Indianapolis Public Transportation Corporation Title VI Program

Compliant with Federal Transit Administration Circular 4702.1B



Indianapolis Public Transportation Corporation



January 2014

SRF No. 013-08074

Title VI Program

This document is being submitted by the Indianapolis Public Transportation Corporation (IndyGo) to the Federal Transit Administration (FTA) in compliance with the requirements of FTA Circular 4702.1B "Title VI Requirement and Guidelines for Federal Transit Administration Recipients." This document specifically meets the requirements of Chapter III, Part 4 "Requirement to Prepare and Submit a Title VI Program." The necessary contents of each Title VI program, as outlined in Chapter III, are shown below with responses detailing how IndyGo has met each requirement.

(1) A copy of the recipient's Title VI notice to the public that indicates the recipient complies with Title VI, and informs members of the public of the protections against discrimination afforded to them by Title VI. Include a list of locations where the notice is posted.

IndyGo's notice states that IndyGo operates without regard to race, color, or national origin. The notice also directs members of the public to additional information and complaint procedures and forms if they feel they have been the victim of discrimination under Title VI. The text of the notice reads as follows:

"In accordance with Title VI of the Civil Rights Act of 1964, IndyGo operates its programs without regard to race, color or national origin. If you believe you have been the victim of a discriminatory practice under Title VI, you may file an official complaint. For more information on IndyGo's Title VI Policy and the procedures to file a complaint, contact:

IndyGo Customer Service 317.635.3344 Monday – Friday: 7 a.m. – 7 p.m. Saturday: 9 a.m. – Noon www.IndyGo.net"

IndyGo uses this text to notify the public of its compliance with Title VI requirements in the following locations:

- 8.5x11 inch flyers posted in all transit vehicles
- Fixed Route Service Rider Guidelines
- Open Door Service Rider Guidelines
- System Map
- IndyGo Title VI Website (<u>www.indygo.net/title-vi-policy</u>)
- IndyGo reception desk and meeting rooms

Copies of the transit vehicle flyer, system map, and a website screen capture have been provided in Appendix A

(2) A copy of the recipient's instructions to the public regarding how to file a Title VI discrimination complaint, including a copy of the complaint form.

The IndyGo Title VI Notice directs members of the public to IndyGo's Title VI Complaint Procedure Process on the IndyGo website. These procedures and the associated complaint forms are included in Appendix B.

(3) A list of any public transportation-related Title VI investigations, complaints, or lawsuits filed with the recipient since the time of the last submission.

IndyGo has not had any public transportation-related Title VI investigations, complaints, or lawsuits filed since the previous Title VI Program submission.

(4) A public participation plan that includes an outreach plan to engage minority and limited English proficient populations, as well as a summary of outreach efforts made since the last Title VI Program submission.

IndyGo's public engagement plan is included in Appendix C. The plan describes all aspects of the public engagement process including, the thresholds for determining when public hearings are necessary, the appropriate timeline and means of communication for advertising the public hearing, acceptable venues for meetings, and the required contents for the public hearings. The document also includes strategies for providing meaningful outreach to limited English proficient (LEP) populations.

Since the previous Title VI program submittal, IndyGo has conducted a number of focused public outreach efforts. These include:

- Efforts related to the two phases of the 2013 service improvements.
- Public outreach related to IndyGo's proposed Title VI policies under the requirements of the new FTA Circular.
- Public outreach related to a proposed 2010 fare increase and service changes (the proposed changes were not implemented).

In addition to these focused efforts IndyGo continues to provide information to, and solicit feedback from, the public via traditional and social media and its customer service programs.

(5) A copy of the recipient's plan for providing language assistance to persons with limited English proficiency, based on the DOT LEP Guidance.

IndyGo's plan for providing language assistance to LEP populations, including a four-factor analysis, is provided in Appendix C.

(6) Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar bodies, 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 or councils.

IndyGo's Board of Directors consists of seven members which are appointed by the Mayor of Indianapolis and the City-County Council of Indianapolis and Marion County. As such, this requirement does not apply.

A separate Mobility Advisory Council (MAC) has been established by the Board of Directors to advise IndyGo on the provision of public transportation services for individuals with disabilities and provide education to the general public about these transportation needs. The nine-member group consists of:

- Four individuals residing within the IndyGo service area who are persons with disabilities and familiar with paratransit service within the area;
- Three individuals representing agencies, businesses, or not-for-profit groups within the IndyGo service area that provide services to persons with disabilities;
- Two individuals representing employers who have demonstrated their commitment to hiring and supporting the needs of persons with disabilities.

The current racial makeup of the MAC is three individuals who identify as Black or African American, one individual who identifies as Hispanic or Latino, and two individuals who identify as White. Two positions on the MAC are currently vacant. Given the historically diverse racial makeup of MAC members, no additional steps have been deemed necessary to encourage minority participation on the MAC. The racial breakdown of the MAC is summarized in the table below.

Table 1. Mobility Advisory Committee Breakdown by Race/Ethnicity

	Service Area		Mobility Advisory Committee	
Non-Hispanic, White	511,018	60%	2	33%
Hispanic or Latino	79,311	9%	1	17%
Black or African American	226,751	26%	3	50%
American Indian and Alaska Native	1,852	0%	0	0%
Asian	17,470	2%	0	0%
Native Hawaiian and Other Pacific Islander	285	0%	0	0%
Other	2,192	0%	0	0%
Two or More Races	18,513	2%	0	0%

(7) Primary recipients shall include a narrative or description of efforts the primary recipient uses to ensure subrecipients are complying with Title VI, as well as a schedule of subrecipient Title VI program submissions.

IndyGo extends Federal financial assistance to subrecipients through the JARC, New Freedom, and Section 5310 programs. IndyGo provides a summary and checklist of Title VI program requirements, a sample notice to the public, sample complaint form and sample complaint procedures to all subrecipients. Copies of these documents have been provided in Appendix D. IndyGo also provides Title VI (initial/refresher) training to all potential subrecipients during the annual "call for projects" meeting. Subrecipients are additionally provided either a copy of or link to the IndyGo Title VI Program Plan, which includes the IndyGo notice to the public, complaint form and complaint procedures for their reference.

Subrecipients are required to submit their Title VI Program documentation to IndyGo every 3 years. Title VI Program documentation will be received from subrecipients in 2014. The IPTC Director of Compliance and Civil Rights completes a compliance review of each subrecipient and issues a review letter advising the subrecipient that they are either in compliance or that follow up is needed. Subrecipients are additionally monitored for Title VI compliance during site visits. A copy of the site visit checklist has been provided in Appendix D. All subrecipients also annually complete the FTA-required Title VI certifications and assurances. In addition, IndyGo monitors subrecipients by requiring Title VI complaint reports and a summary of public outreach and involvement activities on an annual basis.

(8) If the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc., the recipient shall include a copy of the Title VI equity analysis conducted during the planning stage with regard to the location of the facility.

IndyGo has not constructed a major facility since the previous Title VI Program submission.

- (9) Additional information as specified in chapters IV, V, and VI, depending on whether the recipient is a fixed route transit provider, a State, or an MPO.
 - a. System-wide service standards and system-wide service policies, whether existing or new (i.e., adopted by the transit provider since the last submission).

IndyGo uses the following system-wide service standards and policies to evaluate transit service:

- Vehicle Load: IndyGo's service standard for vehicle load is a maximum peak load factor of 1.25 and a maximum off-peak load factor of 1.00. Load factor is defined as the number of passengers on a bus divided by the number of seats available. IndyGo's peak periods are defined as weekdays between 6:00 a.m. and 9:00 a.m. and between 3:00 p.m. and 6:00 p.m.
- Vehicle Headway: IndyGo's service standard for vehicle headway is 30 minutes or less during peak periods and 60 minutes or less during off-peak periods.
- On-Time Performance: IndyGo measures the on-time performance of its
 buses at set timepoints along each route. IndyGo defines a bus arrival as ontime if it arrives at a timepoint no more than one minute earlier or five
 minutes later than the scheduled arrival time. IndyGo's service standard is for
 90 percent of bus timepoint arrivals to be on-time.
- Service Availability: IndyGo's service standard for service availability is for 80 percent of the service area population to be located within three-quarter miles of transit service.

• Distribution of Transit Amenities:

- **Shelter:** Daily passenger boardings should be at least 20 for shelter placement.
- **Bench:** Daily passenger boardings should be at least 10 for bench placement.
- Simme-Seat: Daily passenger boardings should be at least five for Simme-Seat placement.
- **Trash Bin:** Trash bins are to be provided at every stop with a shelter.
- Bicycle Racks: Bicycle rack placement is evaluated on a case-by-case basis.
- **Lighting:** IndyGo provided hard-wired lighting fixtures at any site where the property owner is willing to connect and pay for usage charges. Solar

lighting for bus stop shelters may be available for poorly lit areas and will be determined on a case-by-case basis.

- **Vehicle Assignment:** IndyGo's service policy is for its transit vehicles to be assigned equitably between all routes with regard to vehicle age.
- b. A demographic analysis of the transit provider's service area. This shall include demographic maps and charts completed since submission of the last Title VI Program that contains demographic information and service profiles.

Maps highlighting the distribution of minority, non-minority, low-income, and non-low-income populations throughout the IndyGo service area are included in the Service Equity Evaluation in Appendix H. Additional maps also highlight the distribution of minority, non-minority, low-income, and non-low-income routes as defined by the FTA.

The demographic profile of the IndyGo fixed-route service area is shown in Figure 1. The IndyGo fixed-route service area is defined as the extents of Marion County with the exception of the City of Lawrence. It should be noted that IndyGo Open Door service is provided within the City of Lawrence. The demographic data is from the 2010 U.S. Decennial Census. The total population for the IndyGo service area is 857,392.

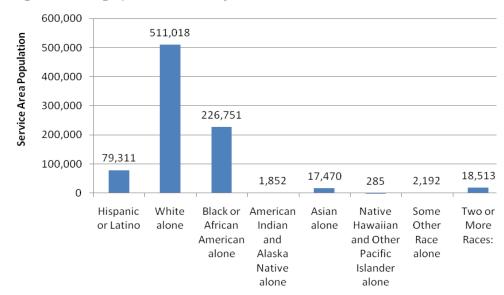


Figure 1: Demographic Profile of IndyGo Fixed-Route Service Area

c. Data regarding customer demographics and travel patterns, collected from passenger surveys.

