion, color, sex, age, disability, or national origin.
- The contractor will comply with all provisions of Executive Order 11246 of September 24, 1965, and with rules, regulations, and relevant orders of the Secretary of Labor.
- The contractor will furnish all information and reports required by Executive Order 11246 of September 24, 1965, and by rules, regulations, and orders of the Secretary of Labor, or pursuant thereto and will permit access to his/her books, records and accounts for the purpose of investigation to ascertain compliance with such rules, regulations and orders.

In the event of the contractor's noncompliance with the nondiscrimination clauses of this contract, or with any said rules, regulations or orders, the contract may be cancelled, terminated or suspended in whole or in part, and the contractor may be declared ineligible for further government contracts in accordance with procedures authorized by Executive Order 11246 of September 24, 1965, and such other sanctions may be imposed and remedies invoked as provided by Executive Order 11246 of September 24, 1965, or by rule, regulation, or otherwise provided by law.

The Contractor must also follow these same aforementioned provisions in any subcontract or purchase order issued to fulfill the contract held with the City of Valparaiso. This will ensure that such provisions will be binding upon each subcontractor or vendor as the administering agencies may direct as a means of enforcing such provisions, including sanctions for noncompliance. This provision will apply unless exempted by rules, regulations or orders of the Secretary of Labor issued pursuant to Section 204 of Executive Order 11246 of September 24, 1965.

In the event a contractor becomes involved in or is threatened with litigation with subcontractor or vendor as a result of such directions by the administering agency, the contractor may request the United States to enter litigation to protest the interests of the United States.

The City of Valparaiso Service Standards

The primary service area for the V-Line bus are all areas located within $\frac{3}{4}$ of a mile of the City of Valparaiso. The ChicaGo Dash transit service provides service from the Valparaiso Village Station located at 58 South Campbell Street to the Loop in Downtown Chicago. The service standards set forth by the City of Valparaiso are documented as follows:

- All passengers are treated with courtesy.
- No discrimination in providing service or employment based upon age, sex, race or religion.
- Service is provided to as many persons in need within the constraints of the resources available.
- Written service policies are available and communicated to the passengers
- Fee schedule is published, and fees applied consistently, if fees are charged.
- Waiting time is minimized.
- Drivers are identified as representatives of the service provider organization.
- Passengers and community feedback is solicited through surveys.

To monitor compliance with Title VI, The City of Valparaiso uses the following factors:

- **Vehicle Load** – The vehicle load factor is a ratio of the number of seats on a vehicle to the number of passengers. The load factor is an indicator of the extent of probable overcrowding or the need for additional vehicles. As a service standard, the load factor is determined by taking the number of seats available in a specific area and dividing that into the number of passengers that are actually carried during a trip.
- **Vehicle Assignment** – Vehicle assignment refers to the process by which transit vehicles are assigned throughout the City of Valparaiso Service.
- **Vehicle Headway** – Vehicle headway is a measurement of the time interval between two vehicles traveling in the same direction on the same route. The frequency of service is a general indicator of the level of service provided along a route and a factor in the calculation of the amount of travel time expended by a passenger to reach his/her destination.

The City of Valparaiso Title VI Internal Review Process

The Title VI internal review process has not been implemented in any decision-making process but will be used in the future. The City of Valparaiso is included in the NIRPC planning process.

The City of Valparaiso Compliance Monitoring

The internal monitoring process ensures that the level and quality of service is consistent among different user groups, and the degree to which service is responsive to minority needs.

Level and Quality of Service Monitoring:

The City of Valparaiso's internal guidelines for making a determination of compliance with Title VI include two types of monitoring; level of service monitoring and quality of service monitoring. To aid in this monitoring and in compliance with the Federal Transit Administration

Title VI guidelines, the City of Valparaiso uses the following demographic and service profile information:

- 2000 Census Tract Map for the City of Valparaiso
- 2000 Census of Population by Race for the City of Valparaiso

Using the data from the 2000 Census and other sources selected demographic characteristics for the City of Valparaiso are summarized as follows:

- The highest number of low income and working poor households are found in the area West of Sturdy Road, East of Hayes Leonard Road, South of Lincolnway and North of Morthland.
- The area West of Sturdy Road, East of Hayes Leonard Road, South of Lincolnway and North of Morthland account for the majority of households without automobiles.

The Census information can be found in the appendix of this report.

