

**Federal Transit Administration
Title VI Program
The Arc of Wabash County**

April 19, 2023

Title VI Plan Table of Contents

The **Insert Agency Name** Title VI plan includes the following elements:

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Section 1: Title VI Plan Approval & Compliance Requirements

Title VI Plan
Adopted on: 04/18/2023

Adopted by: The Arc Wabash County Board of Directors,
Board Chair Gary Larson

Signature(s): _____

Approval: Board of Directors Meeting, Tuesday, April, 18, 2023.

Policy Statement

The Arc of Wabash County, Inc. 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 Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), and the U.S. Department of Transportation implementing regulations.

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.

The Arc of Wabash County, 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: **09/03/2019.**

Title VI Plan Revision Log

Date Month/day/year	Section Revised	Summary of Revisions
06/29/21	All Sections of Title VI Plan	Plan updated to meet FTA and State

Section 2: Title VI Policy Statement

Policy Statement

The Arc of Wabash County Inc, operating as a 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 **Arc of Wabash County, 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 **Arc of Wabash County, Inc.** Notice to the Public is as follows:

Notifying the Public of Rights Under Title VI

The Arc of Wabash County

- The **Arc of Wabash County, 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 **Arc of Wabash County, Inc.**
- For more information on the **Arc of Wabash County, Inc.'s** civil rights program, the procedures to file a complaint, or to file a complaint, please contact **Jeff Patton, President/CEO** at **260-563-8411**, email jpatton@arcwabash.org; or visit our administrative office at **595 S Miami Street, Wabash, IN 46992**. For more information, visit <https://arcwabash.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, contact **260-563-8411**.

The **Arc of Wabash County, Inc.'s** Notice to the Public is posted in the public areas of the office and inside the transit vehicles.

1. 595 S Miami Street, Wabash, IN 46992.

Section 4: Title VI Complaint Procedure

The **Arc of Wabash County Inc.**'s Title VI Complaint Procedure is made available in the following locations:

- ☒ Agency website, if available: <https://arcwabash.org>
 - ☒ Hard copy in the central office
 - ☒ Agency Title VI Plan
-

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 **Arc of Wabash County, 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 **Arc of Wabash County, 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 **Arc of Wabash County, 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 **Arc of Wabash County, Inc.** has 45 days to investigate the complaint. If more information is needed to resolve the case, the **Arc of Wabash County, 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 **Arc of Wabash County, 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.

If information is needed in another language, then contact **260-563-8411**.

Section 5: Title VI Complaint Form

The Arc of Wabash County, Inc.'s Title VI Complaint Procedure is made available in the following locations:

- Agency website, if available: <https://arcwabash.org>.
- Hard copy in the central office
- Agency Title VI Plan

Section I:			
Name:			
Address:			
Telephone (Home):		Telephone (Work):	
Email Address:			
Accessible Format Requirements?	Large Print		Audio Tape
	TDD		Other
Section II:			
Are you filing this complaint on your own behalf?		Yes*	No
*If you answered "yes" to this question, go to Section III.			
If not, please supply the name and relationship of the person for whom you are complaining:			
Please explain why you have filed for a third party:			
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.		Yes	No
Section III:			
I believe the discrimination I experienced was based on (check all that apply):			
<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

If information is needed in another language, contact 260-563-8411.

Please submit this form to:

The Arc of Wabash County, Inc.
595 S Miami Street, PO Box 400, Wabash, IN 46992
260-563-8411
arc@arcwabash.org

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

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

Check One:

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 **Arc of Wabash County, 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 **Arc of Wabash County, 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	The Arc of Wabash County, Inc. Staffer(s) or Department	Activity	Communication Method (Public notice, posters, social media)	Notes
July Annually	CEO and Board	Annual Membership Meeting	Mailer Announcement, Website, Public Notice	Meeting open to all Arc members
Quarterly	CEO	TAC	Email	CEO Attends
Quarterly	CEO	Regional TAC	Email	CEO Attends
Monthly	CEO	Arc Board Meeting	Public Notice & Email	CEO Attends with Board
May Annually	CEO	County Council Meeting	Public Notice	CEO Attends to Request Funding
Quarterly	COO	Advocacy, Human Rights, and Inclusion Council	Email	COO Attends to Lead Advocacy for Persons with Disabilities
Quarterly	COO	Council of Persons Served	Email and Verbal for Persons with Disabilities	COO Attends to Facilitate Self-Advocacy for Persons with Disabilities

May Annually COO Satisfaction Surveys In-Person COO Coordinates for Persons with Disabilities

Section 8: Language Assistance Plan

Plan Components

As a recipient of federal US DOT funding, the **Arc of Wabash County, 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.

The **Arc of Wabash County, Inc.'s** Language Assistance Plan includes the following elements:

Item #1: The results of the Four Factor Analysis, including a description of the LEP population(s), served.

