

Central Indiana Regional Transportation Authority

Title VI Program and Complaint Procedure

I. CIRTAs Policy of Nondiscrimination

The Central Indiana Regional Transportation Authority (CIRTA) operates programs without regard to race, color and national origin as provided by Title VI of the Civil Rights Act of 1964. No person shall be denied the benefits of CIRTA programs based on his or her race, color or national origin.

CIRTA is committed to practicing nondiscrimination. Persons believing they have been subjected to discrimination based on race, color or national origin may file a complaint with CIRTA. CIRTA will publicize the nondiscrimination policy and complaint procedures on its website (<http://www.cirta.us>).

II. CIRTA Discrimination Complaint Procedure

1. Any individual, group of individuals, or entity that believes they have been subjected to discrimination prohibited by nondiscrimination requirements may file a complaint against CIRTA. A formal complaint must be filed within 180 calendar days of the alleged occurrence.
2. Written, signed complaints should be submitted to: Executive Director, CIRTA, 320 N. Meridian St. Suite 406, Indianapolis, IN 46204. If the complainant is unable to provide a written complaint, a CIRTA staff member will assist the complainant in transcribing a verbal complaint into writing. The complaint must be signed by the complainant or his/her representative. Complaints must include dates of occurrences of discrimination and names and job titles of individuals involved when possible.
3. Upon receiving the written complaint, CIRTA will determine its jurisdiction, acceptability, need for additional information, and the investigative merit of the complaint.
4. Once CIRTA decides its course of action, the complainant and the respondent will be notified in writing of such determination within five calendar days. The complaint will be logged into the records of the CIRTA Executive Director, and the basis for the allegation identified including race, color, national origin, disability, age or sex.
5. In cases where CIRTA assumes investigation of the complaint, CIRTA will provide the respondent with the opportunity to respond to the allegations in writing. The respondent will have ten calendar days upon receipt, to furnish CIRTA with his/her response to the allegations.
6. Within 60 days of receipt of the complaint, the Executive Director will prepare a written investigative report. The report shall include a narrative description of the incident, identification of persons interviewed, findings and recommendations for disposition.
7. The recommendation shall be reviewed with CIRTA's attorney. The attorney may discuss the report and recommendations with the Executive Director and other appropriate CIRTA staff. The report will be modified as needed and made final for its release to the parties.
8. Once the investigative report becomes final, briefings will be scheduled with each party within 15 calendar days. Both the complainant and the respondent shall receive a copy of the investigative report during the briefings and will be notified of their respective appeal rights.

9. If the complainant or respondent is not satisfied with the results of the investigation of the alleged discriminatory practice(s), he or she shall be advised of their rights to appeal CIRTA's decision to the Federal Transit Administration, U.S. Department of Transportation or U.S. Department of Justice. The complainant has 180 calendar days after CIRTA's final resolution to appeal to USDOT. Appeals should be addressed to the Federal Transit Administration Region 5 Office, 200 West Adams Street, Suite 320, Chicago, Illinois 60606, Telephone: 312-886-3704.
10. An annual Log of Complaints will be maintained by CIRTA. The Log of Complaints will contain the following information for each complaint filed:
 - The name and address of the person filing the complaint
 - The date of the complaint
 - The basis of the complaint
 - The disposition of the complaint
11. CIRTA has received 0 complaints as of May 2, 2012, and has not been subject to any investigations or lawsuits.

III. CIRTA's Program of Access to Persons with Limited English Proficiency (LEP)

These individuals may be entitled to language assistance with respect to a particular type of service. The federal government and those receiving assistance from the federal government must take reasonable steps to ensure that LEP persons have meaningful access to the programs, services, and information those entities provide.

The following four factors contribute to the policies and procedures followed by CIRTA in providing assistance to LEP individuals.

Factor No. 1: The number or proportion of LEP persons in the CIRTA service area. The 2010 American Community Survey 1-Year Estimates quantify the proportion of residents aged five years and older that speak English less than "very well" by primary language. CIRTA's services are utilized primarily by people living in the Indianapolis-Carmel metropolitan area. The ACS indicates that of the 1,631,609 Indianapolis-Carmel metropolitan area residents aged five and older, 66,918 individuals speak English less than very well, or 4.1% of the total population.