1. Level of Service Monitoring

The City of Valparaiso service area for the V-Line bus are all areas located within $\frac{3}{4}$ of a mile of the City of Valparaiso. The ChicaGo Dash transit service provides service from the Valparaiso Village Station located at 58 South Campbell Street to the Loop in Downtown Chicago.

The following is a list of tracts within the City of Valparaiso's service area and the percent of vehicles assigned to these tracks.

Tract	% of African Americans	% of Asian	% of Vehicles
507.1	>1	2	33
507.2	2	1	66
508	2	1	100
509	3	1	100

No less than 33% of all census tracts within the City of Valparaiso's service area are evaluated to determine the level of service provided within each respective area. In addition to determining the level of service provided within the service areas, this evaluation includes an assessment of the factors identified as service standards for the City of Valparaiso, which include load factors, vehicle assignment, and vehicle headways to obtain access to transit. The City of Valparaiso service standards are then compared to the information obtained in the evaluation to determine if the evaluation identifies any instances in which the service provided to minority areas does not meet the City of Valparaiso service standards.

2. Quality of Service Monitoring

Making the City of Valparaiso more responsive to rider's needs is a continuing process that requires input from our riders. Thus, to comply with Title VI, a survey is conducted

to determine travel patterns and opinions on the quality of service provided. Although the survey is conducted system wide, specific data is compiled from four (4) census tracts. This data includes passenger responses relative to the quality of service provided by the City of Valparaiso, travel patterns of transit users in the census tracts, a summary of comments regarding transit service, and the identification of the top three most-traveled destinations using the following:

- Average travel time to destination
- The number of stops and/or length of time before reaching destination
- The total cost of the trip to the destination
- The cost per mile to reach the destination

A comparison of the survey results relative to the selected tracts is conducted to determine if the quality of service within minority tracts is comparable to that which is provided in non-minority tracts.

Frequency of Monitoring

Biennial Title VI reviews are conducted in conjunction with the Northwestern Indiana Regional Planning Commission biennial review process.

Title VI Administration

Questions regarding Title VI or potential discriminatory practices or matters within the scope of employment are directed to the GM of the contracted service provider, and the City of Valparaiso Transportation Manager.

Discrimination Complaint Process

It is the policy of the City of Valparaiso to provide internal complaint and investigation procedures to encourage early solution of civil rights-based complaints within the organization and to monitor policies, practices and actions. This policy is in addition to any existing grievance and complaint procedures. The procedure is as follows:

All complaints alleging discrimination based on race, color, or national origin in a service or benefit provided by the City of Valparaiso will be directly addressed by the City of Valparaiso. The City of Valparaiso shall also provide appropriate assistance to complaints, including those persons with disabilities, or who are limited in their ability to communicate in English. Additionally, The City of Valparaiso shall make every effort to address all complaints in an expeditious and thorough manner. Complaints must be filed within thirty (30) calendars days of the alleged discriminatory action.

A letter of acknowledgment receipt of complaint will be mailed within thirty (30) days (Appendix A). Please note that in responding to any request for additional information, a complaint's failure to provide the requested information may result in the administrative closure of the complaint.

If the complaint is not resolved internally by the City of Valparaiso, the complaint will be forwarded to the Northwestern Indiana Regional Planning Commission for review.

Definitions

1. Applicant means an eligible public or organization that submits application for financial assistance under any FTA Program.
2. Closed-Door Route Segment means that portion of a transit route in which there are not bus stops to board or disembark.
3. Compliance refers to a condition in which FTA has found that the applicant, recipient, or subrecipient has met the requirements in this circular, and there is no indication or evidence of discrimination on the basis of race, color, or national origin.
4. Contractor means any entity or organization which has entered into a contract relating to transit service delivery with an applicant, recipient, or subrecipient.
5. Covered Employment Practices refers to practices under federally assisted programs in which the primary objective of the federal financial assistance is to provide employment or if those practices would result in discrimination on the basis of race, color, or national origin against beneficiaries of federally assisted services and benefits.
6. Discrimination refers to any intentional or unintentional act, or any failure to act, which has the effect of excluding or denying a person from participation in benefits or has otherwise subjected a person to unequal treatment under any program or activity because of race, color, or national origin.
7. Minority or Minority Group Persons include the following:
 - a. African Americans,” which include persons having origins in any of the Black racial groups of Africa;
 - b. “Hispanic Americans,” which include persons of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish or Portuguese culture or origin, regardless of race;
 - c. “Native America,” which include persons who are American Indians, Eskimos, Aleuts, or Native Americans;
 - d. “Asian-Pacific Americans,” which include persons whose origins are Japan, China, Korea, Vietnam, Laos, Cambodia, the Pacific, and Northern Marianas;
 - e. “Asian-Indian American,” who include persons whose origins are from India, Pakistan, and Bangladesh.
8. Minority Transit Route means a route that has at least 1/3 of its total route mileage in a census tract(s) or traffic analysis zone(s) with a minority population in the transit service.
9. National Origin means the particular Nation where a person was born, or where the person’s parents or ancestors were born.
10. Noncompliance means a failure to meet the requirement of Title VI and the regulations and orders of the Department issued there under or failure to implement an approved Title VI program.
11. Nonminority or Nonminority Group Persons means a White person, not of Hispanic origin, having origins in any original people of Europe, North Africa, or the Middle East.

