



TITLE VI
CIVIL RIGHTS PROGRAM UPDATE

Submission Date: 04/07/2022

Submitted in Accordance to Federal Transit Administration
Circular 4702.1B

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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 that provides financial assistance for any program or activity is authorized and directed by the Department of Justice (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 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 in 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 supported program is to provide employment or those employment practices would result in discrimination against beneficiaries of FTA-assisted services and benefits.

The purpose of GPTC's Title VI program, reflecting those of the Federal Transit Administration, is to:

1. Ensure that the level and quality of public transportation service is provided in a nondiscriminatory manner;
2. Promote full and fair participation in public transit decision-making without regard to race, color or national origin; and
3. Ensure meaningful access to transit-related programs and activities by persons with limited English proficiency.

REQUIREMENTS

All programs administered by the Federal Transit Administration are subject to Title VI of the Civil Rights Act of 1964, and the implementing regulations issued by the Department of Justice (28 CFR Part 42, Subpart F) and the Department of Transportation (49 CFR Part 21).

The Gary Public Transportation Corporation (GPTC) is a recipient of Federal Transit Administration assistance and shall comply with the Title VI requirements as outlined in Circular 4702.1B. The Federal Transit Administration has established two main categories of reporting requirements - General and Program-Specific. GPTC is subjected to both of the main categories of reporting requirements because:

- (1) General reporting requirements are the same for all recipients regardless of the type or level of assistance received; and
- (2) GPTC is a public transit provider which provides transit services primarily in the City of Gary and the urbanized area of Northeastern Illinois/Northwestern Indiana (which has a population over 200,000) and receives capital and planning assistance under the Federal Aid Urban System Program.

Because GPTC is a public transit provider which operates less than fifty vehicles in peak service in an urbanized area, the corporation is not required to provide demographic, monitoring or analytical information. GPTC is providing some system descriptions, maps and a summary of analytical information in this document for informative purposes.

ABOUT THE BOARD OF DIRECTORS

The Federal Transit Administration's Circular 4702.1B requires any recipient-selected boards, advisory councils or committees to be described in a table that includes a racial breakdown and efforts to encourage minority participation.

The Gary Public Transportation Corporation Board of Directors is externally selected. It is currently governed by a seven-member board as stipulated by state enabling legislation. The Office of the Mayor selects three members of the Board (two Democrats and one Republican), and the Gary Common Council selects four members (two Democrats and two Republicans).

PUBLIC NOTICE OF TITLE VI RIGHTS, COMPLAINT PROCESS

Pursuant to FTA Circular 4702.1B, the Gary Public Transportation Corporation (GPTC) is required to post a notice that GPTC is compliant with Title VI, and inform the public of its Title VI rights and how to file a complaint against GPTC if a member of the public feels the need to do so.

The following is posted on all GPTC vehicles, the main lobby of GPTC's offices at the Adam Benjamin Metro Center, and on GPTC's website at www.gptcbus.com:

"The Gary Public Transportation Corporation (GPTC) is committed to ensuring that no person is excluded from participation in, or denied the benefits of its services on the basis of race, color or national origin as protected by the Civil Rights Act of 1964, as amended ("Title VI"). For more information or if you believe that you have been subjected to discrimination under Title VI, you may file a written complaint with GPTC as follows:

*Gary Public Transportation Corporation
Attention: Title VI Officer
Adam Benjamin Metro Center
100 w. 4th Avenue, 3rd Floor
Gary, IN 46402*

Si necesita información adicional en Español llamada (219) 885-7555"

A copy of the notice, as well as the complaint procedure (codified at GPTC in a Standard Operating Procedure), is provided in [Appendix A](#) of this Title VI Program.

LAWSUITS AND COMPLAINTS RELATED TO TITLE VI

Currently, there are no lawsuits or complaints levied against the Gary Public Transportation Corporation (GPTC) related to its Title VI program. None have been opened or received since the approval of GPTC's last Title VI Program.

PUBLIC PARTICIPATION PLAN

The Gary Public Transportation Corporation's Public Participation Plan describes the organization's outreach efforts as well as opportunities for public input. It details the types of outreach developed by the organization and provides examples of recent efforts. It is attached herein as [Appendix B](#).

GPTC also, as a planning partner with its Metropolitan Planning Organization (MPO), the Northwestern Indiana Regional Planning Commission (NIRPC), uses NIRPC's Public Participation Plan as its own plan in the implementation of transit programs, federal funding projects and programs. This Public Participation Plan was approved by NIRPC on December 11, 2014. A revision is currently under public review.

In addition, GPTC will also require a public hearing for the following:

1. GPTC's Annual Budget
2. Major service changes, defined as permanent changes (longer than three months) that will result in a 50% decrease in service on affected lines
Service change presentations shall include equity analysis determinations
3. Fare increases

These hearings are to be advertised in at least one daily newspaper and at least one weekly newspaper. A notice of hearings for service changes are also posted on vehicles and on GPTC's website. An invitation to request services for the deaf are required to be included in these notices.

LIMITED ENGLISH PROFICIENCY (LEP) PLAN

The Gary Public Transportation Corporation's LEP plan is included as [Appendix C](#) of this Title VI Program.

