

***Federal Transit Administration
Title VI Program***

Northeastern Center, Inc.

Approved: June 20,2023

(Plan expires 3 years from date approved by the board)

Title VI Plan Table of Contents

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
Section 1: Title VI Plan Approval & Compliance Requirements

NEC Board of Directors acknowledged the plan in its current state with the knowledge that there will be additions/edits to the LEP elements of the plan to be presented to the board for final approval at the September meeting.

Title VI Plan
Adopted on: June 20,2023

Adopted by: Northeastern Center Board of Directors

Signature(s): _____

Approval:  Final approval set for September 19, 2023.

Annual Certifications and Assurances

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with Title VI regulations. This requirement shall be fulfilled when the applicant/recipient submits its annual certifications and assurances. Primary recipients will collect Title VI assurances from sub-recipients prior to passing through FTA funds.

Northeastern Center, Inc. will remain in compliance with this requirement by annual submission of certifications and assurances as required by INDOT.

The date of last submission of these certifications and assurances (at the time of this Plan's approval) is: February 25, 2021.

Title VI Plan Revision Log

Date Month/day/year	Section Revised	Summary of Revisions
6/2021	All sections	Updated to include current activities and meet FTA and state requirements
3/2023	All sections	Updated to include current activities and meet FTA and state requirements

Section 2: Title VI Policy Statement

Policy Statement

The Northeastern Center, Inc., operating demand response transit provider, as a recipient of Federal Transit Administration (FTA) grant dollars either directly from FTA or through the Indiana Department of Transportation (INDOT), will comply with the Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the U.S. Department of Transportation implementing regulations, FTA Circular 4702.1B, and INDOT Public Transportation requirements as specified in Master Grant Agreement, and State Management Plan. The Northeastern Center, Inc. operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act.

Section 3: Notice to the Public

Title VI Notice to the Public

The Northeastern Center, Inc.'s Notice to the Public is as follows:

Notifying the Public of Rights Under Title VI

Northeastern Center, Inc.

- The Northeastern Center, Inc. operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the Northeastern Center, Inc.
- For more information on the Northeastern Center, Inc.'s civil rights program, the procedures to file a complaint, or to file a complaint, please contact **Quality Improvement Coordinator, Spindler Administrative Building**, at **260-347-2453, (TTY 711 or 800-743-3333)**; or visit us at **220 S. Main St., Kendallville, IN 46755**. For more information, visit **www.nec.org**.

- For transportation-related Title VI matters, a complaint may also be filed directly with the:

Indiana Department of Transportation, Attn: Kimberly Ray, INDOT Title VI Program Manager, 100 North Senate Avenue, Indianapolis, IN 46204; 317-232-0924; kiray@indot.in.gov

Federal Transit Administration, Office of Civil Rights, Attention: Complaint Team, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

- If information is needed in another language, let the driver know and they can link with the interpreter service.

The Northeastern Center, Inc.'s Notice to the Public is posted in the public areas of the offices and inside the transit vehicles.

1. Northeastern Center Noble Outpatient, 1930 E. Dowling St., Kendallville, IN 46755
2. Northeastern Center Albion Outpatient, 833 E. Main St., Albion, IN 46701
3. Northeastern Center LaGrange Outpatient, 2155 N. State Road 9, LaGrange, IN 46761
4. Northeastern Center Steuben Outpatient, 3265 Intertech Drive, Angola, IN 46703
5. Northeastern Center DeKalb Outpatient, 1800 Wesley Road, Auburn, IN 46706
6. New Hope Clubhouse, 304 S. Lincoln St., Kendallville, IN 46755
7. Community Health and Outreach Center, 752 Wesley Road, Auburn, IN 46706
8. SGL I, 409 S. Lincoln St., Kendallville, IN 46755
9. SGL II, 1418 Beckland Drive, Angola, IN 46703.
10. Promise House, 119 Dagny Drive, Kendallville, IN 46755

Section 4: Title VI Complaint Procedure

The Northeastern Center, Inc.'s Title VI Complaint Procedure is made available in the following locations:

- Agency website, if available: www.nec@org
 - Hard copy in the central office
 - Agency Title VI Plan
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Any individual, group of individuals or entity that believes they have been discriminated against on the basis of race, color, or national origin by the Northeastern Center, Inc. may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form.