The most recent on-board passenger survey was conducted in 2009. The executive summary of the report summarizing this information is provided in Appendix F, as well as a sample of the survey provided to customers. This survey did not include a question regarding the fare payment type or media most commonly used by users. The survey was conducted when FTA Circular 4702.1A was still in effect. While this Circular recommended that transit providers collect data regarding fare usage, it was not an explicit requirement as it currently is in FTA's Circular 4702.1B.

IndyGo's next passenger survey is scheduled to occur in the spring of 2016, following the opening of the planned downtown transit center, and before the submittal of the next Title VI Program update. IndyGo will revise their passenger survey to include a question regarding fare type in order to generate the information necessary to complete a fare equity evaluation if necessary.

d. Results of the monitoring program of service standards and policies and any action taken, including documentation (e.g., a resolution, copy of meeting minutes, or similar documentation) to verify the board's or governing entity or official(s)'s consideration, awareness, and approval of the monitoring results.

The most recent IndyGo Service Monitoring Report as well as meeting minutes documenting the IndyGo Board's review and approval of the report is included in Appendix E.

e. A description of the public engagement process for setting the "major service change policy" and disparate impact policy.

IndyGo conducted a public engagement process to solicit feedback from the public on its proposed Title VI policies for "major service change," "disparate impact," and "disproportionate burden" in June 2013. A summary of the public outreach efforts and comments received by the public are provided in Appendix G

f. A copy of board meeting minutes or a resolution demonstrating the board's or governing entity or official(s)'s consideration, awareness, and approval of the major service change policy and disparate impact policy.

The meeting minutes documenting the IndyGo Board's review and approval of the proposed Title VI policies are included in the summary of public outreach efforts in Appendix G.

g. Results of equity analyses for any major service changes and/or fare changes implemented since the last Title VI Program submission.

IndyGo's service changes related to the 2013 Service Improvement plan were the only service changes that met the required thresholds for conducting a Service Equity Analysis. This analysis found no disparate impacts to minority population or disproportionate burdens to low-income populations as a result of the service improvements. The Service Equity Analysis report is provided in Appendix H.

No fare changes have been implemented since the previous Title VI Program submittal.

h. A copy of board meeting minutes or a resolution demonstrating the board's or governing entity or official(s)'s consideration, awareness, and approval of the equity analysis for any service or fare changes required by this circular.

The meeting minutes documenting the IndyGo Board's review and approval of the 2013 Service Improvements Service Equity Analysis are included with the Service Equity Analysis report in Appendix H.

Title VI Notice to the Public

INDYGO TITLE VI POLICY

In accordance with Title VI of the Civil Rights Act of 1964, IndyGo operates its programs without regard to race, color or national origin. If you believe you have been the victim of a discriminatory practice under Title VI, you may file an official complaint. For more information on IndyGo's Title VI Policy and the procedures to file a complaint, contact:

INDYGO CUSTOMER SERVICE

317.635.3344

Monday – Friday: 7 a.m. – 7 p.m. Saturday: 9 a.m. – Noon

www.IndyGo.net

AVISO:

INDYGO NORMA DEL TÍTULO VI

De conformidad con el Título VI de la ley de Derechos Civiles de 1964, IndyGo opera las programas de transporte sin consideración de la raza, el color u origen nacional. Si usted cree que ha sido víctima de una práctica discriminatoria en virtud del Título VI, puede presentar una queja oficial. Para más información sobre la norma del título VI y el proceso de presenter una queja, contacte:

INDYGO SERVICIO AL CLIENTE

317.635.3344

lunes – viernes: 7 a.m. – 7 p.m. sábado: 9 a.m. – mediodía

www.IndyGo.net



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317.635.3344

Monday – Friday: 7 a.m. – 7 p.m. Saturday: 9 a.m. – Noon www.lndyGo.net



IndyGo's Title VI Policy

IndyGo welcomes feedback from passengers and the community.

If you have comments, complaints or believe you have been denied the benefits of IndyGo's services on the basis of age, sex or disability/handicap please call our Customer Service Center or fill out the <u>online comment form</u>. Your comment will be entered into a database and investigated by the appropriate IndyGo department. For all comments, if a response is requested, staff will follow up within 10 business days.

IndyGo operates its programs without regard to race, color or national origin in accordance with Title VI of the Civil Rights Act of 1964.

If you believe you have been the victim of a discriminatory practice due to your race, color or national origin, you may file an official Title VI complaint. For more information on IndyGo's Title VI Policy and the procedures to file a complaint, contact IndyGo Customer Service or fill out the <u>Title VI Complaint Form</u>. Once the form is completed, mail or fax it to the IndyGo Director of Compliance and Civil Rights. (<u>En Español</u>)

Mail: 1501 W. Washington St. Indianapolis, IN 46222

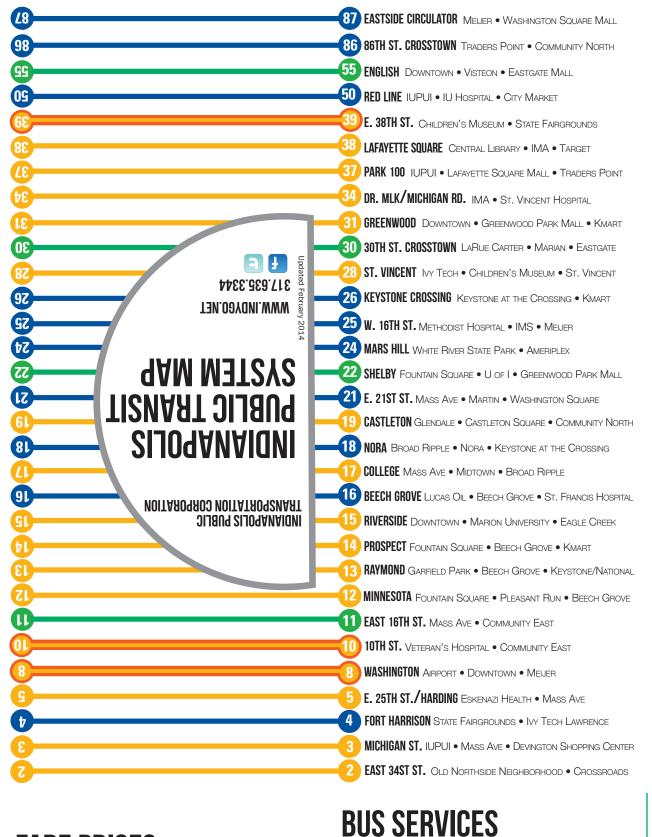
Fax: 317.634.6585

IndyGo Customer Service: 317.635.3344

Monday - Friday: 7 a.m. - 7 p.m.

Saturday: 9 a.m. - Noon

Download IndyGo's full Title VI Complaint Procedure. (En Español)



IndyGo's Fixed Routes primarily serve Marion

County, using a hub-and-spoke system

that brings most routes into the downtown

area. The Route 8 serves the Indianapolis

IndyGo offers Frequent Service on three

routes Monday through Friday between 7

a.m. and 6 p.m. Route 39 - East 38th Street

and portions of Route 8 – Washington and

Passengers are not allowed to "joyride" or

stay on the bus for multiple trips, you may

only make one complete round trip. If you

exit the bus, you may be asked to pay an

Passengers must refrain from disruptive

behavior including talking loudly on cell

phones, shouting profanity or rude insults,

solicitation of services or favors, threatening

or hostile remarks and listening to loud music

with or without earphones. Throwing objects

from the bus, sticking anything out of the

Passengers must wear a shirt and shoes

be empty and collapsed before boarding

the bus. Rollerblades and skates must be

to be allowed on board. Strollers must

when you depart is strictly prohibited.

bus windows or leaving anything on the bus

additional fare or swipe your pass to re-enter.

Route 10 – 10th Street depart every 20

days a week.

minutes or better.

INDYGO RULES

International Airport every 30 minutes, seven

FARE PRICES

Pass Type	Full Fare	Half Fare
Single Ride*	\$1.75	\$.85
Day Pass*	\$4.00	\$2.00
10-Trip	\$17.50	\$8.50
7-Day Pass	\$20.00	\$10.00
31-Day Pass	\$60.00	\$30.00
Open Door	\$3.50	na
Summer Youth Pass (June-Aug.)	\$30.00	na
College S-Pass**	\$30.00	na

Children age 5 and under ride for free with paying passenger (limit two).

IndyGo offers half fare pricing to persons 65 and older, youth 18 and younger and persons with disabilities. In order to ride IndyGo using a half fare pass or to pay half fare on-board, individuals must show a valid form of ID to prove eligibility: IndyGo Half Fare ID Card (cost is \$2 and an application must be completed and submitted at the Customer Service Retail Center), K-12 Student ID, or government-issued Medicare Card.

PURCHASING OPTIONS

- 1. By calling the IndyGo Customer Service Call Center 317.635.3344 (Relay Indiana: 711) Mon – Fri 7 a.m. – 7 p.m., Sat 9 a.m. – Noon
- 2. Online at www.lndyGo.net 3. At the IndyGo Customer Service Retail Center
- 34 N. Delaware Street Mon - Fri 8 a.m. - 6 p.m., Sat 9 a.m. - Noon
- 4. On board an IndyGo bus*
- 5. At partner locations: IUPUI Campus Center, DNR Customer Service Center, Indiana Government Center South, PLS Check Cashers***
- * On board, only exact change can be used and you may only purchase single rides & day passes. Use the IndyGo Call or Retail Center to purchase any pass type, except
- ** S-Passes are available through participating colleges or universities. In order to use an S-Pass, a valid college student ID card is required upon boarding.
- *** Partner locations may not carry all pass types. Contact IndyGo Customer Service Call Center



removed and carried onto the bus.

The following items are not permitted on IndyGo buses: Explosives, Knives (Cutting tools required for work are permitted), Car Batteries, Compressed Gas Bottles and Fuel Storage Containers. Smoking is prohibited in IndyGo bus shelters and on buses. Food and drinks are not allowed on IndyGo buses unless they are sealed.

Animals are only allowed on an IndyGo bus if they are in a leak-proof carrier or are service animals. Under the Americans with Disabilities Act of 1990, a service animal is defined as "any guide dog, signal dog, or other animal that is individually trained to do work or perform tasks for an individual with a disability." 49 CFR 37.3

IndyGo Supervisors or any responding Law Enforcement Agency may remove passengers for not adhering to IndyGo procedures or policies. Riding privileges may also be revoked.

SAFETY

All IndyGo vehicles are equipped with audio and video surveillance equipment. IndyGo also contracts full-time, dedicated police officers to help ensure the safety of all passengers.