12. Primary Residents means a recipient that is authorized or required to request federal assistance on behalf of subrecipients and distributes such financial assistance to subrecipients for the purpose of carrying out the program.
13. Probable Noncompliance refers to a condition in which FTA has found that the applicant, recipient, or subrecipient to take remedial or corrective actions to achieve compliance, or has initiated an enforcement action against applicant, recipient, or subrecipient.
14. Recipient means any State, Political subdivision, instrumentality, or any public or private agency, institution, department or other organization unit to whom financial assistance is directed by the FTA.
15. Secretary means the Secretary of DOT
16. Service Standards/Policy means an established policy or service performance measure used by a transit provider or other applicant, recipient, or subrecipient as a means to plan, program, or distribute services and benefits within its service area.
17. Subcontractor means any entity or organization which has entered into a subcontractor relating to transit service delivery with a contractor to provide a service in connection with a program or activity initiated by the applicants, recipient, or subrecipient.
18. Subrecipient means any entity that receives FTA financial assistance through a primary recipient.
19. Title VI Program means the system of requirements, procedures, actions, and sanctions adopted by Federal, State, and local agencies and other recipients, and subrecipients which are deemed necessary and appropriate to comply with Title VI of the Civil Rights Act of 1964, and the implementing regulations issued by the DOJ and the DOT.
20. Travel Time means the total travel time from an origin location in a census tract/traffic analysis zone to a destination in another or same census/traffic analysis zone and includes or equals the sum of the following components:

The walking time or riding time, in a private vehicle, from the origin location in a census /traffic analysis zone to the transit access location (called out of transit vehicle travel time), calculated at a walking speed of 3 miles per hour, or riding speed of 25 miles per hour,

The average scheduled in transit vehicle peak hour time or total time where more than one vehicle to the same destination is involved.

The waiting time or times calculated as ½ of the headway(s), and if transfers are required, the sum of the waiting times for each transfer made.

21. FTA Activity means any program of assistance authorized by sections of the UMTA Act, the Federal Urban System Program (23 U.S.C 142 (a) (2); and the Interstate Transfer Program 23 U.S.C 103 (e) (4)).
22. Demand Response – Curb to curb service that is available with 24-hour advance reservations.

NOTICE

The V-Line shall not discriminate against any person or group of persons with regard to the availability or quality of transportation service furnished as a part of the project on the basis of race, color, or national origin. Frequency of service, age, quality and number of vehicles assigned to specific areas shall not be determined on the basis of color, race or national origin.

Available in accessible/alternative formats by contact Don Lorntzen at 219-462-1161, Dlorntzen@valpo.us

NOTICE

The ChicaGo Dash shall not discriminate against any person or group of persons with regard to the availability or quality of transportation service furnished as a part of the project on the basis of race, color, or national origin. Frequency of service, age, quality and number of vehicles assigned to specific areas shall not be determined on the basis of color, race or national origin.

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DP-1-Geography-Valparaiso city, Indiana: Profile of
 General Population and Housing Characteristics:
 2010

2010 Demographic Profile Data

NOTE: For more information on confidentiality
 protection, non-sampling error, and definitions, see
<http://www.census.gov/prod/cen2010/doc/dpsf.pdf>.