Any individual having filed a complaint or participated in the investigation of a complaint shall not be subjected to any form of intimidation or retaliation. Individuals who have cause to think that they have been subjected to intimidation or retaliation can file a complaint of retaliation following the same procedure for filing a discrimination complaint.

A complaint must be filed with the Quality Improvement Coordinator, Northeastern Center, Inc. no later than 180 days after the following:

1. The date of the alleged act of discrimination; or
2. The date when the person(s) became aware of the alleged discrimination; or
3. Where there has been a continuing course of conduct, the date on which that conduct was discontinued of the latest instance of the conduct.

Once the complaint is received, the Northeastern Center, Inc. will review it to determine if our office has jurisdiction. A copy of each Title VI complaint received will be forwarded to the Indiana Department of Transportation within ten (10) calendar days of receipt. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

The Northeastern Center, Inc. has 45 days to investigate the complaint. If more information is needed to resolve the case, the Northeastern Center, Inc. may contact the complainant requesting further information. The complainant has **10** business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within **10** business days, the Northeastern Center, Inc. can administratively close the case.

After the investigator reviews the complaint, the agency will issue one of two (2) letters to the complainant: a closure letter or a letter of finding (LOF).

- ✓ A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.
- ✓ A letter of finding (LOF) summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur.

If the complainant wishes to appeal the decision it must direct the appeal to the agency initially. The complainant has **7** days after the date of the closure letter or the letter of finding to do so. If there is outstanding concern, the appeal may be directed to the state DOT or FTA. The appeal process information will be included in the letter.

A person may also file a complaint directly with the: Indiana Department of Transportation, Attn: Kimberly Ray, INDOT Title VI Program Manager, 100 North Senate Avenue, Indianapolis, IN 46204; 317-232-0924; kiray@indot.in.gov

Or

Federal Transit Administration, Office of Civil Rights, Attention: Complaint Team, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

Section 5: Title VI Complaint Form

The Northeastern Center, Inc.'s Title VI Complaint Procedure is made available in the following locations:

- Agency website, if available: www.nec.org
- Hard copy in the central office
- Agency Title VI Plan

Section I:					
Name:					
Address:					
Telephone (Home):			Telephone (Work):		
Email Address:					
Accessible Requirements?	Format	Large Print		Audio Tape	
		TDD		Other	
Section II:					
Are you filing this complaint on your own behalf?				Yes*	No
*If you answered "yes" to this question, go to Section III.					
If not, please supply the name and relationship of the person for whom you are complaining:					
Please explain why you have filed for a third party: _____					
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.				Yes	No
Section III:					
I believe the discrimination I experienced was based on (check all that apply):					
<input type="checkbox"/> Race		<input type="checkbox"/> Color		<input type="checkbox"/> National Origin	
Date of Alleged Discrimination (Month Day, Year) _____					
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.					

Section IV					
Have you previously filed a Title VI complaint with this agency?				Yes	No
Section V					
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?					
<input type="checkbox"/> Yes		<input type="checkbox"/> No			
If yes, check all that apply:					
<input type="checkbox"/> Federal Agency: _____					
<input type="checkbox"/> Federal Court _____		<input type="checkbox"/> State Agency _____			

<input type="checkbox"/> State Court _____ <input type="checkbox"/> Local Agency _____
Please provide information about a contact person at the agency/court where the complaint was filed.
Name:
Title:
Agency:
Address:
Telephone:
Section VI
Name of agency complaint is against:
Contact person:
Title:
Telephone number:

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date required below

Signature

Date

Please submit this form to:

**Quality Improvement Coordinator
 Northeastern Center, Inc.
 P.O. Box 817, Kendallville, IN 46755
 260-347-2453
 www.nec.org**

Section 6: List of Transit Related Title VI Investigations, Complaints and Lawsuits

The Northeastern Center, Inc. maintains a list or log of all Title VI investigations, complaints and lawsuits, pertaining to its transit-related activities.

Check One:

 X There have been no investigations, complaint and/or lawsuits filed against us since the last plan submission.