EQUITY ANALYSES FOR CONSTRUCTION OF FACILITIES

Since the previous Title VI Plan, GPTC also has not constructed any new facilities that would warrant an equity analysis.

SYSTEM DESCRIPTION AND SERVICE STANDARDS

Though the Gary Public Transportation Corporation was born as a municipal corporation in 1974, its history as a private transportation service stretches to the first decade of the twentieth century.

The Gary & Interurban Railway Company operated streetcars starting in 1908, two years after the



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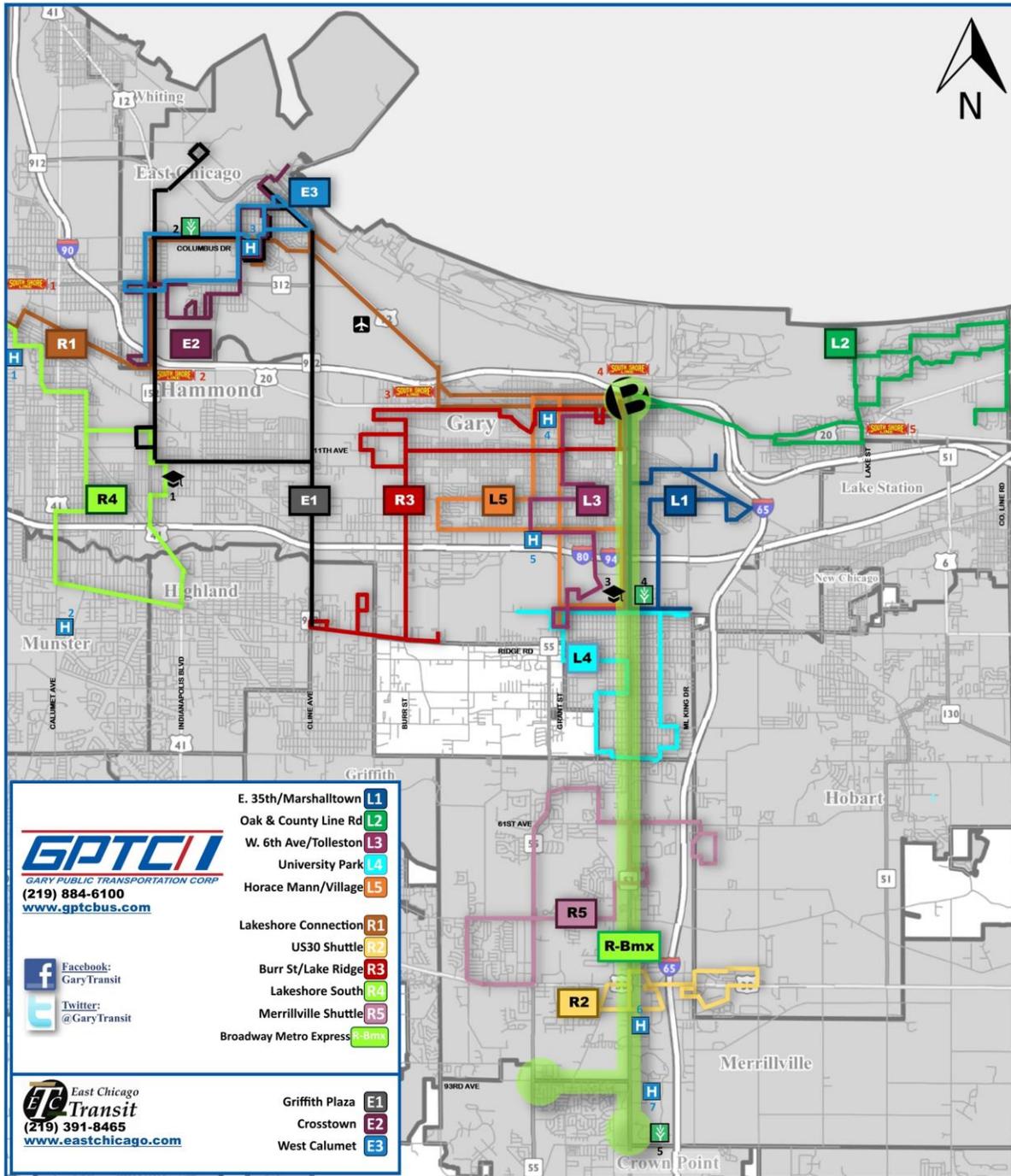
incorporation of the City of Gary. By 1920 there were streetcar lines, under the control of a myriad of rail companies, connecting downtown Gary and the city's lakefront steel mills to newly annexed areas such as Tolleston and Glen Park. Transit systems also connected the city to suburbs such as Crown Point, Hobart and Valparaiso. Throughout the 1930s and 1940s many of these lines were abandoned and replaced with bus service.

By the mid-1950s most of these lines, both within city limits as well as in the surrounding communities, were operated by Gary Railways, Inc. Gary Railways split into separate city (Gary-only) and suburban companies in 1956. Gary Intercity

Lines – the suburban system – operated until 1971, when all bus service outside of Gary was discontinued. The city bus service – Gary Transit – operated until 1975 and then became the public company now known as the Gary Public Transportation Corporation. Many of the routes currently run by GPTC are bus versions of the streetcar lines created during the first years of Gary's existence.