Item #2: A description of how language assistance services are provided by language

Item #3: A description of how LEP persons are informed of the availability of language assistance service

Item #4: A description of how the language assistance plan is monitored and updated

Item #5: A description of how employees are trained to provide language assistance to LEP persons

Four Factor Analysis Methodology

To determine if an individual is entitled to language assistance and what specific services are appropriate, the **Arc of Wabash County, Inc.** has conducted a Four Factor Analysis of the following areas: 1) Limited-English Proficient (LEP) Speaker Demography, 2) Contact Frequency, 3) Importance of Service, and 4) Resources and Costs.

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient. In addition to the number or proportion of LEP persons served, the **Arc of Wabash County, Inc.** will identify:

- (a) How LEP persons interact with the recipient's agency;
- (b) Identification of LEP communities, and assessing the number or proportion of LEP persons from each language group to determine the appropriate language services for each language;
- (c) The literacy skills of LEP populations in their native languages, in order to determine whether translation of documents will be an effective practice;
- (d) Whether LEP persons are underserved by the recipient due to language barriers.

Factor 2: The frequency with which LEP persons come into contact with the program: Identifies and assesses the frequency **Arc of Wabash County, Inc.'s** staff comes into contact with LEP persons. Examples of contact could include:

- (a) Use of bus and rail service;

- (b) Purchase of tickets through vending machines, outlets, websites, and over the phone;
- (c) Participation in public meetings;
- (d) Customer service interactions;
- (e) Ridership surveys;
- (f) Operator surveys.

Factor 3: The nature and importance of the program, activity, or service provided by the program to people’s lives. Generally speaking, the more important the program, the more frequent the contact and the likelihood that language services will be needed.

Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach. Resource and cost issues can often be reduced by technological advances, reasonable business practices, and the sharing of language assistance materials and services among and between recipients, advocacy groups, LEP populations and Federal agencies. Large entities and those entities serving a significant number of LEP persons should ensure that their resource limitations are well substantiated before using this factor as a reason to limit language assistance.

Item #1 – Results of the Four Factor Analysis (including a description of the LEP population(s) served)

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered.

The Arc of Wabash County is below the Safe Harbor Threshold for LEP and so interaction with LEP persons is very low and not common. The Arc of Wabash County, Inc. provides transportation services to individuals with intellectual and developmental disabilities in Wabash County. These clients are enrolled with Arc services through FSSA, BDDS, Medicaid, and/or Indiana Vocational Rehabilitation. The population of Wabash County, Indiana is 30,800, and is 93.7% White and 2.9% Hispanic (U.S. Census Bureau). According to https://www.lep.gov/maps/lma2015/Final_508, 411 persons in Wabash County are LEP, which is 1.3% of the total population. Transportation staff at the Arc of Wabash County, Inc. very rarely encounter LEP persons in Wabash County, except social encounters in food service and retail environments. Very rarely will the Arc of Wabash County, Inc. be solicited for transportation service from LEP persons.

The Arc of Wabash County, Inc. does not believe that LEP persons are underserved in Wabash County due to language barriers. If an LEP persons solicits service from the Arc of Wabash County, the Arc will provide written translated vital documents to said persons in said language.

In fiscal year 2022 (July 1, 2021 – June 30, 2022), the Arc of Wabash County, Inc. provided over 20,000 one-way transports for approximately 150 persons and there were no encounters or requests from LEP persons.

Wabash County Indiana – Languages Spoke at Home

	Total Number of People	Percent of Population that Speaks Language other than English	Total Population of County/City/Service Area
Speak Language other than English			
Speak English Less than Very Well	411	1.3	30,800
Spanish	411	1.3	30,800

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

The Arc of Wabash County, Inc. assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. **The Arc of Wabash County, Inc.** provides approximately 20,000 one-way passenger trips per year for approximately 150 people. If an individual has speech limitations, the dispatcher or driver will work with the Indiana Department of Transportation, if needed, to ensure the individual receives access to the transit services.

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

All of **Arc of Wabash County, Inc.’s** programs are important; however, those related to safety, public transit, nondiscrimination and public involvement are among the most important. **The Arc of Wabash County, 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 **Arc of Wabash County, Inc.** will strive to provide alternative but meaningfully accessibility. Moreover, the **Arc of Wabash County, 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 available in insert languages(s) upon request.

The Arc of Wabash County, Inc. provides programs and services which would have serious consequences to individuals if language barriers prevented access to information or the benefits of those programs and services. These programs and services include pre-vocational employment training, supported residential housing, supported community employment, community-based socialization activities, recreation, and advocacy.