LOST & FOUND

IndyGo assumes no responsibility for items that are left on board. When items are found, they are typically available the next business day at the IndyGo Retail Center, located at 34 N. Delaware. Customer Service does not contact bus operators regarding lost items; you must wait for them to be taken to the Retail Center. To claim your property, you must appear in person between 11:30 a.m. and 5:30 p.m., provide an accurate description of the item, show your photo ID and sign a property claim tag with your name, address and phone number. Found items will not be held indefinitely. Please visit the Retail Center within a week of losing your

DETOURS

Detours are common due to special events and construction. General detour information can be found on-board, on yellow service alert cards located near the roof of the bus. More detailed information about detours can be found at IndyGo.net, on IndyGo's Twitter and Facebook pages or by calling 635.3344 closer to the event date.

CUSTOMER COMPLAINTS AND TITLE VI

IndyGo welcomes feedback from passengers and the community.

If you have comments, complaints or believe you have been denied the benefits of IndyGo's services on the basis of age, sex or disability/ handicap please call our Customer Service Center at 317.635.3344 or fill out the online comment form at IndyGo.net.

Your comment will be entered into a database and investigated by the appropriate IndyGo department. For all comments, if a response is requested, staff will follow up within 10 business days.

IndyGo operates its programs without regard to race, color or national origin in accordance with Title VI of the Civil Rights Act of 1964.

If you believe you have been the victim of a discriminatory practice due to your race, color or national origin, you may file an official Title VI complaint. For more information on IndyGo's Title VI Policy and the procedures to file a complaint, contact IndyGo Customer Service at 317.635.3344 or visit IndyGo.net.

OBSERVED HOLIDAYS

IndyGo routes operate 365 days a year. On observed holidays, please refer to Sunday schedules unless otherwise indicated. Routes without Sunday service will not operate on observed holidays. Customer Service may be closed or operate on a shortened schedule for holidays.

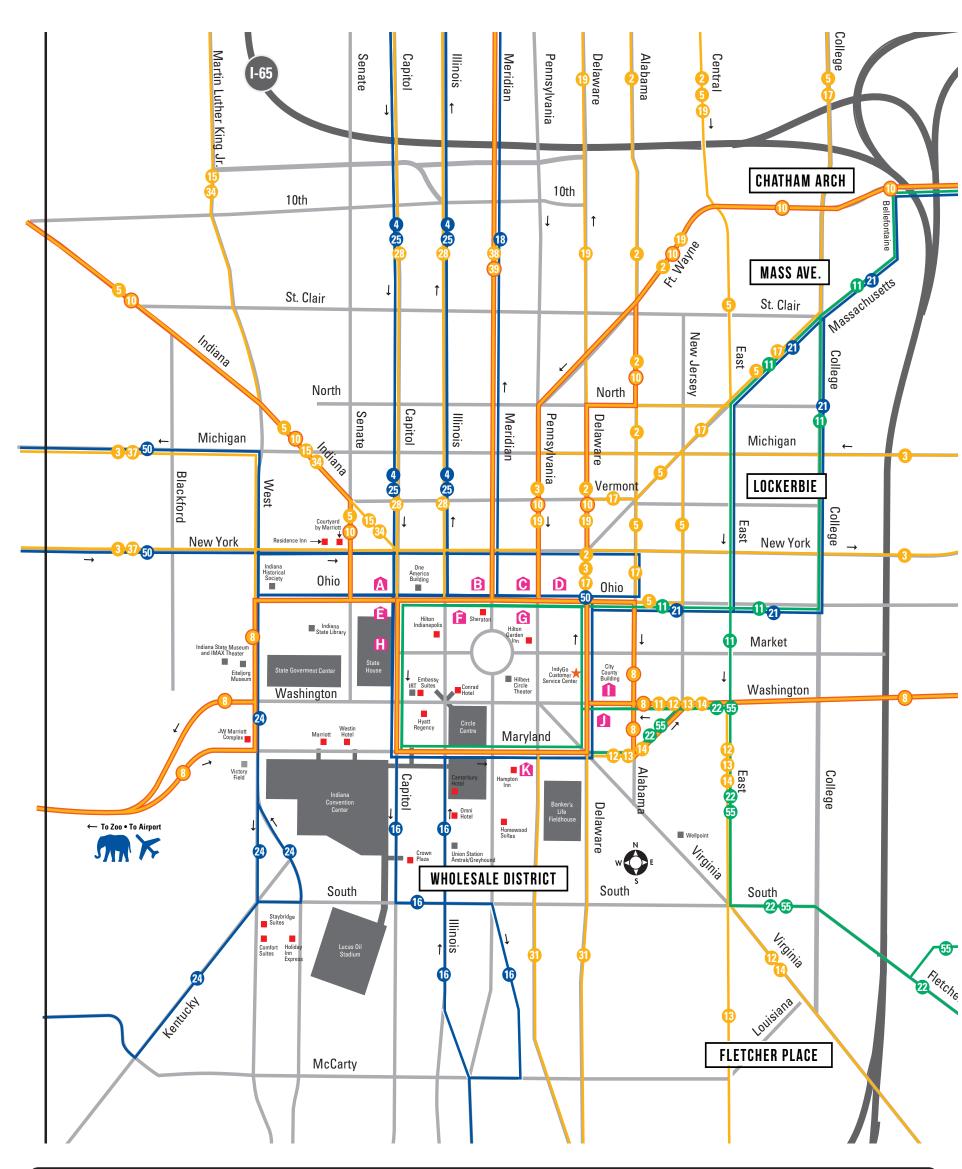
- New Year's Day
- Martin Luther King, Jr. Day (Saturday Schedule)
- Memorial Day
- Independence Day
- Labor Day
- Thanksgiving Day
- Christmas Day

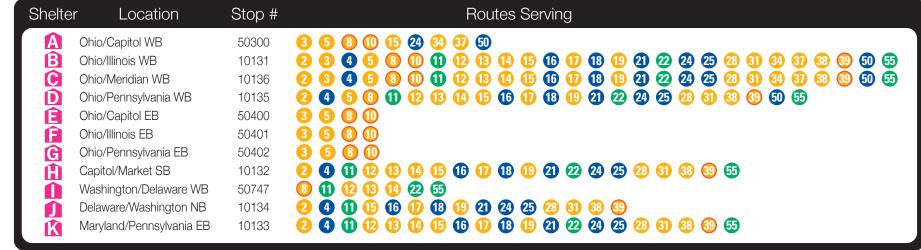






Information subject to change. Contact the Customer Service Center for the most up-to-date information.





DOWNTOWN ATTRACTIONS AND EVENTS

To find downtown Indianapolis attractions and events that IndyGo can get you to, visit Indianapolis Downtown at www.indydt.com or Visit Indy at www.visitindy.com.





Title VI Complaint Procedures and Complaint Form

TITLE VI COMPLAINT PROCEDURE

Any person who believes she or he has been discriminated against on the basis of race, color or national origin by the **Indianapolis Public Transportation Corporation (IPTC)** may file a Title VI complaint by completing and submitting the corporation's Title VI Complaint Form by mail or fax to the attention of the Director of Compliance and Civil Rights. IPTC investigates complaints received no more than 180 days after the alleged incident. IPTC will only process complaints that are complete. Complaint forms may be found on the IPTC website or by calling the IndyGo Customer Service Call Center.

Once the complaint is received, IPTC will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

IPTC has 60 days to investigate the complaint. If more information is needed to resolve the case, IPTC may contact the complainant. The complainant has 10 business days from the date of the request letter to send the information to the Director of Compliance and Civil Rights. If the Director of Compliance and Civil Rights is not contacted by the complainant or does not receive the additional information within 10 business days, IPTC can administratively close the case. A case may also be administratively closed if the complainant no longer wishes to pursue his or her case.

After the Director of Compliance and Civil Rights reviews the complaint, she/he will issue one of two 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. An LOF summarizes the allegations and 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, she/he has 15 days after the date of the closure letter or LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration (FTA):

FTA Office of Civil Rights Attn: Title VI Program Coordinator East Building 1200 New Jersey Avenue SE Washington, DC 20590.

If information is needed in another language, call the IndyGo Customer Service Call Center at 317-635-3344.

Si se necesita información en otro idioma, llame al 317-635-3344.



IndyGo Title VI Complaint Form

Nam	ne of Complainant				Home Tele	phone
Hom	ne Address				Work Telep	phone
Stre	et	City, State			•	
Emai	il Address		,	L		
Pers	son discriminated agains	st (if other than Compla	inant)		Home Tele	phone
Hom	ne Address				Work Telep	phone
Stre	et	City, State	Zip		•	
1.	Specific basis of discri	mination (Check approp	riate box(es	s)):		
_	Race		Color			☐National Origin
_	J race					Divational Origin
2.	Date of alleged discrim	inatory act(s)				
3.	Respondent (Name no	sition and work location	of nerson	vou helieve discrim	ninated again	nst you (if annlicable))
		Sition and Work location	or person ;	you believe discrim	illiatea agail	not you (ii applicable).)
Nam	ne or Operator ID					
Posi	ition			Work Location		
1 031	ition			WORK Education		
4.		eve you were discrimina ditional sheets of paper.	ted against.	What happened a	nd who was	responsible? For
5.	If you answered yes, pl	aint with another federal lease check each agency	y with whon	n the complaint wa	s filed.	
	☐Federal Agency	Federal Court	□St	ate Agency	☐State Co	urt
	Agency Name and Date	Filed				
6.	Provide contact persor	n information for the add	litional ager	ncy or court:		
Nam	ne					
hhΑ	ress				Teleph	none
Stre		City, State		Zip	relebi	.00
			-	•		
	n complaint in the space nature	below. Attach any supp	porting doc	uments.		Date