In 1996 GPTC began providing service outside of the corporate limits of the City of Gary, beginning with service to Hammond and East Chicago, in cooperation with those communities' transit agencies. Currently, GPTC currently operates local fixed route lines in Gary as well as regional routes serving nine other communities in Northwest Indiana: Calumet Township, Crown Point, East Chicago, Griffith, Hammond, Highland, Hobart, Merrillville and Munster. The map on the following page provides a snapshot of our current service area. This map shows GPTC's routes – Metro Express, regional and local – as well as routes from East Chicago Transit. It also identifies important transit connections, schools and hospitals.





GPTC's current system consists of fixed routes providing three types of services:

1. Metro Express service: GPTC's premium tier of service includes routes with much higher frequency (usually less than 30 minutes) that operate as limited-stop service, focusing substantial bus stop improvements at the stops identified.
2. Regional service: These are routes that wholly, or in part, serve communities outside of Gary City Limits.
 - a. Regional with unlimited service: These regional services, like local and circulator services are designed to serve most street corners and designated stops.
 - b. Regional with express service: Express service has limited stops, usually at transfer points and major generators. Express service is applied for areas outside of the City on routes in which more than 40% of the service miles are outside of City limits.
 - c. Rapid Bus: Express bus service on high-ridership corridors, with limited stops but with higher frequency and higher visibility stations, possibly incorporating specialized lanes and other traffic control features.
3. Local service: These are routes that serve multiple neighborhoods and/or the Adam Benjamin Metro Center, and whose service is wholly contained within the City of Gary
4. Circulator (shuttle) service: These are routes that do not serve major corridors (minor arterial roads and above), do not serve the Metro Center, and serve to primarily feed major routes with service to adjacent neighborhoods. Because circulators are independent of corporate boundaries, these services can be local OR regional service by nature.

GPTC's service policies and standards are developed according to these service types.

Fare Policy

The Gary Public Transportation Corporation's fare policy was designed to remove subjectivity and provide uniformity to the assignment of fares to various routes. The policy itself was approved by GPTC's Board of Directors on July 7, 2011, and assigns fares based on Board action and service type:

1. Local service: For local service, GPTC's current local rates, as set by the Board, will apply.
2. Regional unlimited service: In areas served by unlimited regional service, local fares will apply. This includes service outside of City limits for routes in which less than 40% of service mileage is outside of City limits
3. Regional express service (including Metro Express): Any portion of a route with express (limited stop) service shall be subject to a regional, premium fare, as set by the Board of Directors. This includes limited stops, if designated, within the City of Gary.
4. Circulator (shuttle) service: Though these routes may, in some instances, operate wholly outside of City limits, these services are defined as having unlimited stops. Because of this, local rates will apply, as set by the Board of Directors.

Vehicle Headway Assignment/Policy

The Gary Public Transportation Corporation strives to provide service meeting the needs of GPTC's customers based on demand. To attain the proper levels of service, GPTC has created service standards that are described in the table below.

GPTC's goal is to provide a minimum hourly service on all of its lines, regardless of type. GPTC's data showed that some lines in the Broadway system average a passenger load at capacity. GPTC's Livable Broadway Regional Plan recommended creation of a Rapid Bus type of service to meet this current

demand as well as future considerations, based on development patterns, either by adding frequency and/or stops or adjusting the type of service.

In addition, GPTC’s data indicates that other lines are averaging ridership that may require peak frequency re-assessment as well.

GPTC’s Lakeshore Connection line (Route R1) has a 120-minute headway currently as a result of financial constraints, but its desired peak frequency is 60 minutes; GPTC has noted significant ridership fluctuations with service levels on the “Lakeshore Network” routes (R1 and R4), the latter of which had a temporary service reduction and rebounded with even higher ridership when service levels were re-established.

Similar to the Lakeshore Network routes, GPTC has worked with other agencies to create a significant subset of routes that complement the new Broadway Metro Express Rapid Bus service. Currently, the Bmx operates in Gary, Merrillville and Crown Point and is fed by two circulator routes – the University Park (L4) and US30 (R2) Shuttles.

Service Type	Target Peak Frequency	Base Frequency	Saturday Frequency
Metro Express	<30	30	30-60
Regional	60	60	60
Local	60	60	60
Circulator	60*	60	60

On-Time Performance Policy

The Gary Public Transportation Corporation has maintained a policy that requires route review for any service that is unable to achieve a 95% on-time rate. This review could lead to additional training/personnel considerations, route restructuring or headway reduction (if a chief concern is passenger load).

Service Availability Policy

The Gary Public Transportation Corporation has maintained a policy of maximum access within the Gary corporate limits. Specifically, GPTC’s goal has been to provide service coverage accessible within ½ mile of 95% of Gary’s residents, and ¼ mile for 80% of Gary’s residents.

Outside of corporate boundaries, GPTC has no strict policy as its route coverage is a matter of non-municipal funding and community involvement.