Subject	Number	Percent
SEX AND AGE		
Total population	31,730	100.0
Under 5 years	1,878	5.9
5 to 9 years	1,906	6.0
10 to 14 years	1,860	5.9
15 to 19 years	2,466	7.8
20 to 24 years	3,696	11.6
25 to 29 years	2,597	8.2
30 to 34 years	2,123	6.7
35 to 39 years	2,005	6.3
40 to 44 years	1,794	5.7
45 to 49 years	1,881	5.9
50 to 54 years	1,992	6.3
55 to 59 years	1,831	5.8
60 to 64 years	1,533	4.8
65 to 69 years	978	3.1
70 to 74 years	842	2.7
75 to 79 years	732	2.3
80 to 84 years	749	2.4
85 years and over	867	2.7
Median age (years)	33.4	(X)
16 years and over	25,700	81.0
18 years and over	24,964	78.7
21 years and over	22,844	72.0
62 years and over	5,075	16.0
65 years and over	4,168	13.1
Male population	15,432	48.6
Under 5 years	967	3.0
5 to 9 years	1,005	3.2
10 to 14 years	951	3.0
15 to 19 years	1,272	4.0
20 to 24 years	1,796	5.7
25 to 29 years	1,371	4.3
30 to 34 years	1,108	3.5
35 to 39 years	1,021	3.2
40 to 44 years	897	2.8
45 to 49 years	930	2.9

50 to 54 years	934	2.9
55 to 59 years	875	2.8
60 to 64 years	725	2.3
65 to 69 years	434	1.4
70 to 74 years	329	1.0
75 to 79 years	302	1.0
80 to 84 years	261	0.8
85 years and over	254	0.8
Median age (years)	31.5	(X)
16 years and over	12,300	38.8
18 years and over	11,930	37.6
21 years and over	10,866	34.2
62 years and over	2,016	6.4
65 years and over	1,580	5.0
Female population	16,298	51.4
Under 5 years	911	2.9
5 to 9 years	901	2.8
10 to 14 years	909	2.9
15 to 19 years	1,194	3.8
20 to 24 years	1,900	6.0
25 to 29 years	1,226	3.9
30 to 34 years	1,015	3.2
35 to 39 years	984	3.1
40 to 44 years	897	2.8
45 to 49 years	951	3.0
50 to 54 years	1,058	3.3
55 to 59 years	956	3.0
60 to 64 years	808	2.5
65 to 69 years	544	1.7
70 to 74 years	513	1.6
75 to 79 years	430	1.4
80 to 84 years	488	1.5
85 years and over	613	1.9
Median age (years)	35.5	(X)
16 years and over	13,400	42.2
18 years and over	13,034	41.1
21 years and over	11,978	37.7
62 years and over	3,059	9.6
65 years and over	2,588	8.2
RACE		
Total population	31,730	100.0
One Race	31,053	97.9
White	28,512	89.9
Black or African American	1,036	3.3
American Indian and Alaska Native	107	0.3

Asian	667	2.1
Asian Indian	111	0.3
Chinese	263	0.8
Filipino	90	0.3
Japanese	18	0.1
Korean	44	0.1
Vietnamese	79	0.2
Other Asian [1]	62	0.2
Native Hawaiian and Other Pacific Islander	19	0.1
Native Hawaiian	1	0.0
Guamanian or Chamorro	13	0.0
Samoan	0	0.0
Other Pacific Islander [2]	5	0.0
Some Other Race	712	2.2
Two or More Races	677	2.1
White; American Indian and Alaska Native [3]	124	0.4
White; Asian [3]	164	0.5
White; Black or African American [3]	184	0.6
White; Some Other Race [3]	103	0.3
Race alone or in combination with one or more other races: [4]		
White	29,134	91.8
Black or African American	1,277	4.0
American Indian and Alaska Native	281	0.9
Asian	880	2.8
Native Hawaiian and Other Pacific Islander	32	0.1
Some Other Race	855	2.7
HISPANIC OR LATINO		
Total population	31,730	100.0
Hispanic or Latino (of any race)	2,263	7.1
Mexican	1,655	5.2
Puerto Rican	259	0.8
Cuban	16	0.1
Other Hispanic or Latino [5]	333	1.0
Not Hispanic or Latino	29,467	92.9
HISPANIC OR LATINO AND RACE		
Total population	31,730	100.0
Hispanic or Latino	2,263	7.1
White alone	1,357	4.3
Black or African American alone	33	0.1
American Indian and Alaska Native alone	35	0.1
Asian alone	0	0.0
Native Hawaiian and Other Pacific Islander alone	2	0.0
Some Other Race alone	664	2.1
Two or More Races	172	0.5
Not Hispanic or Latino	29,467	92.9
White alone	27,155	85.6