 There have been investigations, complaints and/or lawsuits filed against us. *See list below. Attach additional information as needed.*

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

Section 7: Public Participation Plan

Strategies and Desired Outcomes

To promote inclusive public participation, the Northeastern Center, Inc. will employ the following strategies, as appropriate (make these determinations based on a demographic analysis of the population(s) affected, type of plan, program and/or service under consideration, and the resources available):

- ✓ Provide for early, frequent and continuous engagement by the public
- ✓ Select accessible and varied meeting locations and times
- ✓ Employ different meeting sizes and formats
- ✓ Use social media in addition to other resources as a way to gain public involvement
- ✓ Use radio, television or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations may also include audio programming available on podcasts.
- ✓ Expand traditional outreach methods by visiting ethnic stores/markets and restaurants, community centers, libraries, faith-based institutions, local festivals, etc.

Public Outreach Activities

The public outreach and involvement activities conducted by the Northeastern Center, Inc. since the last Title VI Program submission are summarized in the table below.

Specific Public Participation activities are listed in the table below:

Event Date	Northeastern Center, INC. Staffer(s) or Department	Activity	Communication Method (Public notice, posters, social media)	Notes
4/01/2023	QI	Initial Survey	Posters, personal distributions	Distributed to all passengers
10/01/2023	QI	Semi Annual Survey of Users	Posters, personal distributions	Survey to be available at all times via QR code, Survey Monkey and available in print on buses.

Section 8: Language Assistance Plan

Plan Components

As a recipient of federal US DOT funding, the Northeastern Center, Inc. is required to take reasonable steps to ensure meaningful access to our programs and activities by limited-English proficient (LEP) persons.

Limited English Proficient (LEP) refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. This includes those who have reported to the U.S. Census that they speak English less than very well, not well, or not at all.

Item #1 The results of the <i>Four Factor Analysis</i> , including a description of the LEP population(s), served.
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Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered.

According to US Census 5 year estimates, (see Appendix A), the NEC Lagrange county service area has 12.15% of the population that speaks a Germanic primary language and report that they do not speak English well. This population would be the high concentration of Amish that live in the Western part of that county. The Noble County Community had 1505 Spanish speaking clients who report not speaking English well.

Factor 2: The frequency with which LEP persons come into contact with the program.

Of the 3,020 current clients, there are 14 who report a primary language other than English; 7 Spanish and 7 Arabic, only 1 that is reported as "Dutch". This would be .23% of our current service population for each language, English and Spanish. We currently do not serve any of these clients with transportation.

NEC Surveyed the Director of the Lagrange office, the former Lead Administrative Assistant and the current Lead Administrative Assistant (the Lead Admin staff perform the intakes on clients and gather all their demographic data) to determine the frequency in which we have Amish persons who are not fluent in English. All three concurred that all Amish client who access our facility are able to speak English very well. This population are generally born and raised in the area and grow up speaking a German/Dutch language in the home and with others within their community but attend Public school, learning English. We currently do not see a need to translate our documents in German.

Northeastern Center, Inc. assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. Northeastern Center Inc. provides approximately 7,695 passenger trips per year. The Center has not experienced any contacts with persons with speech limitations. If an individual has speech limitations, the driver will report the need to the Transportation Director, who will work with the Indiana Department of Transportation, if needed, to ensure the individual receives access to the transit services.

Most of the Spanish speaking persons served come from the Western portion of Noble County.

Factor 3: The nature and importance of the program, activity, or service provided by the program to people's lives.

All of Northeastern Center, Inc.'s programs are important; however, those related to safety, public transit, nondiscrimination and public involvement are among the most important. The Northeastern Center, Inc. is committed to providing meaningful access and will provide written translation for any of its documents, when reasonable, effective and with the available resources. In other cases, the Northeastern Center, Inc. will strive to provide alternative but meaningfully accessibility. Moreover, the Northeastern Center, Inc. continually evaluates its programs, services, and activities to ensure that persons who may be LEP are always provided with meaningful access. The Title VI policy, complaint form, and LEP policy are currently available in English and Spanish, but may be translated in other languages as needed.

Factor 4: The resources available for LEP outreach, as well as the costs associated with that outreach.