IndyGo Formulario de Quejas del Título VI

Domicilio particular Ciudad, Estado Código postal Teléfono del trabajo Persona discriminada (si no es la misma que presenta la queja) Teléfono de la cassa Domicilio particular Ciudad, Estado Código postal Teléfono del trabajo Calle Ciudad, Estado Código postal Teléfono del trabajo 1. Fundamento específico de la discriminación (Marque los casilleros que correspondan): Raza Color Nacionalidad 2. Fecha del presunto acto o actos de discriminación	Non	nbre de la persona que pr	esenta la queja			Teléfono d	e la casa		
Persona discriminada (si no es la misma que presenta la queja) Domicilio particular Calle Ciudad, Estado Código postal Teléfono del trabajo 1. Fundamento específico de la discriminación (Marque los casilleros que correspondan): Raza Color Nacionalidad 2. Fecha del presunto acto o actos de discriminación Lugar de trabajo Lugar de trabajo 4. Describa cómo usted cree que fue discriminado. ¿Qué pasó y quién fue el responsable? Para obtener más espacio, adjunte hojas adicionales. 5. ¿Presentó esta demanda ante otra agencia local, estatal o federal, o ante un tribunal estatal o federal? Nombre Agencia federal Agencia federal Nombre Domicilio Ciudad, Estado Código postal Teléfono Teléfono del trabajo Teléfono del trabajo Teléfono del trabajo Teléfono del trabajo		•	Ciudad, Estado	Códige	postal	Teléfono d	el trabajo		
Domicillo particular Calle Ciudad, Estado Código postal Teléfono del trabajo Teléfono Teléfono Teléfono Teléfono Teléfono Teléfono Teléfono	Dire	cción de correo electrónic	:0						
Calle Ciudad, Estado Código postal 1. Fundamento específico de la discriminación (Marque los casilleros que correspondan): Raza	Pers	ona discriminada (si no es	s la misma que presenta la o	queja)		Teléfono d	e la casa		
Raza			Ciudad, Estado	Código	o postal	Teléfono d	el trabajo		
2. Fecha del presunto acto o actos de discriminación	1.	Fundamento específico o	de la discriminación (Marq	ue los cas	illeros que corres	pondan):			
3. Demandado (Nombre, cargo y el trabajo de ubicación de la persona que belive discriminó (si corresponde).) Nombre Puesto de trabajo 4. Describa cómo usted cree que fue discriminado. ¿Qué pasó y quién fue el responsable? Para obtener más espacio, adjunte hojas adicionales. 5. ¿Presentó esta demanda ante otra agencia local, estatal o federal, o ante un tribunal estatal o federal? Sí No Si la respuesta es sí, marque los organismos ante los cuales presentó la demanda: Agencia federal Tribunal federal Agencia estatal Tribunal estatal Agencia local Nombre de la agencia y fecha de presentación 6. Proporcione información de contacto de un representante del organismo adicional (agencia o tribunal) ante el cual presentó la demanda: Nombre Domicilio Ciudad, Estado Código postal Teléfono Firme esta demanda en el espacio que figura a continuación. Adjunte todo documento de respaldo.		□ Raza	□ Color		☐ Nacionalida	ad			
Puesto de trabajo 4. Describa cómo usted cree que fue discriminado. ¿Qué pasó y quién fue el responsable? Para obtener más espacio, adjunte hojas adicionales. 5. ¿Presentó esta demanda ante otra agencia local, estatal o federal, o ante un tribunal estatal o federal? Si No Si la respuesta es sí, marque los organismos ante los cuales presentó la demanda: Agencia federal Tribunal federal Agencia estatal Tribunal estatal Agencia local Nombre de la agencia y fecha de presentación 6. Proporcione información de contacto de un representante del organismo adicional (agencia o tribunal) ante el cual presentó la demanda: Nombre Domicilio Calle Ciudad, Estado Código postal Firme esta demanda en el espacio que figura a continuación. Adjunte todo documento de respaldo.	2.	Fecha del presunto acto	o actos de discriminación						
Puesto de trabajo 4. Describa cómo usted cree que fue discriminado. ¿Qué pasó y quién fue el responsable? Para obtener más espacio, adjunte hojas adicionales. 5. ¿Presentó esta demanda ante otra agencia local, estatal o federal, o ante un tribunal estatal o federal? Sí No Si la respuesta es sí, marque los organismos ante los cuales presentó la demanda: Agencia federal Tribunal federal Agencia estatal Tribunal estatal Agencia local Agencia local Agencia estatal Tribunal estatal Agencia local Agencia local Nombre de la agencia y fecha de presentante del organismo adicional (agencia o tribunal) ante el cual presentó la demanda: Nombre Domicilio Ciudad, Estado Código postal Teléfono Teléfono			argo y el trabajo de ubica	ción de la	a persona que be	elive discrimin	ó (si corres	sponde).)	
4. Describa cómo usted cree que fue discriminado. ¿Qué pasó y quién fue el responsable? Para obtener más espacio, adjunte hojas adicionales. 5. ¿Presentó esta demanda ante otra agencia local, estatal o federal, o ante un tribunal estatal o federal? Sí No Si la respuesta es sí, marque los organismos ante los cuales presentó la demanda: Agencia federal	Non	ibre							
5. ¿Presentó esta demanda ante otra agencia local, estatal o federal, o ante un tribunal estatal o federal? Sí No Si la respuesta es sí, marque los organismos ante los cuales presentó la demanda: Agencia federal Tribunal federal Agencia estatal Tribunal estatal Agencia local Nombre de la agencia y fecha de presentación 6. Proporcione información de contacto de un representante del organismo adicional (agencia o tribunal) ante el cual presentó la demanda: Nombre Domicilio Calle Ciudad, Estado Código postal Teléfono Teléfono	Pues	sto de trabajo			Lugar de traba	jo			
Si la respuesta es sí, marque los organismos ante los cuales presentó la demanda: Agencia federal Tribunal federal Agencia estatal Tribunal estatal Agencia local Nombre de la agencia y fecha de presentación	4.			¿Qué pas	só y quién fue el	responsable?	Para obter	ner más	
Si la respuesta es sí, marque los organismos ante los cuales presentó la demanda: Agencia federal Tribunal federal Agencia estatal Tribunal estatal Agencia local Nombre de la agencia y fecha de presentación									
Si la respuesta es sí, marque los organismos ante los cuales presentó la demanda: Agencia federal Tribunal federal Agencia estatal Tribunal estatal Agencia local Nombre de la agencia y fecha de presentación		_							
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Si la respuesta es sí, marque los organismos ante los cuales presentó la demanda: Agencia federal Tribunal federal Agencia estatal Tribunal estatal Agencia local Nombre de la agencia y fecha de presentación									
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6. Proporcione información de contacto de un representante del organismo adicional (agencia o tribunal) ante el cual presentó la demanda: Nombre Domicilio Calle Ciudad, Estado Código postal Teléfono Firme esta demanda en el espacio que figura a continuación. Adjunte todo documento de respaldo.		☐ Agencia federal	☐ Tribunal federal	☐ Age	ncia estatal	☐ Tribunal es	tatal	☐ Agenc	ia local
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			acio que figura a continuac	zión. Adju	inte todo docume	ento de respaid			

Language Assistance Plan and Four-Factor Analysis

IndyGo Language Assistance Plan

The purpose of this Language Assistance Plan (LAP) is to provide guidance on the strategies used to provide language assistance to IndyGo Customers who are not proficient in the English language. While the majority of the population within the IndyGo service area speaks English as their primary language, there are still many who struggle with language barriers preventing them from fully utilizing the transportation services that are available to them.

This LAP has been completed to meet the requirements of Title VI of the Civil Rights Act of 1964, which states that recipients of Federal financial assistance may not discriminate with regard to race, color, or national origin. Additionally, Executive Order 13166, "Improving Access to Service for Person with Limited English Proficiency" requires recipients of Federal financial assistance to "examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services consistent with, and without unduly burdening, the fundamental mission of the agency."

Four Factor Analysis

The four factor analysis is a process set by the Department of Justice to ensure that recipients of Federal financial assistance are ensuring meaningful access to programs and activities for Limited English Proficiency (LEP) populations. This assessment helps a recipient to determine if they are communicating effectively with LEP populations based on the following four criteria: 1) The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient; 2) The frequency with which LEP persons come into contact with the program; 3) The nature and importance of the program, activity, or service provided by the program to people's lives; and 4) The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach. Each of these factors is addressed below.

(1) The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.

In order to assess this factor, 2011 American Community Survey data was reviewed. Specifically, this assessment used the category "Language spoken at home by ability to speak English for the population 5 years and over" for population within the IndyGo service area. According to the data, the majority of this population (88 percent) speaks only English. In total, 6 percent of the population speaks another language at home and speaks English less than "very well" and are thus considered to have Limited English Proficiency.

The largest component of this LEP population is Spanish speaking at 77 percent. The next three largest language cohorts are Chinese (4.7 percent), French (2.4 percent), and Arabic (1.5 percent). The average size of the remaining LEP language groups is only 205 persons.

(2) The frequency with which LEP persons come into contact with the program.

It is difficult to accurately measure the frequency of interaction with LEP persons. The primary tool for tracking this information is the IndyGo Call Center Language Line, which provides language assistance to customers in more than 150 languages. During 2011 and 2012, the Language Line was used to provide assistance to 286 customers in Spanish, one customer in Portuguese, and two customers in Mandarin.

Additionally, The IndyGo Call Center staffs at least one English-Spanish bilingual representative at either full- or part-time status. During 2011 and 2012, the call center handled 285 customer contacts in Spanish.

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

Many LEP persons rely on public transportation for their mobility needs. According to U.S. Department of Transportation LEP guidance, "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."

According to data from the American Community Survey, of the population within the IndyGo service area who use public transportation to commute to work, approximately 7 percent are classified as LEP persons. The majority of this group (83 percent) speaks primarily Spanish.

(4) The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.

The principal resources available to IndyGo for LEP outreach are the IndyGo website and the customer service phone line. Customers visiting the website are provided with Spanish translations of vital documents, including the online comment form and the Title VI complaint procedures and complaint form. Customers contacting IndyGo through the customer service phone line have the option to have information provided in Spanish. Additionally, the IndyGo call center has access to a language line providing interpretation services in more than 150 languages.

IndyGo also has partnerships with Exodus Refugees and Catholic Charities. IndyGo provides travel training at each organization to both clients and case workers. When the clients are LEP, the organizations assist by providing interpreters to help with the training sessions.

Language Assistance Strategies

Based on the four-factor analysis above, the most predominant language spoken by LEP persons is Spanish. Because of this, IndyGo focuses the majority of its language assistance

on Spanish-speaking customers. Language assistance for other languages is typically provided on an as-needed basis.