Black or African American alone	1,003	3.2
American Indian and Alaska Native alone	72	0.2
Asian alone	667	2.1
Native Hawaiian and Other Pacific Islander alone	17	0.1
Some Other Race alone	48	0.2
Two or More Races	505	1.6
RELATIONSHIP		
Total population	31,730	100.0
In households	28,794	90.7
Householder	12,610	39.7
Spouse [6]	5,244	16.5
Child	7,950	25.1
Own child under 18 years	6,288	19.8
Other relatives	937	3.0
Under 18 years	319	1.0
65 years and over	158	0.5
Nonrelatives	2,053	6.5
Under 18 years	105	0.3
65 years and over	72	0.2
Unmarried partner	878	2.8
In group quarters	2,936	9.3
Institutionalized population	1,070	3.4
Male	617	1.9
Female	453	1.4
Noninstitutionalized population	1,866	5.9
Male	926	2.9
Female	940	3.0
HOUSEHOLDS BY TYPE		
Total households	12,610	100.0
Family households (families) [7]	7,117	56.4
With own children under 18 years	3,396	26.9
Husband-wife family	5,244	41.6
With own children under 18 years	2,278	18.1
Male householder, no wife present	495	3.9
With own children under 18 years	259	2.1
Female householder, no husband present	1,378	10.9
With own children under 18 years	859	6.8
Nonfamily households [7]	5,493	43.6
Householder living alone	4,349	34.5
Male	1,891	15.0
65 years and over	326	2.6
Female	2,458	19.5
65 years and over	1,097	8.7
Households with individuals under 18 years	3,622	28.7
Households with individuals 65 years and over	2,864	22.7

Average household size	2.28	(X)
Average family size [7]	2.99	(X)
HOUSING OCCUPANCY		
Total housing units	13,506	100.0
Occupied housing units	12,610	93.4
Vacant housing units	896	6.6
For rent	436	3.2
Rented, not occupied	11	0.1
For sale only	162	1.2
Sold, not occupied	32	0.2
For seasonal, recreational, or occasional use	74	0.5
All other vacant	181	1.3
Homeowner vacancy rate (percent) [8]	2.3	(X)
Rental vacancy rate (percent) [9]	7.2	(X)
HOUSING TENURE		
Occupied housing units	12,610	100.0
Owner-occupied housing units	6,986	55.4
Population in owner-occupied housing units	17,495	(X)
Average household size of owner-occupied units	2.50	(X)
Renter-occupied housing units	5,624	44.6
Population in renter-occupied housing units	11,299	(X)
Average household size of renter-occupied units	2.01	(X)

X Not applicable.

[1] Other Asian alone, or two or more Asian categories.

[2] Other Pacific Islander alone, or two or more Native Hawaiian and Other Pacific Islander categories.

[3] One of the four most commonly reported multiple-race combinations nationwide in Census 2000.

[4] In combination with one or more of the other races listed. The six numbers may add to more than the total population, and the six percentages may add to more than 100 percent because individuals may report more than one race.

[5] This category is composed of people whose origins are from the Dominican Republic, Spain, and Spanish-speaking Central or South American countries. It also includes general origin responses such as "Latino" or "Hispanic."

[6] "Spouse" represents spouse of the householder. It does not reflect all spouses in a household. Responses of "same-sex spouse" were edited during processing to "unmarried partner."

[7] "Family households" consist of a householder and one or more other people related to the householder by birth, marriage, or adoption. They do not include same-sex married couples even if the marriage was performed in a state issuing marriage certificates for same-sex couples. Same-sex couple households are included in the family household's category if there is at least one additional person related to the householder by birth or adoption. Same-sex couple households with no relatives of the householder

present are tabulated in nonfamily households. "Nonfamily households" consist of people living alone and households which do not have any members related to the householder.

[8] The homeowner vacancy rate is the proportion of the homeowner inventory that is vacant "for sale." It is computed by dividing the total number of vacant units "for sale only" by the sum of owner-occupied units, vacant units that are "for sale only," and vacant units that have been sold but not yet occupied; and then multiplying by 100.

[9] The rental vacancy rate is the proportion of the rental inventory that is vacant "for rent." It is computed by dividing the total number of vacant units "for rent" by the sum of the renter-occupied units, vacant units that are "for rent," and vacant units that have been rented but not yet occupied; and then multiplying by 100.

Source: U.S. Census Bureau, 2010 Census.