The Northeastern Center, Inc. makes every effort to make its programs, services, and activities, accessible to LEP individuals. The Northeastern Center, Inc. will use available resources, both internal and external to accommodate reasonable requests for translations.

Item # 2 – Description of how Language Assistance Services are Provided, by Language

The Northeastern Center, Inc. currently works with MARTTI for language services on an as needed basis. The center has identified, developed, and uses the following:

- a) My Language Guide will be available in each of the buses used by Northeastern Center to identify any specific language need.
- b) The Northeastern Center, Inc. has developed partnerships with MARTTI, Deaflink and other organizations to assist with LEP responsibilities.

Item # 3 – Description of how LEP Persons are Informed of the Availability of Language Assistance Service

In order to ensure that LEP individuals are aware of Northeastern Center, Inc.'s language assistance measures, Northeastern Center, Inc. provides the following:

- Title VI Program including the Language Assistance Plan is made available on website, posted in buses, and a hard copy in central office.
- Drivers and dispatchers are provided "My Language Guide" to identify language needs in order to match them with available services.

Item # 4 – Description of how the Language Assistance Plan is Monitored and Updated

Northeastern Center, Inc. will continue to update the LEP plan as required by U.S. DOT. At a minimum, the Title VI Plan will continue to be reviewed and updated every three (3) years in conjunction with the Title VI submission and use data from the U.S. Decennial Census or the American Community Survey as available, or when it is clear that the concentrations of LEP individuals are present in the Northeastern Center, Inc. service area.

Updates will continue to include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether Northeastern Center, Inc.'s financial resources are sufficient to fund language assistance resources needed.
- Determine whether Northeastern Center, Inc. has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning Northeastern Center, Inc.'s failure to meet the needs of LEP individuals.

Item # 5 - Description of how Employees are Trained to Provide Language Assistance to LEP Persons

The following training will continue to be provided to Northeastern Center, Inc. staff:

- Information on the Northeastern Center, Inc. Title VI Procedures and LEP responsibilities.
- Description of language assistance services.
- Use of "My Language Guide" used to identify language preference.
- Documentation of language assistance requests.
- Use of web-based interpreter services (over the phone interpretation provider) through MARTTI.
- How to handle a potential Title VI / LEP complaint.

Limited English Proficient (LEP) Resource Materials:

LEP Policy

Northeastern Center, Inc. shall provide for communication for limited English proficient riders to ensure them equal opportunity to benefit from services. Family members or friends of limited English proficient riders will not be used as translators unless specifically requested by that individual. Arrangements have been made with MARTTI & Deaflink to obtain translators. The agency will also utilize web-based translator programs if available.

***"I Speak"* Language Identification Card**

See attached My Language Guide from MARTTI (Language Access Network)

Log of LEP Encounters

Date	Time	Language Spoken By Individual <i>(if available)</i>	Name and Phone Number of Individual <i>(if available)</i>	Service Requested	Follow Up Required	Staff Member Providing Assistance	Notes

Section 9: Minority Representation Information

Northeastern Center, INC does not have a transit-related board, committee or council.

Section 10: Providing Assistance to and Monitoring Subrecipients

1. Does agency provide funding to subrecipients?

No, the agency does not have subrecipients.

Yes. If yes, list the subrecipient names: (list other agency names here)

Section 11: Title VI Equity Analysis for Facility Acquisition

Title 49 CFR, Appendix C, Section (3)(iv) requires “the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin.” For purposes of this requirement, “facilities” does not include bus shelters, as they are considered transit amenities. It also does not include transit stations, power substations, or any other project evaluated by the National Environmental Policy Act (NEPA) process. Facilities included in the provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. Has the agency built a facility? (check a response below)

No, the agency has not built a facility.

Yes, the agency has built a facility and completed a Title VI equity analysis to compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site. (Include at the end of the Title VI plan a copy of the Title VI equity analysis.)

Section 12: Fixed Route Transit Providers Service Standards and Policies

FTA Circular 4702.1B, Chapter III, Paragraph 10: All fixed route transit providers shall set service standards and policies for each specific fixed route mode of service they provide.