IndyGo employs a variety of strategies to provide language assistance to LEP persons:

- IndyGo monitors staff interaction with LEP persons in order to identify potential areas
 of need for language assistance.
- IndyGo's call center consistently staffs at least one bilingual (Spanish/English) representative to give information and take complaints and comments. Additionally, LEP customers who call into IndyGo customer service are given access to the Language Line, which provides important information in more than 150 languages.
- Spanish translations of key rider materials such as route and system maps, rider guidelines, and schedules are provided to customers.
- Before public meetings and hearings, IndyGo posts advertisements in both English and Spanish to encourage LEP participation. Advertisements are also placed in a local Spanish-language publication, La Voz de Indiana.
- IndyGo provides a Spanish translation of its website, including a translation of the online comment form.
- IndyGo service and schedule information is available on Google Transit, which supports the translation of information into many non-English languages. Additionally, IndyGo also provides Spanish instructions on how to use Google Transit.
- IndyGo will provide translations of all public documents and meeting materials upon request. These translations are available in more than 50 languages.
- Special on-board audio and print announcements are utilized to alert customers of upcoming service changes, important safety messages and opportunities for public input. Announcements are recorded in both English and Spanish.

LEP Outreach

IndyGo employs multiple measures for ensuring that LEP persons are made aware that language assistance services are available. As mentioned previously, the IndyGo website and the customer service phone line provide language assistance through the translation of vital materials.

The principal resources available to IndyGo for LEP outreach are the IndyGo website and the customer service phone line. Customers visiting the website have the option of translating key parts of the website, including the online comment form, into Spanish. Customers contacting IndyGo through the customer service phone line have the option to have information provided in Spanish. The IndyGo call center has access to a language line providing interpretation services in more than 150 languages.

IndyGo advertises in a bi-weekly local Spanish-language publication, La Voz de Indiana. Also, in advance of public meetings, IndyGo provides Spanish bus announcements and displays Spanish translations of the meeting announcements on transit vehicles.

Employee Training

According to LEP guidance provided by the USDOT, "Staff members should know their obligations to provide meaningful access to information and services for LEP persons, and all employees in public contact positions should be properly trained."

For IndyGo employees who are likely to encounter LEP persons during the course of their work, education about IndyGo's LEP policies are included as part of their new employee orientation. All employees are made aware of the LAP document and their responsibilities to ensuring the requirements set forth in this plan are met. Employees are also encouraged to review the FTA PowerPoint presentation titled, Providing Language Access to Persons with Limited English Proficiency and Low Literacy." Additional LEP training is given to employees on a case by case basis based on employee, supervisor, and customer feedback.

Safe Harbor Provision

The Safe Harbor Provision is a concept which the DOT has adopted from the Department of Justice (DOJ). It states that, "if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations."

Table 1 below summarizes the language groups meeting these criteria for all population within the IndyGo service area based on information from the American Community Survey. None of the language groups account for more than 5 percent of the service area population, but rather meet the 1,000 person minimum. An additional language group, "African Languages," has a population of 1,024. Data is not available for these individual languages. However, since this is a combination of several languages, it is unlikely that any single language in this group meets the criteria alone.

Table 1. Language Spoken at Home and Ability to Speak English for Select Languages

	Total Population	Speak English "Very Well"	Speak English Less Than "Very Well"	Percent of Total Population that Speak English Less Than "Very Well"
Spanish or Spanish Creole	65,814	27,482	38,332	4.6%
Chinese	3,167	836	2,331	0.3%
French (incl. Patois, Cajun)	3,493	2,308	1,185	0.1%
Total Population	829,685	779,888	49,797	6.0%

¹www.fta.dot.gov/documents/LEPpresentation.ppt

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While this tabulation shows the total population within the IndyGo service area, it is not representative of the population that is likely to be encountered. According to American Community Survey data, the total number of persons who speak English less than "very well" and use public transportation as their means of transportation to work numbers only 530. Because of this, IndyGo has determined that the translation of vital documents into Chinese and French is not as effective for providing language assistance as other strategies previously mentioned.

As noted in the four-factor analysis and shown in the table above, Spanish is the predominant language spoken by LEP persons. IndyGo will continue to translate vital documents into Spanish to the encourage participation of LEP persons.

Monitoring and Updating the Language Assistance Plan

IndyGo conducts ongoing internal monitoring of its language assistance practices to ensure that the strategies employed remain effective. This is accomplished partially through feedback from customers and IndyGo staff who are in frequent contact with LEP persons. If any aspects of the current plan are found to be ineffective, they will be revised or replaced with more suitable strategies.

Additionally, as additional technologies and strategies for language assistance become available, IndyGo will assess the viability and cost-effectiveness of implementing such measures.

Subrecipient Monitoring

Title VI Compliance -- Information for Subrecipients

What is Title VI?

Title VI of the Civil Rights Act of 1964 addressed discrimination in most areas of public life in the United States. Title VI states: "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance." Title VI is important because it ensures that public services, including transportation, are provided in a non-discriminatory manner.

How does Title VI affect IndyGo?

The U.S. Department of Transportation (DOT) regulations implementing Title VI requires the collection of data and other information to enforce the statute. Further, the Federal Transit Administration (FTA) as part of DOT has established a program of grantee reviews assessing compliance with all Title VI regulations. The review includes an evaluation of each agency's policies, procedures and recordkeeping. IndyGo must ensure to FTA that federally supported transit services and related benefits are distributed in an equitable manner with no discrimination on the grounds of race, color or national origin. Since IndyGo supports its grantees with federal funds, IndyGo must ensure that all subrecipients also comply with the applicable parts of Title VI. Noncompliance with Title VI can cause federal funding to be conditioned or withheld.

How will IndyGo assist subrecipients?

IndyGo will inform all subrecipients about Title VI requirements in writing and provide sample materials such as a sample complaint form and sample Title VI public notice. Comprehensive Title VI training for subrecipients will coincide with the annual "call for projects" meeting. IndyGo's Title VI Program documentation will also be provided to all subrecipients.

How will IndyGo monitor subrecipients?

Subrecipients will submit their Title VI Program documentation to IndyGo. All Title VI Program documentation will be due from subrecipients in 2014. The IndyGo Director of Compliance and Civil Rights will complete a compliance review of each subrecipient and issue a review letter advising the subrecipient that they are either in compliance or that follow up is needed. Subrecipients are also monitored for Title VI compliance during site visits. All subrecipients annually complete the FTA-required Title VI certifications and assurances as well. In addition, IndyGo monitors subrecipients by requiring Title VI complaint reports and a summary of public outreach and involvement activities on an annual basis. IndyGo will provide templates for report submissions where appropriate.

Resources for subrecipients:

- ° Title VI Circular 4702.1B "Title VI Requirements and Guidelines for FTA Recipients"
- ° FTA's Title VI homepage http://www.fta.dot.gov/civilrights/12328.html
- ° FTA's Civil Rights Training Materials http://www.fta.dot.gov/civilrights/12885.html

SAMPLE TITLE VI COMPLAINT FORM

(from FTA Circular C 4702.1B)

Background

Recipients must create and make available a Title VI Complaint Form for use by customers who wish to file a Title VI complaint. The complaint form shall be available on the recipient's website. A recipient's Title VI Complaint Form shall specify the three classes protected by Title VI—race, color, and national origin—and allow the complainant to select one or more of those protected classes as the basis/bases for discrimination. The Title VI Complaint Form is a vital document. If any of the Limited English Proficient (LEP) populations in your service area meet the Safe Harbor threshold (see Chapter III), then the procedure should be provided in English and in any other language(s) spoken by LEP populations that meet the Safe Harbor Threshold.

The sample below is provided for the purposes of guidance only.

Section I:				
Name:				
Address:				
Telephone (Home):		Telephone	(Work):	
Electronic Mail Address	S:			
Accessible Format	Large Print		Audio Tape	
Requirements?	TDD		Other	
Section II:				
Are you filing this com	plaint on your own behalf?		Yes*	No
*If you answered "yes"	to this question, go to Sec	tion III.	1	
If not, please supply the for whom you are comp	name and relationship of laining:	the person		
Please explain why you	have filed for a third party	7:		
	have obtained the permiss re filing on behalf of a thir		Yes	No
Section III:				
I believe the discriminat	tion I experienced was bas	ed on (check a	all that apply):	
[]Race [] Color	[] National	Origin	
Date of Alleged Discrin	nination (Month, Day, Yea	r):		
against. Describe all per	ssible what happened and sons who were involved. I minated against you (if kn	include the na	me and contact info	rmation of

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Have you previously filed a Title VI cor agency?	nplaint with this	Yes	No
Section V		1	
Have you filed this complaint with any or State court?	other Federal, State, or I	local agency, or w	ith any Fed
[] Yes [] No			
If yes, check all that apply:			
[] Federal Agency:			
[] Federal Court		gency	
[] State Court	[] Local A	gency	
Please provide information about a cont filed.	act person at the agency	//court where the	complaint w
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 complaint.	other information that y	ou think is releva	nt to your
Signature and date required below			

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SAMPLE TITLE VI COMPLAINT PROCEDURE

(from FTA Circular C 4702.1B)

Background

Recipients' Title VI Programs must include a copy of the agency's Title VI complaint procedure. The complaint procedure and complaint form shall be available on the recipient's website. The Title VI Complaint Procedure is a vital document. If any of the Limited English Proficient (LEP) populations in your service area meet the Safe Harbor threshold (see Chapter III), then the complaint procedure should be provided in English and in any other language(s) spoken by LEP populations that meet the Safe Harbor Threshold. At a minimum, the complaint procedure should include a notice—"If information is needed in another language, then contact [phone number]"—should be stated in English and in any other language(s) spoken by LEP populations that meet the Safe Harbor threshold.

The sample below is provided for the purposes of guidance only.

SAMPLE Title VI Complaint Procedure

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the City of USA Transit Authority (hereinafter referred to as "the Authority") may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. The City of USA Transit Authority investigates complaints received no more than 180 days after the alleged incident. The Authority will process complaints that are complete.

Once the complaint is received, the Authority will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

The Authority has XX days to investigate the complaint. If more information is needed to resolve the case, the Authority may contact the complainant. The complainant has XX 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 XX business days, the Authority can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two 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. An 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, she/he has XX days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

SAMPLE NOTICE TO THE PUBLIC

(from FTA Circular C 4702.1B)

Background: A Title VI Notice to the Public must be displayed to inform a recipient's customers of their rights under Title VI. At a minimum, recipients must post the notice on the agency's website and in public areas of the agency's office(s), including the reception desk, meeting rooms, etc. Many agencies display their Title VI Notices in transit facilities (e.g. – headquarters, transit shelters and stations, etc.) and on transit vehicles (e.g. – buses, rail cars, etc.). The Title VI Notice is a vital document. If any of the Limited English Proficiency (LEP) populations in your service area meet the Safe Harbor Threshold, then the Notice should be provided in English and in any other language(s) spoken by LEP populations that meet the Safe Harbor Threshold. At a minimum, this statement in the Notice – "If information is needed in another language, then contact [phone number]" – should be stated in English and in any other language(s) spoken by LEP populations that meet the Safe Harbor Threshold.