Vehicle Load Standards/Assignment Policy

The Gary Public Transportation Corporation operates three sizes of full-size buses and one type of body-on-chassis van in fixed-route service. Load factors for each are as follows.

Vehicle Type	Seated Capacity	Standing Capacity	Total	Maximum Load Factor
BOC Van	13	2	15	1.2
35’ Bus	27	7	34	1.3
40’ Bus	33	10	43	1.3

From these vehicle types, assignments take into consideration the following factors:

1. Route passenger load
GPTC's 40' vehicles are primarily assigned to GPTC's regional, non-shuttle routes, including Metro Express. These routes, on average, carry the largest number of passengers and have larger service areas. All of these routes serve a Central Business District and connect to local feeder routes, providing non-discriminatory access to these larger vehicles.

GPTC's 35' vehicles are made available for all fixed route services.

2. Size/turning radii limitations
GPTC's BOC vehicles are primarily assigned to shuttle services. These services frequently access local neighborhood streets and/or shopping centers, requiring smaller vehicles. The need for larger vehicle assignment for these routes is triggered by passenger load fluctuations.
3. Vehicle age
Vehicles at or beyond their useful life are assigned to GPTC's spare fleet to avoid the use of any substandard equipment in regular service. When older vehicles are assigned, they are not limited to geographic areas or based on demographic patterns. However, because of the larger service areas of GPTC's regional routes, care is taken to avoid assignment of older vehicles on these lines to avoid the need to provide a road call to a vehicle located far from GPTC's maintenance facility. Such a road call would increase the chances of a missed trip, creating a domino effect that would lead to late/missed transfer connections throughout the route network.
4. Vehicle Amenities
All vehicles, regardless of age, should have working air conditioning, heat and lift equipment. Rather than assign these vehicles to particular routes, vehicles without these amenities are considered in need of maintenance and care is taken to avoid the need to provide service with those conditions.

Transit Amenities

The Gary Public Transportation Corporation assigns transit amenities – bus shelters and benches – based on the type of stop and the activity at the stop. GPTC will consider transit amenities for any stop that experiences over 50 boardings per day. In addition, stops that are at transfer points between local and regional routes will also receive priority consideration for amenities. Other considerations that affect the priority of stops include:

1. Location near an activity center or business district
2. Funding partnership with other agencies or organizations
3. Neighborhood improvement considerations in low-income/blighted/redevelopment areas

GPTC currently has federal funds for shelter replacement and has been actively pursuing local funding to launch a replacement program. High-activity and high-visibility transfer locations and the Metro Center have and will be the focus of individual projects for specialized facilities.

APPENDIX A

TITLE VI NOTICE, COMPLAINT PROCESS

YOUR RIGHTS

The Gary Public Transportation Corporation (GPTC) is committed to ensuring that no person is excluded from participation in, or denied the benefits of its services on the basis of race, color or national origin as protected by the Civil Rights Act of 1964, as amended (“Title VI”). For more information or if you believe that you have been subjected to discrimination under Title VI, you may file a written complaint with GPTC as follows:

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Gary, IN 46402

Si necesita información adicional en Español
llamada (219) 885-7555

March 15, 2021



(219) 884-6100

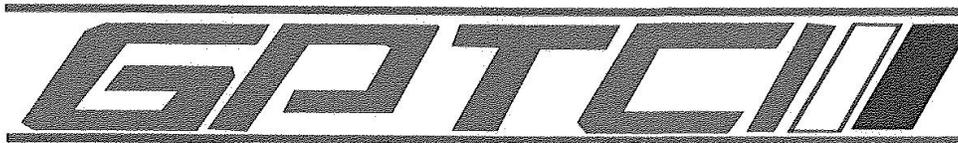
www.gptcbus.com



Facebook Keyword:
GPTC

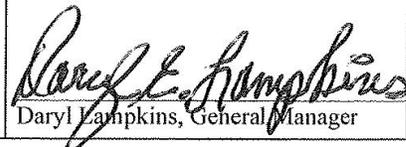


Twitter Feed:
@GaryTransit



GARY PUBLIC TRANSPORTATION CORP

100 West 4th Avenue
 Gary, Indiana 46402
 2101 West 35th Avenue
 Gary, Indiana 46408

Standard Operating Procedure		Procedure No: GPTC/PM-05	Page: Page 1 of 2
TITLE VI COMPLAINT PROCEDURE AND REVIEW		Supersedes: None	Rev. None
Issuing Department Planning & Marketing  David Wright, Director	Approval:  Daryl Lampkins, General Manager	Previous Rev. Date: None	Current Date: 7/31/09
<p><u>Table of Contents</u></p> <p>1.0 PURPOSE AND PROCEDURE</p> <p>2.0 PROCEDURAL OBJECTIVE</p> <p>3.0 SCOPE OF APPLICATION</p> <p>4.0 DEFINITIONS</p> <p>5.0 METHOD PROCESS</p> <p>6.0 ROLES AND RESPONSIBILITIES</p> <p>7.0 RELATED DOCUMENTATION</p> <p>8.0 RECORDS</p>			
<p>1.0 <u>PURPOSE OF PROCEDURE</u></p> <p>Title VI complaints must be reviewed and assessed, per federal guidelines.</p>			
<p>2.0 <u>PROCEDURAL OBJECTIVE</u></p> <p>To define the process for the review and assessment of complaints that cite Title VI of the Civil Rights Act of 1964.</p>			
<p>3.0 <u>SCOPE OF APPLICATION</u></p> <p>This procedure is defined for the review of Title VI complaints.</p>			
<p>4.0 <u>DEFINITIONS</u></p> <p>“Title VI” refers to Title VI of the Civil Rights Act of 1964, as amended. This section of the Civil Rights Act defines rights and responsibilities of riders and transit systems, respectively, in reference to discrimination.</p> <p>“Title VI Officer” refers to the GPTC employee who has been designated as the person to oversee the Title VI program. Currently, the Title VI Officer is the Director of Planning and Marketing.</p> <p>GPTC’s “Title VI Policy” refers to a document that describes GPTC’s policies, with specifics for</p>			

route review and route coverage in light of Title VI.
The “Excluded Party” refers to the person who is submitting a complaint of a violation of GPTC’s Title VI policy.

5.0 METHOD (PROCESS)

1. The Excluded Party files a written complaint to the Title VI Officer at GPTC. This complaint shall include contact information for the Excluded Party – at minimum, a mailing address must be included.
2. The Title VI Officer reviews complaint and identifies the violated section of the Title VI policy, if any.
3. If violations took place, the Title VI Officer proposes mitigation actions to address the violation. This proposal may include immediate remedies and long-term changes to prevent future occurrences.
4. The Title VI Officer contacts the Excluded Party in writing within 30 days of complaint filing with the results of the review of complaint, and identification of violations.
5. If desired, the Excluded Party appeals the response from the Title VI Officer. This appeal, in writing, is sent to the General Manager of GPTC.
6. If an appeal is requested then within 30 days, the General Manager reviews the complaint, the Title VI Officer’s response and results, and responds with a final determination of GPTC actions.

6.0 ROLES AND RESPONSIBILITIES

1. The Title VI Officer has the responsibility of reviewing Title VI Policies in light of a complaint.
2. The General Manager, if an appeal is filed, has the responsibility of reviewing policy and all previous communication in making a final determination.

7.0 RELATED DOCUMENTATION

GPTC Title VI Policy

8.0 RECORDS

The Title VI Officer maintains and controls electronic and/or hard copies of all source and summary information.

APPENDIX B

GPTC PUBLIC PARTICIPATION

PLAN

PUBLIC PARTICIPATION PLAN

GARY PUBLIC TRANSPORTATION CORPORATION
APRIL 2022



Facebook Keyword:
GPTC



Twitter Feed:
[@GaryTransit](#)

PURPOSE AND POLICY

Public information, public access, and public dialogue are key elements in the decision-making process at the Gary Public Transportation Corporation. This Public Participation Plan provides insight on GPTC's outreach, methodology and requirements for providing and receiving information to and from the communities served by GPTC. In this document are methods and procedures that encourage, facilitate and monitor participation in GPTC's decisions, by those interested in public transportation. In addition, methods, opportunities and procedures are described that promote dialogue by informing the public as well as allowing the public to inform GPTC.

STAKEHOLDERS

Riders: These include riders using GPTC's fixed-route and complementary paratransit service. These stakeholders are informed via direct means – notices on vehicles, at transit stations and, in some cases, direct mailings.

Limited English Populations (LEPs): GPTC has developed a separate plan for outreach to LEP groups.

Minority Populations: GPTC reaches out to minority groups via all measures of outreach – physical and electronic. Additional measures include outreach to community organizations at the grassroots level.

The Disabled Community: GPTC maintains a relationship with the disabled community of riders, potential riders, and advocacy groups. Maintaining strong communication includes direct alerts and front-end input from advocacy groups on service planning, outreach efforts and key projects such as transit stations.

The Elderly: For major service and fare changes, GPTC provides information to senior residential developments served by GPTC's fixed route and complementary paratransit services.

Community Organizations: GPTC maintains a database of community organizations for the purpose of providing information directly – via mail or electronic communication – for major changes to GPTC's system and/or infrastructure.

Neighbors and Affected Public: for projects such as new routes and infrastructure improvements, GPTC engages with neighboring residential, commercial and institutional interests that could potentially be impacted.

Transportation Partners: In the case of significant service changes that could impact connections to other transportation providers, GPTC engages in joint planning and outreach to maximize public awareness and minimize disruption.

OUTREACH AND ENGAGEMENT METHODS

Current technology requires GPTC to provide outreach and notice in conventional and non-conventional ways. These methods reach different portions of the public with similar information so that awareness is maximized regardless of age, race/ethnicity, language and income levels.

Physical: For public hearings, GPTC provides notices on revenue vehicles as well as key stops and stations, in particular the Adam Benjamin Metro Center in downtown Gary. On certain occasions, flyers are distributed to residential – in particular, senior – communities, retail establishments and seat drops on vehicles.

Electronic: GPTC provides notice of hearings on the main page and in printable formats on www.gptcbus.com.