The 2010 American Community Survey 1-Year Estimates Table B16001 provides language spoken at home by ability to speak English for the population aged 5 years and over:

	Indianapolis-Carmel, IN Metro Area	
	Estimate	Margin of Error
Total:	1,631,609	+/-3,404
Speak only English	1,484,924	+/-6,405
Spanish or Spanish Creole:	86,931	+/-3,915
Speak English "very well"	41,222	+/-4,980

Speak English less than "very well"	45,709	+/-3,939
French (incl. Patois, Cajun):	4,871	+/-1,675
Speak English "very well"	3,175	+/-803
Speak English less than "very well"	1,696	+/-1,422
French Creole:	1,044	+/-730
Speak English "very well"	801	+/-606
Speak English less than "very well"	243	+/-303
Italian:	1,146	+/-780
Speak English "very well"	980	+/-710
Speak English less than "very well"	166	+/-152
Portuguese or Portuguese Creole:	328	+/-247
Speak English "very well"	259	+/-226
Speak English less than "very well"	69	+/-113
German:	2,538	+/-691
Speak English "very well"	2,111	+/-667
Speak English less than "very well"	427	+/-359
Yiddish:	68	+/-98
Speak English "very well"	68	+/-98
Speak English less than "very well"	0	+/-267
Other West Germanic languages:	434	+/-469
Speak English "very well"	247	+/-200
Speak English less than "very well"	187	+/-292
Scandinavian languages:	307	+/-499
Speak English "very well"	307	+/-499
Speak English less than "very well"	0	+/-267
Greek:	989	+/-656
Speak English "very well"	490	+/-440
Speak English less than "very well"	499	+/-337
Russian:	1,407	+/-815
Speak English "very well"	774	+/-539
Speak English less than "very well"	633	+/-447
Polish:	599	+/-810
Speak English "very well"	449	+/-587
Speak English less than "very well"	150	+/-226
Serbo-Croatian:	672	+/-538
Speak English "very well"	317	+/-241
Speak English less than "very well"	355	+/-344
Other Slavic languages:	741	+/-653
Speak English "very well"	610	+/-538
Speak English less than "very well"	131	+/-150
Armenian:	0	+/-267
Speak English "very well"	0	+/-267
Speak English less than "very well"	0	+/-267
Persian:	1,086	+/-786
Speak English "very well"	896	+/-677
Speak English less than "very well"	190	+/-224
Gujarati:	2,549	+/-1,467
Speak English "very well"	1,976	+/-1,334
Speak English less than "very well"	573	+/-610
Hindi:	3,666	+/-1,671

Speak English "very well"	2,991	+/-1,514
Speak English less than "very well"	675	+/-662
Urdu:	980	+/-564
Speak English "very well"	745	+/-483
Speak English less than "very well"	235	+/-239
Other Indic languages:	3,677	+/-1,744
Speak English "very well"	2,200	+/-1,157
Speak English less than "very well"	1,477	+/-878
Other Indo-European languages:	591	+/-449
Speak English "very well"	446	+/-356
Speak English less than "very well"	145	+/-161
Chinese:	10,030	+/-2,499
Speak English "very well"	4,566	+/-1,610
Speak English less than "very well"	5,464	+/-1,714
Japanese:	1,681	+/-943
Speak English "very well"	644	+/-551
Speak English less than "very well"	1,037	+/-654
Korean:	1,628	+/-860
Speak English "very well"	640	+/-508
Speak English less than "very well"	988	+/-657
Mon-Khmer, Cambodian:	0	+/-267
Speak English "very well"	0	+/-267
Speak English less than "very well"	0	+/-267
Hmong:	156	+/-270
Speak English "very well"	156	+/-270
Speak English less than "very well"	0	+/-267
Thai:	257	+/-256
Speak English "very well"	140	+/-213
Speak English less than "very well"	117	+/-144
Laotian:	634	+/-841
Speak English "very well"	421	+/-619
Speak English less than "very well"	213	+/-252
Vietnamese:	1,567	+/-817
Speak English "very well"	560	+/-470
Speak English less than "very well"	1,007	+/-742
Other Asian languages:	3,316	+/-1,541
Speak English "very well"	1,707	+/-758
Speak English less than "very well"	1,609	+/-1,195
Tagalog:	1,755	+/-862
Speak English "very well"	1,498	+/-711
Speak English less than "very well"	257	+/-293
Other Pacific Island languages:	270	+/-208
Speak English "very well"	149	+/-147
Speak English less than "very well"	121	+/-152
Navajo:	0	+/-267
Speak English "very well"	0	+/-267
Speak English less than "very well"	0	+/-267
Other Native North American languages:	188	+/-170
Speak English "very well"	188	+/-170
Speak English less than "very well"	0	+/-267