The sample Title VI Notice below is provided for the purposes of guidance only:

Notifying the Public of Rights Under Title VI THE CITY OF USA

- The City of USA 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 City of USA.
- For more information on the City of USA's civil rights program, and the
 procedures to file a complaint, contact 800-555-1212, (TTY 800-5551111); email title.vi.complaint@city.ca.us; or visit our administrative
 office at 1234 Center Street, City of USA, State 11111. For more
 information, visit www.city.ca.us
- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590
- If information is needed in another language, contact 800-555-1212.
 - MAKE SURE THE SENTENCE ABOVE IS ALSO PROVIDED IN ANY LANGUAGE(S) SPOKEN BY LEP POPULATIONS THAT MEET THE SAFE HARBOR THRESHOLD

TITLE VI COMPLAINT PROCEDURE

Any person who believes she or he has been discriminated against on the basis of race, color or national origin by the **Indianapolis Public Transportation Corporation (IPTC)** may file a Title VI complaint by completing and submitting the corporation's Title VI Complaint Form by mail or fax to the attention of the Director of Compliance and Civil Rights. IPTC investigates complaints received no more than 180 days after the alleged incident. IPTC will only process complaints that are complete. Complaint forms may be found on the IPTC website or by calling the IndyGo Customer Service Call Center.

Once the complaint is received, IPTC will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

IPTC has 60 days to investigate the complaint. If more information is needed to resolve the case, IPTC may contact the complainant. The complainant has 10 business days from the date of the request letter to send the information to the Director of Compliance and Civil Rights. If the Director of Compliance and Civil Rights is not contacted by the complainant or does not receive the additional information within 10 business days, IPTC can administratively close the case. A case may also be administratively closed if the complainant no longer wishes to pursue his or her case.

After the Director of Compliance and Civil Rights reviews the complaint, she/he will issue one of two 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. An LOF summarizes the allegations and 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, she/he has 15 days after the date of the closure letter or LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration (FTA):

FTA Office of Civil Rights Attn: Title VI Program Coordinator East Building 1200 New Jersey Avenue SE Washington, DC 20590.

If information is needed in another language, call the IndyGo Customer Service Call Center at 317-635-3344.

Si se necesita información en otro idioma, llame al 317-635-3344.

Title VI Program Checklist

Each subrecipient is required to submit the following information to the Indianapolis Public Transportation Corporation (IPTC):

GENERAL REQUIREMENTS

All subrecipients must submit:
Title VI Notice to the Public, including a list of locations where the notice is posted
Title VI Complaint Procedures (e.g. – instructions to the public regarding how to file a
Title VI discrimination complaint)
Title VI Complaint Form
List of transit-related Title VI investigations, complaints and lawsuits
Public Participation Plan, including information about outreach methods to engage
minority and limited English proficiency (LEP) populations, as well as a summary of outreach efforts made since the last Title VI Program submission
Language Assistance Plan for providing language assistance to persons with limited English proficiency, based on the DOT LEP Guidance
A table depicting the membership of any non-elected committees and councils, the
membership of which is selected by the subrecipient, broken down by race, and a
description of the process the agency uses to encourage participation of minorities on
such committees
A Title VI equity analysis, IF the recipient has constructed a facility, such as a vehicle
storage facility, maintenance facility, operation center, etc.
A copy of board meeting minutes, resolution, or other appropriate documentation
showing the board of directors or appropriate governing entity or official(s) responsible
for policy decisions reviewed and approved the Title VI Program. The approval must
occur prior to submission to IPTC.
REQUIREMENTS OF TRANSIT PROVIDERS
All fixed route transit providers must submit:
All requirements set out under GENERAL REQUIREMENTS (above)
Service standards
Vehicle load for each mode
Vehicle headway for each mode
On time performance for each mode
Service availability for each mode
Service policies
Transit amenities for each mode
Vehicle assignment for each mode

Transit providers that operate 50 or more fixed route vehicles in peak service and are located in an
Urbanized Area (UZA) of 200,000 or more people must submit:
Demographic and service profile maps and charts
Demographic ridership and travel patterns, collected by surveys
Results of their monitoring program and report, including evidence that the board or
other governing entity or official(s) considered, was aware of the results, and approved the analysis
A description of the public engagement process for setting the "major service change
policy," disparate impact policy and disproportionate burden policy
Results of service and/or fare equity analyses conducted since the last Title VI Program
submission, including evidence that the board or other governing entity or official(s)
considered, was aware of, and approved the results of the analysis
DECHIDEMENTS OF MDO
REQUIREMENTS OF MPOs Motornolitan Planning Organizations and other planning ontities must submit
Metropolitan Planning Organizations and other planning entities must submit:
All requirements set out under GENERAL REQUIREMENTS (above)
All requirements set out under REQUIREMENTS OF TRANSIT PROVIDERS (above) if the
MPO is a provider of fixed route public transportation
Demographic profile of the metropolitan area
A description of the procedures by which the mobility needs of minority populations are
identified and considered within the planning process
Demographic maps that show the impacts of the distribution of State and Federal funds in the aggregate for public transportation projects
Analysis of the MPO's transportation system investments that identifies and addresses
any disparate impacts
Description of the procedures the agency uses to ensure nondiscriminatory pass-
through of FTA financial assistance (if requested)
Description of the procedures the agency uses to provide assistance to potential
subrecipients in a nondiscriminatory manner (if requested)

IPTC JARC & NEW FREEDOM SITE VISIT CHECK LIST

Subr	recipient	Date	
Revi	iewer Initials		
I.	VEHICLE PROCUREMENT Process used (Bid, State QPA, etc) & document review Solicitation notices (if applicable) Vendor response(s) Other		
II.	VEHICLE MAINTENANCE Policies Provider Records review sample (e.g. inspection sheets, mainten Other	ance logs)	
III.	VEHICLE OPERATION Operational policies/procedures Operator driver licenses & training Drug/alcohol policies Fare revenue Trip log sheets Other		
IV.	VEHICLE INSPECTION Fleet storage VIN # verification, Year, Make & Model Accessibility equipment Condition: External & Internal Mileage Other		
V.	FINANCIAL REVIEW accounting capacity/experience (internal staffing or out A133 audit requirement Financial Statement (e.g. local share documentation) Audit Report Review (most recent) Other	tsourcing)	
VI.	CLAIMS PROCESS REVIEW Claims process review Claims review (inc. sampling reimbursement claims sub Tier review and determination Other	mitted)	
VII.	COMPLIANCE REVIEW		
	Certifications & Assurances Title VI		

Service Monitoring Report

Title VI Service Monitoring

Evaluation of Equitable Compliance with System-Wide Standards and Policies

Indianapolis Public Transportation Corporation



June 2013

SRF No. 01308074

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Introduction

In order to comply with Federal Transit Administration (FTA) Title VI guidelines, federal funding recipients are required to adopt system-wide standards and policies to guard against discriminatory service design and operations decisions. The FTA requires transit providers to monitor service standards at least once every three years. The primary purpose of this Title VI Service Monitoring Evaluation is to compare the level and quality of service provided to minority and low-income populations to the level and quality of service provided to non-minority and non-low-income populations, respectively.

The FTA requires agencies to adopt service standards and policies for six specific areas: vehicle load, vehicle headway, on-time performance, service availability, distribution of transit amenities, and vehicle assignment. This review compares the rate of compliance with these service measures between minority routes and non-minority routes, and between low-income routes and non-low-income routes.

Title VI and Environmental Justice

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs receiving federal financial assistance. Title VI states that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

In 1994, President Clinton issued Executive Order 12898, which states that each federal agency "shall make achieving environmental justice part of its mission by identifying and addressing disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations."

To that end, the FTA issued Circular 4702.1B in 2012, which replaced Circular 4702.1A, issued in 2007. This document outlines Title VI and Environmental Justice compliance procedures for recipients of FTA-administered transit program funds. Specifically, the FTA requires recipients, including the Indianapolis Public Transportation Corporation (IndyGo), to "monitor the performance of their transit system relative to their system-side service standards and service policies no less than every three years." This evaluation fulfills this requirement as it relates to IndyGo's 2013 Title VI Program submittal.

Title VI Principles and Definitions

Disparate Impact and Disproportionate Burden

Under the new FTA guidelines, transit providers are required to define their own thresholds to determine when disparate impacts and disproportionate burdens exist as a result of a major service change. "Disparate impact" refers to a facially neutral policy or practice that disproportionately impacts members of a group identified by race, color, or national origin. "Disproportionate burden" refers to a neutral policy or practice that disproportionately impacts low-income populations compared to non-low-income populations.

IndyGo is currently undergoing a public engagement process to define these thresholds. The proposed disparate impact and disproportionate burden policies are as follows:

Disparate Impact Policy

Disparate impact policies apply to minority populations, as defined by the FTA. A determination of disparate impact shall be made if the effects of a major service change borne by the minority population, both adverse and beneficial, are not within 20 percent of the effects borne by the non-minority population.