Traditional Media: GPTC uses print media for the publication of meeting notices and public hearing notices. In special cases, GPTC uses these avenues for announcements of importance via press releases.

Social Media: GPTC has an active twitter feed, (@GaryTransit), an active Facebook page (Gary Transit), an active Instagram feed (Gary Transit) and a LinkedIn page (GPTC). These are used for two-way multimedia information, providing GPTC an informal outreach tool for meeting notification, news, public service announcements, promotions and service alerts, while availing riders and the public with easy access to the corporation for service questions and other information.

Broadcast Media: GPTC invites partnerships with broadcast media for key service changes that meet the public hearing threshold, as well as noteworthy occurrences.

GPTC Signage Inventory: For major service changes, promotions and major events, GPTC utilizes interior and exterior signage areas to provide notice to the public in a high-profile manner.

Stakeholder Engagement: GPTC maintains a regular dialogue with several identified stakeholder groups. These include organizations that promote accessibility, environmental justice, nontraditional transportation, public housing residents, and public transportation advocacy.

REGULAR OPPORTUNITIES FOR PUBLIC PARTICIPATION

GPTC provides opportunities for public input on a regular basis. This includes the provision of public comment at the end of regularly-scheduled meetings of the GPTC Board of Directors. GPTC's Board meets the first Thursday of each calendar month. In addition to monthly public comment opportunities, specific opportunities for comment are afforded for:

- GPTC's Annual Capital Budget, presented to the Board during the first quarter of each calendar year
- GPTC's Procurement Plan, presented to the Board during the first quarter of each calendar year
- GPTC's annual budget

These meetings are advertised in local newspapers, on GPTC's website (www.gptcbus.com), and the agenda is posted at GPTC's corporate offices at least 48 hours prior to each meeting.

GPTC also requires public hearings for the following:

- GPTC's Annual Budget
- Service changes that will result in a permanent decrease in service on the affected line over 50% (does not include emergency suspensions in service under four months)
Service change presentations shall include equity analysis determinations
- Fare increases

These public hearings are advertised in local newspapers at least 30 days in advance. Notices are also placed on GPTC vehicles and on GPTC's website. Information is also released via twitter and Facebook, and key stakeholder groups are alerted directly by mail or electronic communication.

DOCUMENTATION OF PUBLIC COMMENT AND RESPONSES

GPTC shall document comments received during the course of the public input process. GPTC shall also document how staff and GPTC's Board responded to the public comments.

Documentation of comments may be accomplished in a manner appropriate to the project and the nature of the comments, and may consist of minutes of public forums, hearings or meetings, files of letters, emails, transcripts, PowerPoint presentations, and/or a special memo that summarizes the comments. Recordings and transcripts of the major points of public meetings will be made written record, and a written summary of comments and responses shall be prepared to provide the feedback to the public if requested. Comments for fare increases and service changes shall be part of the written record for the public hearings and/or Board meetings at which action is anticipated, and responses to comments shall either be provided at these meetings or in a timely fashion afterward. A summary analysis and report on disposition of comments may be made a part of the final plan. Rationale for policy decisions will be available to the public in writing, if requested.

RECENT OUTREACH EFFORTS

Travel and health restrictions as a result of the global COVID-19 pandemic greatly reduced the opportunity and safety of public meetings. This impacted outreach opportunities.

April 2019: GPTC participated in the national observation of Get on Board Day, billing it as “a day to highlight the benefits of public transit” and “to show your appreciation to bus operators, or sample transit to see if it can work for your commute.” Staff participated at Gary's Metro Center, Indiana University/Ivy Tech, guided rides on the Broadway Metro Express, and a hashtagged social media campaign.

November 2021: GPTC conducted a “Fall Summit”, marking the first in-person public outreach effort since winter 2020. This event was an opportunity to discuss planned projects, current service, and field questions regarding everything related to the system.

APPENDIX C

GPTC LEP ACTION PLAN

**GARY PUBLIC
TRANSPORTATION
CORPORATION
LIMITED ENGLISH PROFICIENCY
(LEP) ACTION PLAN**

PREPARED BY GPTC PLANNING AND MARKETING DEPARTMENT, APRIL 2014; UPDATED MARCH 2022

INTRODUCTION

The Gary Public Transportation Corporation's LEP Action Plan is the script that GPTC will use to facilitate appropriate outreach and availability of information to riders and potential riders, who have limited English proficiency (LEP). The plan identifies the analysis factors, and outlines measures that GPTC will take for outreach, and to eliminate deficiencies in access to information and services.

Development of the LEP Action Plan is a requirement of Title VI of the Civil Rights Act of 1964. Our Title VI policy states:

The Gary Public Transportation Corporation (GPTC) is committed to ensuring that no person is excluded from participation in, or denied the benefits of its services on the basis of race, color or national origin as protected by the Civil Rights Act of 1964, as amended ("Title VI").

In order to comply with Title VI, agencies are encouraged to take reasonable actions for competent language assistance, and examine its services to develop and implement a system by which LEP persons can meaningfully access said services.