Hungarian:	95	+/-156
Speak English "very well"	95	+/-156
Speak English less than "very well"	0	+/-267
Arabic:	2,945	+/-1,393
Speak English "very well"	2,276	+/-1,252
Speak English less than "very well"	669	+/-396
Hebrew:	118	+/-136
Speak English "very well"	118	+/-136
Speak English less than "very well"	0	+/-267
African languages:	7,154	+/-3,075
Speak English "very well"	5,278	+/-2,262
Speak English less than "very well"	1,876	+/-1,071
Other and unspecified languages:	267	+/-257
Speak English "very well"	267	+/-257
Speak English less than "very well"	0	+/-267

Factor No. 2. The frequency with which LEP individuals come into contact with the service. CIRTA has not formally tracked the number of interactions between its programs and LEP individuals. CIRTA's rideshare program has tracked the number of Spanish-speaking LEP individuals that have registered to receive information about ridesharing. Currently, there are 112 Spanish-speaking LEP persons in CIRTA rideshare database, or 1.46 percent of 7,651 registrants.

Factor No. 3: The nature and importance of service provided by CIRTA. CIRTA provides reverse commute public transportation, rideshare and transportation-related information and referral services. Through the provision of these programs, CIRTA transports people to jobs in three suburban communities, assists people in forming carpools and vanpools, funds vouchers for emergency rides home from work to people who rideshare, and provides information about and referrals to other transportation programs and services in Central Indiana.

Factor No. 4. The resources available to CIRTA to assure meaningful access to programs and services by LEP persons. CIRTA would need to dedicate funding to the translation of web-based and printed materials, and the hiring or contracting of one or more translators, in order to assure access by LEP persons. CIRTA's 2012 budget of \$2,591,809 is largely made up of federal grants that support the provision of reverse commute transportation, rideshare services, and a web-based directory of transportation options. Due to the size of the organization and limited resources, CIRTA should focus its language assistance efforts on extending access for persons speaking Spanish. In the past, CIRTA's rideshare program has translated one primary brochure into Spanish, has translated a form letter to rideshare participants into Spanish, and has employed one or more Spanish speakers who communicated verbally with Spanish-speaking LEP persons. Presently, one CIRTA employees is bilingual in English and Spanish.

IV. CIRTA's Public Participation Program

Recipients and sub-recipients of federal funding shall seek out and consider the viewpoints of minority and low-income populations in the course of conducting public outreach. CIRTA will take into

consideration the perspectives of the minority and low-income population when planning significant changes in the operation of programs and services. The 2010 American Community Survey 1-Year Estimates report that the income in the past 12 months of 12.5% of Indianapolis-Carmel metropolitan area residents aged 18 and over was below the poverty level. Concerning race and ethnicity, the American Community Survey 1-Year Estimates report that 109,222 of 1,759,229 of Indianapolis-Carmel metropolitan area residents were Hispanic or Latino and 286,207 were Black or African-American. 48,120 reported themselves to be Asian, 12,952 reported as American Indian and Alaska Native, 675 as Native Hawaiian or Pacific Islander, and 46,324 as some other race. When planning future significant changes to programs and services, CIRTAs will take measures to include the viewpoints of minority and low-income people that may include:

- Surveying of low-income and minority users of CIRTAs services through telephone interviews, in-person meetings or onboard surveys
- Holding well-advertised public input meetings in venues that are easily accessible to low-income and minority populations
- Coordinating with organizations serving potentially affected low-income and minority individuals