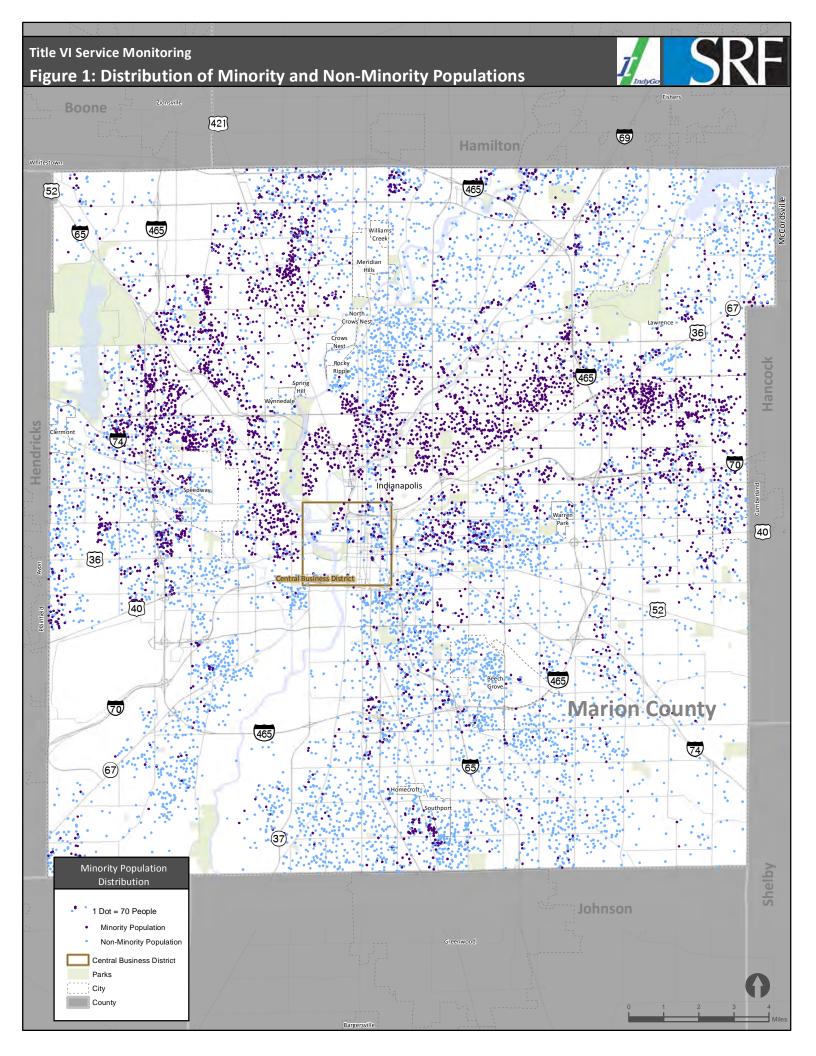
Disproportionate Burden Policy

Disproportionate burden policies apply to low-income populations, as defined by the FTA. A determination of disproportionate burden shall be made if the effects of a major service change borne by the low-income population, both adverse and beneficial, are not within 20 percent of the effects borne by the non-low-income population.

While the proposed policy noted above deals specifically with Service Equity Analysis, the same approach will be applied to the Service Monitoring Evaluation. In this evaluation, if the quantitative results indicate that the minority route compliance with the service standards and policies is not within 20 percent of the compliance for non-minority routes, there may be evidence of disparate impacts. Similarly, if the quantitative results indicate that the low-income route compliance with the service standards and policies is not within 20 percent of the compliance for non-low-income routes, there may be evidence of disproportionate burdens.

Minority

The FTA defines a minority person as one who self-identifies as American Indian/Alaska Native, Asian, Black or African American, Hispanic or Latino, and/or Native Hawaiian/Pacific Islander. For the purposes of this evaluation, minority persons are defined as those who self-identify as non-White/Caucasian and/or Hispanic. The distribution of minority and non-minority populations within the IndyGo service area is shown in Figure 1.



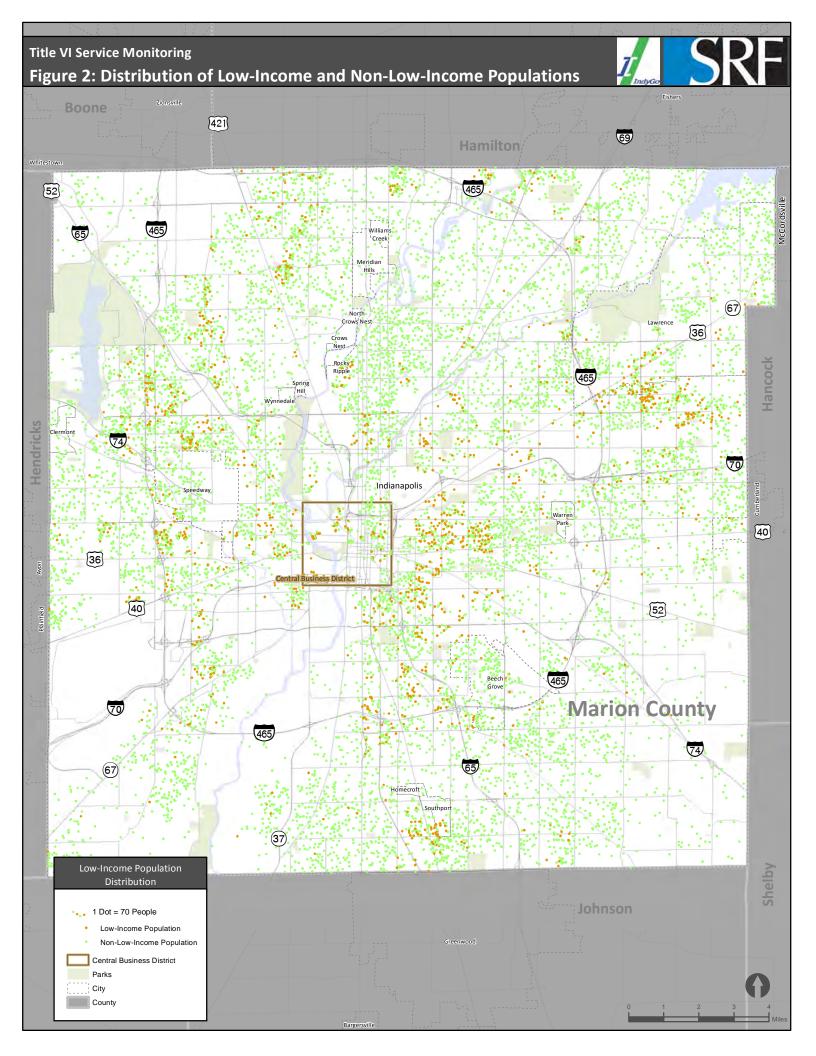
Low-Income

While low-income populations are not an explicitly protected class under Title VI, the FTA recognizes the inherent overlap between Title VI and Environmental Justice principles. Subsequently, it requires transit providers to evaluate the impact of service and fare changes to low-income populations, and to identify any disproportionate burden placed on those populations by the proposed changes. The FTA defines a low-income person as one whose annual household income is at or below the poverty guidelines set by the Department of Health and Human Services (DHHS). DHHS poverty thresholds are based on household size and the number of related children less than 18 years of age. The 2011 poverty thresholds used for the data in this evaluation are summarized in Table 1. The distribution of low-income and non-low-income populations within the IndyGo service area is shown in Figure 2.

Table 1. 2011 DHHS Poverty Thresholds

Persons in Family	Threshold for 48 Contiguous States and D.C.
1	\$10,890
2	\$14,710
3	\$18,530
4	\$22,350
5	\$26,170
6	\$29,990
7	\$33,810
8	\$37,630
For each additional person, add	\$3,820

Source: U.S. Department of Health and Human Services (http://aspe.hhs.gov/poverty/11poverty.shtml)