REQUIREMENTS

Recipients of federal transportation funds are required to make the above efforts, including:

- A: Conducting the "Four-Factor Analysis,"
- B: Developing a Language Access Plan,
- C: Providing appropriate language assistance, and
- D: Abiding by the Safe Harbor Provision

FOUR FACTOR ANALYSIS

The Gary Public Transportation Corporation, in accordance with the United States Department of Transportation's *Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficiency (LEP) Persons*, examined the following four areas to gauge assessment and access for LEP individuals

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity or service

Though GPTC serves the City of Gary primarily, its fixed route and demand-response services extend to five other communities in Lake County, IN. Additionally, GPTC's plans include examination of service viability in additional communities in Lake County. Accordingly, GPTC examined racial/ethnicity and language demographics in the entirety of Lake County, IN. The information used is from the 2010 Census.

Out of a total population of 496,005, the population breakdown is as follows:

Total Population	496,005	100%
White alone	329,031	66.3%
African American alone	133,434	26.9%
Hispanic or Latino (of any race)	82,663	16.7%
Asian alone	7,952	1.6%
American Indian alone	4,217	0.9%
Some other race alone	33,488	6.8%
Hawaiian/Pacific Islander alone	408	0.1%

The significant Hispanic breakdown:

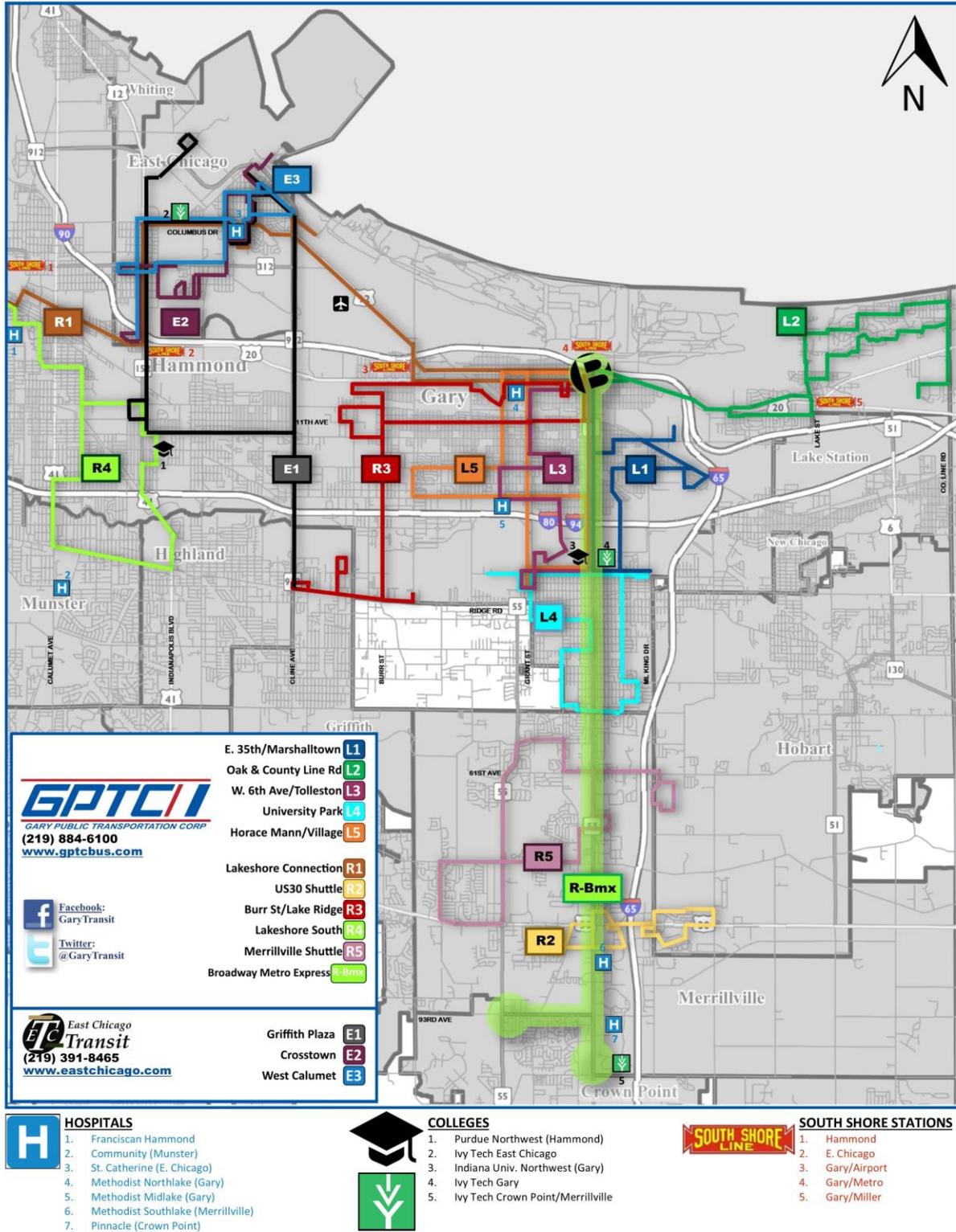
Hispanic or Latino (of any race)	82,663	100%
Mexican	64,912	78.5%
Puerto Rican	11,991	14.5%
Cuban	467	0.53%
Other Hispanic or Latino	5,293	6.4%

As can be seen from this Census information, GPTC has the potential to serve a significant LEP population.