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

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

If needed, **the Arc of Wabash County, Inc.** will utilize the service of a local translator to provide all needed LEP assistance. **The Arc of Wabash County, Inc.** participates in various community-based groups in which the needs of any LEP persons may be presented, such as the United Fund, the AWS Foundation Roundtable, and TAC/Regional TAC.

Item # 2 – Description of how Language Assistance Services are Provided, by Language
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The **Arc of Wabash County, Inc.** has identified, developed, and uses the following:

- a) Individuals who enroll in services at **the Arc of Wabash County, Inc.** can be provided with a translator if one is needed.
- b) **The Arc of Wabash County, Inc.** has developed partnerships with local agencies, organizations, law enforcement, colleges/universities, local school districts and social service agencies that are available to assist with it LEP responsibilities.
- c) **The Arc of Wabash County, Inc.** is willing to utilize smart phone language translation apps if needed, such as iTranslate Translator, Google Translate, or Microsoft Translator.

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 **the Arc of Wabash County, Inc.'s** language assistance measures, **the Arc of Wabash County, Inc.** provides the following:

- Title VI Program including the Language Assistance Plan is made available in hard copy in the main office at 595 S Miami Street, Wabash, IN 46992.
- Language translation apps for smart phones can be utilized.

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

The Arc of Wabash County, 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 of 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 **Arc of Wabash County** 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 **the Arc of Wabash County, Inc.'s** financial resources are sufficient to fund language assistance resources needed.
- Determine whether **the Arc of Wabash County, Inc.** has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning **the Arc of Wabash County, 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 **the Arc of Wabash County, Inc.** staff:

- Information on **the Arc of Wabash County, Inc.'s** Title VI Procedures and LEP responsibilities.
- Description of language assistance services offered to Arc clients.
- Documentation of language assistance requests.
- Use of language translation apps for smartphones.
- How to handle a potential Title VI / LEP complaint.

LEP Policy

The Arc of Wabash County, 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 **the Arc of Wabash County, Inc.** to obtain translators. The agency will also utilize language translation smartphone apps when applicable and possible.

If you need help with English, please call 260-563-8411.

If you need help in Spanish, Si usted necesita ayuda con el inglés, por favor llame 260-563-8411.

“I Speak” Language Identification Card

Mark this Box if you speak...	Language Identification Chart	Language
	Mark this box if you read or speak English	English
	Marque esta casilla si lee o habla español	Spanish
	Kos lub voj no yog koj paub twm thiab hais lus Hmoob	Hmong
	如果说中国在方框内打勾	Chinese
	Xin ñaùnh daáu vaøo oâ naøy neáu quyù vò bieát ñoïc vaø noui ñöôic Vieät	Vietnames
	당신이한국어말할경우이 상자를표시	Korean
	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng	Tagalog
	Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder	German
	Отметить этот флажок, если вы говорите по-русски	Russian
	Означите ову кућицу ако говорите српски	Serbian
	आप हिंदी बोलते हैं तो इस बक्से को चिह्नित करें	Hindi
	پر نشان لگائیں تو اس باکس بولتے ہیں اردو اگر آپ	Urdu

Note: For additional languages visit the US Census Bureau website <http://www.lep.gov/ISpeakCards2004.pdf>

Log of LEP Encounters

Date	Time	Language Spoken By Individual (if	Name and Phone Number of Individual	Service Requested	Follow Up Required	Staff Member Providing Assistance	Notes

Section 9: Minority Representation Information

Recipients that have **transit-related**, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

***Guidance:** Elected transit-related board, committee, or council, do not need to complete the table below, and write in section B that there are no non-elected transit-related boards, committees, or councils.

A. Minority Representation Table

Table Depicting Membership of Board, Committees, Councils, Broken Down by Race

Body	Caucasian	Hispanic	African American	A s i a n American	N a t i v e American	Two or More Races
Board of Directors (9)	100%	0%	0%	0%	0%	0%

Note: insert the number of people and % of total board membership

B. Efforts to Encourage Minority Participation

To encourage participation on its boards, committees, and councils, the **Arc of Wabash County, Inc.** will make every effort to encourage minority participation on the boards.

The Arc of Wabash County, Inc. has a fair, open Board member recruitment process which includes oversight by a Board Member Recruitment Committee that contains volunteer community members. An open, equitable Board Member application with expectations will be posted on the organization's website which can be completed at any time. **The Arc of Wabash County's** volunteer Board of Directors values diversity and annually puts forth a list of potential community members to pursue for application for open Board seats.

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)

Insert Agency Name monitors subrecipients using the following process:

1. Insert Agency Name uses the following process for ensuring all subrecipients are complying with the general reporting requirements of FTA Circular 4702.1B: (document the process here)
2. Insert Agency Name collects Title VI programs from the subrecipients listed above and reviews programs for compliance by (list the process 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.

The Arc of Wabash County, Inc.:

is a fixed route transit provider

is **not** a fixed route transit provider