More info: 4815 Female (61.8%) 2927 Male (36.2%) Total (98.0%)

Age group: 17-24 (12.2%) 25-34 (18.3%) 35-44 (18.1%) 45-54 (15.2%) 55-64 (12.1%) 65-74 (10.1%) 75-84 (8.1%) 85+ (4.1%)

Marital status: 1212 Single (15.3%) 2103 Married (26.5%) 1512 Divorced (19.1%) 1087 Widowed (13.7%) 600 Never married (7.6%)

Education: 1012 High school or less (12.7%) 2103 Bachelor's (26.5%) 1512 Master's (19.1%) 1087 Doctorate (13.7%) 600 Associate's (7.6%)

Income: 1012 \$0-\$14,999 (12.7%) 2103 \$15,000-\$24,999 (26.5%) 1512 \$25,000-\$34,999 (19.1%) 1087 \$35,000-\$49,999 (13.7%) 600 \$50,000-\$74,999 (7.6%)

Home ownership: 1012 Renter (12.7%) 2103 Owner (26.5%) 1512 Other (19.1%) 1087 Not in housing unit (13.7%) 600 Not in housing unit (7.6%)

Language spoken at home: 1012 English (12.7%) 2103 Spanish (26.5%) 1512 Other (19.1%) 1087 Not in housing unit (13.7%) 600 Not in housing unit (7.6%)

Hispanic or Latino: 1012 Hispanic (12.7%) 2103 Not Hispanic (26.5%) 1512 Not in housing unit (19.1%) 1087 Not in housing unit (13.7%) 600 Not in housing unit (7.6%)

Source: [U.S. Census Bureau, American Community Survey](#)

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Races in Valparaiso, IN (2017)

Race	Percentage
White	61.5%
Black	12.1%
Hispanic	6.0%
Asian	2.1%
American Indian	0.1%
Other	16.1%

Races in Valparaiso, Indiana, by ethnicity, foreign born residents, place of birth

According to our research of Indiana and other state sites, there were 67 registered sex offenders in Valparaiso, Indiana as of November 11, 2018. The total of registered sex offenders in Valparaiso is 6.96% of the total registered sex offenders in all residents in this city is near the state average.

Crime rates in Valparaiso by year

Type	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2027
Murders	0	0	1	0	0	1	1	0	0	1	0	1	0	0
per 100,000	0.0	0.0	0.5	0.0	0.0	0.2	0.3	0.0	0.0	0.5	0.0	0.5	0.0	0.0
Drugs	4	2	4	7	2	0	0	1	4	7	2	0	0	0
per 100,000	141	7.8	13.0	23.6	8.7	0.0	0.0	19.8	32.1	23.6	8.2	0.0	0.0	0.0

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According to our research, various other state bills from **year 2017** might have affected many of the same factors as of November 11, 2016. The table of all records below shows a comparison of 2016 to the state of Virginia's various offenses in this day a year of state average.

Crime rates by offenses by year												
Type	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021
Arrests	0	0	1	0	0	1	1	0	1	1	1	1
per 100K	0.0	0.0	0.1	0.0	0.0	0.1	0.1	0.0	0.1	0.1	0.1	0.1
Open	4	3	4	7	9	3	3	3	2	3	9	3
per 100K	14.3	11.2	15.0	26.0	31.7	11.0	11.0	11.0	7.7	11.0	33.0	11.0
MURDER	7	3	2	2	9	3	7	16	9	6	7	9
per 100K	25.0	11.9	7.7	7.7	31.5	11.0	23.0	54.0	30.0	22.0	25.0	31.5
Assault	76	71	66	51	55	96	97	21	21	15	20	22
per 100K	264.0	241.0	220.0	170.0	185.0	320.0	327.0	70.0	70.0	50.0	66.0	73.0
Exploit	66	34	36	21	19	15	19	17	16	16	17	17
per 100K	220.0	113.0	120.0	70.0	65.0	50.0	63.0	57.0	54.0	54.0	57.0	57.0
THEFT	491	456	518	604	625	551	461	461	381	442	511	491
per 100K	1630.0	1520.0	1720.0	2010.0	2080.0	1830.0	1530.0	1530.0	1270.0	1470.0	1700.0	1630.0
Auto Theft	38	38	42	48	21	42	37	31	34	44	20	21
per 100K	127.0	127.0	140.0	158.0	70.0	140.0	123.0	103.0	113.0	147.0	66.0	70.0
Alcohol	3	7	3	3	0	3	3	3	3	2	1	NA
per 100K	10.0	23.0	10.0	10.0	0.0	10.0	10.0	10.0	10.0	7.0	3.0	NA
City Data	191	193	201	191	191	205	197	193	191	191	194	191

City-Data.com crime index