Factor 2: The frequency with which LEP individuals come in contact with the program

The Gary Public Transportation Corporation carries, or has the potential to carry, a significant amount of LEP individuals. Of the 496,031 residents of Lake County, approximately 300,000 of them reside in the communities currently served by GPTC. Most of these residents are in Gary. Additional communities served are Calumet Township, Crown Point, East Chicago, Griffith, Hammond, Highland, Hobart, Merrillville and Munster. As the majority of passengers on GPTC travel to and from work, the fact that 60% of the residents of the county have reasonable access to GPTC’s service constitutes a significant potential contact level with LEP individuals.

COMMUNITIES SERVED BY GPTC



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

Access to public transportation in an urban setting is vital, because of concentrations of poverty and the lack of centralized employment that describes the current state of Lake County. The DOT’s LEP guidance states that “providing public transportation access to LEP persons is crucial. An LEP person’s inability to utilize effectively public transportation may adversely affect his or her ability to obtain health care, education or access to employment. Because of GPTC’s service to important employment areas, including the suburban Highway 30 corridor, and its access to four hospitals and countless other medical facilities, GPTC’s services must be considered vital for LEP individuals and all residents of Lake County.

Factor 4: The resources available and costs to the recipient

Current GPTC resources for LEP individuals include signs in English and Spanish, as well as office and transportation staff that are fluent in Spanish. Staff training is also offered for customer service, including services to disabled and LEP communities.

LANGUAGE ASSISTANCE MEASURES

An assessment of the current resources available (Factor 4) indicates a deficiency. To alleviate this, GPTC’s goal of full access to its services include the following objectives:

1. Written materials
Though several notices and materials feature bilingual information, this does not include all information. The GPTC, in redesigning its electronic and written schedule information (including Americans with Disabilities Act materials), will prominently broadcast the availability of LEP assistance and will provide key information in Spanish as well as English.
2. Front-line staff training
The management of GPTC will fully identify multilingual staff, and identify a program to train its transportation staff (bus drivers, supervisors, dispatchers and managers), as well as other staff (receptionists) on identifying some key words in Spanish (and, if necessary, other languages), and directing them to GPTC’s resources and/or personnel who can assist them in getting information they need in order to utilize GPTC’s services. This may include providing information to centralized information and call centers formed under the guidance of the Northwest Indiana Regional Bus Authority (RBA).
3. Notice of LEP plan, and updates
The GPTC LEP Action Plan will be featured on GPTC’s website and will be available at both office facilities. All front-line staff will be made aware of its availability, in order to direct those interested in reviewing GPTC’s plan.

4. Updates and monitoring

As objectives are achieved, status will be amended into this Action Plan and, where necessary, noted on GPTC's website. The Action Plan will be reviewed annually.

SAFE HARBOR PROVISION

Transit providers are required to provide versions of vital written documents for any LEP population that constitutes 5% or 1,000 persons, whichever is less. Based on this definition, GPTC would be required to provide vital documents in Spanish. The above Language Assistance Measures thus satisfy the Safe Harbor Provision.

GPTC has identified several documents that are vital for translation under the Safe Harbor provision:

1. GPTC ROUTE SCHEDULES
2. GPTC FARE SHEET
3. GPTC PUBLIC PARTICIPATION PLAN

GPTC will be procuring a firm for translation and printing, with the goal of completing the translation, at minimum, of these vital documents by the end of 2023.

GPTC TITLE VI COMPLAINT FORM

NAME _____
ADDRESS _____
BEST PHONE NUMBER TO REACH YOU _____
EMAIL ADDRESS _____

TYPE OF DISCRIMINATION: RACE COLOR NATIONAL ORIGIN

DATE OF INCIDENT: _____

EXPLANATION OF INCIDENT. Answer questions such as: what happened? Why do you feel you were discriminated against? Who was involved (If this was on a bus, please state the route and time of day)? Were there witnesses?

HAS A COMPLAINT ABOUT THIS INCIDENT BEEN FILED WITH ANOTHER AGENCY?

YES NO

IF SO, WITH WHAT AGENCY OR AGENCIES? _____

PROVIDE A NAME AND CONTACT NUMBER FOR ANOTHER AGENCY FOR THIS COMPLAINT.

HAVE YOU FILED A COMPLAINT IN THE PAST? YES NO

IF SO, WITH WHAT AGENCY? GPTC _____ OTHER (SPECIFY) _____

PLEASE ATTACH ANY OTHER INFORMATION OR MATERIALS YOU THINK ARE RELEVANT TO YOUR COMPLAINT.

YOU ARE REQUIRED TO SIGN AND DATE YOUR COMPLAINT. PLEASE DO SO BELOW.

SIGNATURE: _____ DATE: _____

15-Mar-21

[INSERT JUNE BOARD MEETING PACKET COVER AGENDA]

[INSERT JUNE BOARD MEETING MINUTES]

[INSERT PUBLIC NOTICE PROOF OF PUBLICATION]