Northeastern Center, Inc.:

is a fixed route transit provider

is **not** a fixed route transit provider

U.S. Census Bureau Statistics – 5 year Estimate

	DeKalb County, Indiana		LaGrange County, Indiana		Noble County, Indiana		Steuben County, Indiana	
Label	Estimate	% Of Population	Estimate	% Of Population	Estimate	% Of Population	Estimate	% Of Population
Total:	40,303		36,483		44,260		32,550	
Speak only English	39,003	96.77%	19,776	53.76%	38,002	85.86%	31,700	97.39%
Spanish:	456	1.13%	1,158	3.15%	3,687	8.33%	578	1.78%
Speak English "very well"	350	0.87%	716	1.95%	2,182	4.93%	415	1.27%
Speak English less than "very well"	106	0.26%	442	1.20%	1,505	3.40%	163	0.50%
French, Haitian, or Cajun:	13	0.03%	5	0.01%	32	0.07%	20	0.06%
Speak English "very well"	13	0.03%	3	0.01%	24	0.05%	14	0.04%
Speak English less than "very well"	0	0.00%	2	0.01%	8	0.02%	6	0.02%
German or other West Germanic languages:	545	1.35%	15,293	41.58%	1,630	3.68%	124	0.38%
Speak English "very well"	490	1.22%	10,823	29.42%	1,182	2.67%	115	0.35%
Speak English less than "very well"	55	0.14%	4,470	12.15%	448	1.01%	9	0.03%
Russian, Polish, or other Slavic languages:	0	0.00%	17	0.05%	5	0.01%	36	0.11%
Speak English "very well"	0	0.00%	0	0.00%	5	0.01%	36	0.11%

	DeKalb County, Indiana		LaGrange County, Indiana		Noble County, Indiana		Steuben County, Indiana	
Speak English less than "very well"	0	0.00%	17	0.05%	0	0.00%	0	0.00%
Other Indo-European languages:	54	0.13%	45	0.12%	20	0.05%	5	0.02%
Speak English "very well"	54	0.13%	37	0.10%	20	0.05%	5	0.02%
Speak English less than "very well"	0	0.00%	8	0.02%	0	0.00%	0	0.00%
Korean:	25	0.06%	9	0.02%	0	0.00%	0	0.00%
Speak English "very well"	25	0.06%	9	0.02%	0	0.00%	0	0.00%
Speak English less than "very well"	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Chinese (incl. Mandarin, Cantonese):	8	0.02%	0	0.00%	7	0.02%	0	0.00%
Speak English "very well"	8	0.02%	0	0.00%	7	0.02%	0	0.00%
Speak English less than "very well"	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Vietnamese:	1	0.00%	0	0.00%	194	0.44%	10	0.03%
Speak English "very well"	1	0.00%	0	0.00%	0	0.00%	0	0.00%
Speak English less than "very well"	0	0.00%	0	0.00%	194	0.44%	10	0.03%
Tagalog (incl. Filipino):	45	0.11%	0	0.00%	24	0.05%	31	0.10%
Speak English "very well"	22	0.05%	0	0.00%	24	0.05%	31	0.10%

	DeKalb County, Indiana		LaGrange County, Indiana		Noble County, Indiana		Steuben County, Indiana	
Speak English less than "very well"	23	0.06%	0	0.00%	0	0.00%	0	0.00%
Other Asian and Pacific Island languages:	35	0.09%	0	0.00%	17	0.04%	30	0.09%
Speak English "very well"	21	0.05%	0	0.00%	16	0.04%	4	0.01%
Speak English less than "very well"	14	0.03%	0	0.00%	1	0.00%	26	0.08%
Arabic:	44	0.11%	178	0.48%	621	1.40%	0	0.00%
Speak English "very well"	15	0.04%	78	0.21%	394	0.89%	0	0.00%
Speak English less than "very well"	29	0.07%	100	0.27%	227	0.51%	0	0.00%
Other and unspecified languages:	74	0.18%	2	0.01%	21	0.05%	16	0.05%
Speak English "very well"	74	0.18%	0	0.00%	7	0.02%	16	0.05%
Speak English less than "very well"	0	0.00%	2	0.01%	14	0.03%	0	0.00%