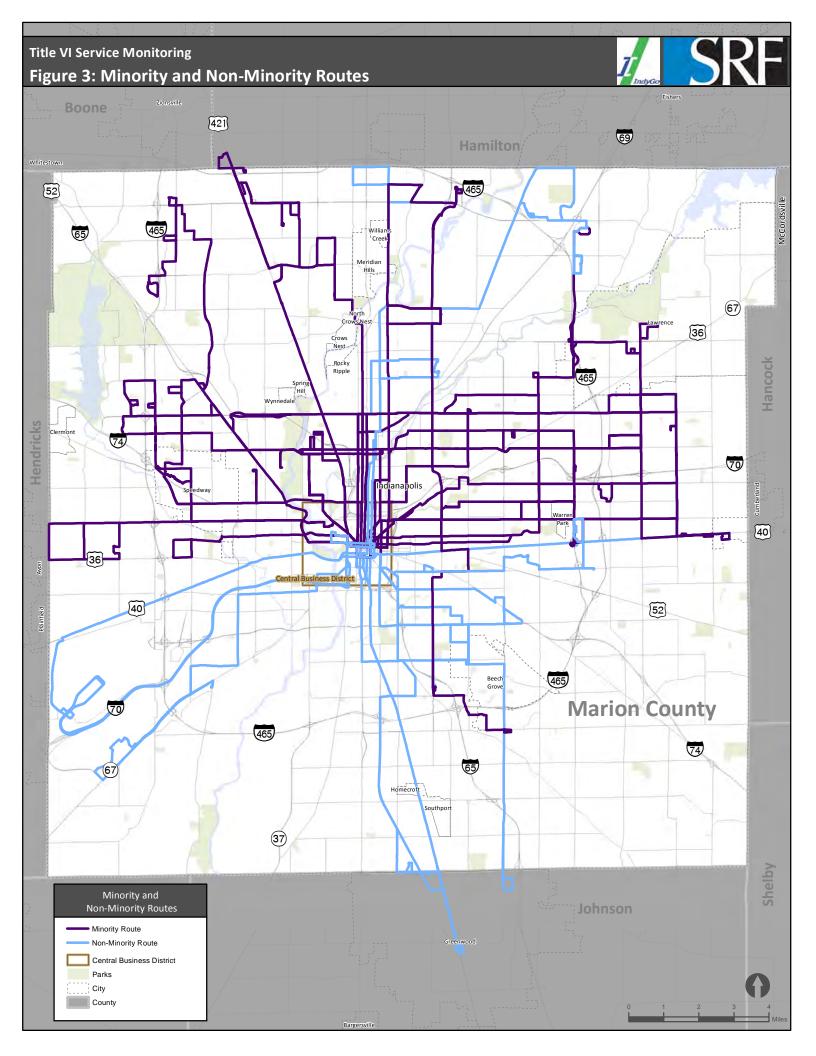


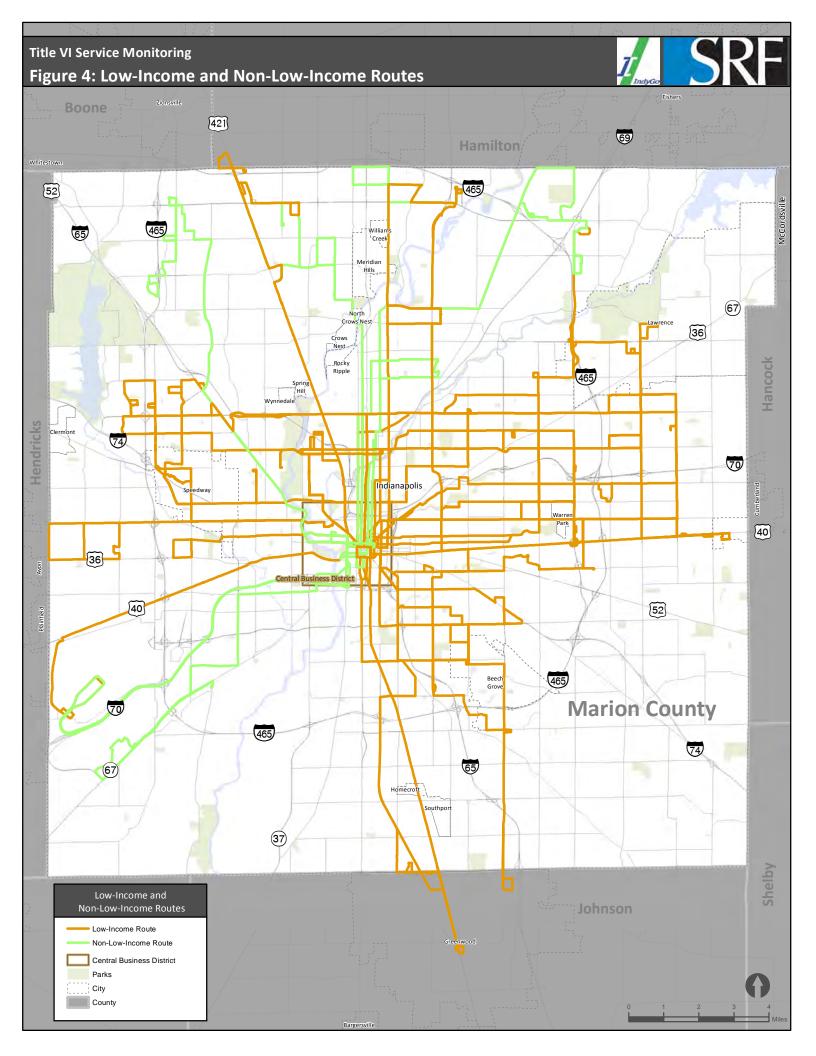
Minority and Low-Income Route Designation

To classify each route as either a minority route or non-minority route and as either a low-income route or non-low-income route, a quarter-mile buffer was generated around each route alignment. A route was classified as a minority route if more than one third of the coverage area of the route intersected with census blocks with a percentage of minority population exceeding the service area average. A route was classified as a low-income route if more than one third of the coverage area of the route intersected with census blocks with a percentage of low-income population exceeding the service area average. The minority or low-income designation for each route is summarized in Table 2. The locations of minority and non-minority routes are shown in Figure 3. The locations of low-income and non-low-income routes are shown in Figure 4.

Table 2. Minority and Low-Income Route Designation

Route	Minority Route Status	Low-Income Route Status
2	Minority Route	Low-Income Route
3	Minority Route	Low-Income Route
4	Minority Route	Low-Income Route
5	Minority Route	Low-Income Route
8	Non-Minority Route	Low-Income Route
10	Minority Route	Low-Income Route
11	Minority Route	Low-Income Route
12	Non-Minority Route	Low-Income Route
13	Non-Minority Route	Low-Income Route
14	Non-Minority Route	Low-Income Route
15	Minority Route	Low-Income Route
16	Non-Minority Route	Low-Income Route
17	Minority Route	Low-Income Route
18	Non-Minority Route	Non-Low-Income Route
19	Non-Minority Route	Non-Low-Income Route
21	Minority Route	Low-Income Route
22	Non-Minority Route	Low-Income Route
24	Non-Minority Route	Non-Low-Income Route
25	Minority Route	Low-Income Route
26	Minority Route	Low-Income Route
28	Minority Route	Non-Low-Income Route
30	Minority Route	Low-Income Route
31	Non-Minority Route	Low-Income Route
34	Minority Route	Low-Income Route
37	Minority Route	Non-Low-Income Route
38	Minority Route	Low-Income Route
39	Minority Route	Low-Income Route
50	Non-Minority Route	Non-Low-Income Route
55	Non-Minority Route	Low-Income Route
87	Minority Route	Low-Income Route
205	Non-Minority Route	Non-Low-Income Route





Service Monitoring Analysis

In compliance with the current FTA Circular, IndyGo has defined service standards and policies for six key areas, including vehicle load, vehicle headway, on-time performance, service availability, distribution of transit amenities, and vehicle assignment. For each service standard or policy, the rate of compliance was compared between minority and non-minority routes and between low-income and non-low-income routes.

The IndyGo disparate impact and disproportionate burden policies were used to assess the equitable distribution of the service. If the rate of compliance for any given service standard or policy on minority routes was not within 20 percent of the rate of compliance for non-minority routes, this was identified as a potential disparate impact and additional analysis was pursued. Likewise, additional analysis was triggered if the rate of compliance for low-income routes was not within 20 percent of the rate of compliance for non-low-income routes.

Vehicle Load

IndyGo's service standard for vehicle load is a maximum peak load factor of 1.25 and a maximum off-peak load factor of 1.00. Load factor is defined as the number of passengers on a bus divided by the number of seats available. IndyGo's peak periods are defined as weekdays between 6:00 a.m. and 9:00 a.m. and between 3:00 p.m. and 6:00 p.m.

This evaluation reviewed bus trips between June 10, 2012 and October 15, 2012. For each trip, the maximum load factor was calculated using the maximum passenger load and the number of seats available on the bus assigned to the trip. The peak and off-peak standards were applied to each trip based on the trip start time. The percent of trips meeting the vehicle load standards are summarized in Table 3 below.

Table 3. Vehicle Load Compliance

Route Type	Percent of Trips Meeting Vehicle Load Standard	Acceptable Range
Minority Route	88.3%	73.4% - 100%
Non-Minority Route	91.7%	-
Low-Income Route	89.0%	73.2% - 100%
Non-Low-Income Route	91.6%	73.2% - 100%

On average, 89.5 percent of all trips adhere to the vehicle load standards. For minority routes, 88.3 percent of trips adhere to the vehicle load standards compared to 91.7 percent of trips on non-minority routes. The rate of compliance for minority routes is 3.4 percent

lower than the rate of compliance for non-minority routes, which is within the acceptable range. This review finds no disparate impacts to minority populations in regard to vehicle load standards.

For low-income routes, 89.0 percent of trips adhere to the vehicle load standards compared to 91.6 percent of non-low-income routes. The rate of compliance for low-income routes is 2.6 percent lower than the rate of compliance for non-low-income routes, which is within the acceptable range. This review finds no disproportionate burdens to low-income populations in regard to vehicle load standards.

Vehicle Headway

IndyGo's service standard for vehicle headway is 30 minutes or less during peak periods and 60 minutes or less during off-peak periods.

This analysis used the posted IndyGo route schedules for spring 2013 to calculate the average time between bus arrivals at each scheduled timepoint. To eliminate skewing from timepoints that do not warrant consistently frequent service throughout the day, vehicle headways in excess of 120 minutes were excluded from the analysis. The average vehicle headways at scheduled timepoints for peak and off-peak periods are summarized in Table 4 for each route type.

Table 4. Vehicle Headway Compliance

Route Type	Average Peak Headway	Acceptable Range	Average Off- Peak Headway	Acceptable Headway
Minority Route	32.1	26.6 - 39.9	46.4	39.5 - 59.2
Non-Minority Route	33.3	-	49.4	-
Low-Income Route	32.0	27.8 - 41.8	45.6	45.6 - 68.4
Non-Low-Income Route	34.8	-	57.0	-
All Routes	32.5	-	47.3	-

The average vehicle headway for all routes is 32.5 minutes between buses in the peak period and 47.3 minutes between buses in the off-peak period. The average peak and off-peak vehicle headways for minority routes are 32.1 and 46.4 minutes compared to 33.3 and 49.4 minutes for non-minority routes. The average peak headway for minority routes is 1.2 minutes less than the average for non-minority routes and is within the acceptable range. This average off-peak headway for minority routes is 3.0 minutes less that the average for non-minority routes and is within the acceptable range. This review finds no disparate impacts to minority populations in regard to vehicle headway standards.

The low-income route peak and off-peak average vehicle headways are 32.0 and 45.6 minutes compared to 34.8 and 57.0 minutes for non-low-income routes. The average peak

headway for low-income routes is 2.8 minutes less than non-low-income routes and is within the acceptable range. This average off-peak headway for low-income routes is 11.4 minutes less than the non-low-income routes and is within the acceptable range. This review finds no disproportionate burdens to low-income populations in regard to vehicle headway standards.

On-Time Performance

IndyGo measures the on-time performance of its buses at set timepoints along each route. IndyGo defines a bus arrival as on-time if it arrives at a timepoint no more than one minute earlier or five minutes later than the scheduled arrival time. IndyGo's service standard is for 90 percent of bus timepoint arrivals to be on-time.

This evaluation reviewed bus trips between June 10, 2012 and October 15, 2012. Automatic Vehicle Locater (AVL) data was used to calculate the average percentage of early, late, and on-time timepoint arrivals for each route type. The on-time performance results are summarized in Table 5.

Table 5. On-Time Performance

Route Type	Early Arrival at Timepoint	Late Arrival at Timepoint	On-Time Arrival at Timepoint	Acceptable Range
Minority Route	3.4%	25.8%	70.8%	59.8% - 89.7%
Non-Minority Route	4.3%	21.0%	74.7%	-
Low-Income Route	3.5%	24.7%	71.8%	58.8% - 88.3%
Non-Low-Income Route	4.6%	21.8%	73.6%	-
All Routes	3.7%	24.2%	72.1%	-

On average, 72.1 percent of all timepoint arrivals were on-time. For minority routes, 70.8 percent of timepoint arrivals were on-time compared to 74.7 percent for non-minority routes. The percent of on-time timepoint arrivals for minority routes is 3.9 percentage points lower than for non-minority routes, which is within the acceptable range. This review finds no disparate impacts to minority populations in regard to on-time performance standards.

For low-income routes, 71.8 percent of timepoints were arrived at on-time compared to 73.6 percent of timepoints for non-low-income routes. The percent of on-time timepoint arrivals for low-income routes is 1.8 percentage points lower than for non-low-income routes, which is within the acceptable range. This review finds no disproportionate burdens to low-income populations in regard to on-time performance standards.

Service Availability

IndyGo's service standard for service availability is for 80 percent of the service area population to be located within three-quarter miles of transit service. For the purposes of this analysis, the IndyGo service area was defined as all area within the extent of Marion County.

This analysis used the spring 2013 configuration of IndyGo routes to evaluate service availability. Using geographic information systems (GIS) software, a three-quarter mile buffer was generated around each route. All Marion County census blocks with a centroid located within this buffer were considered to have service available. Using the demographic information of each census block¹, the percentage of each population group within the service area with service available was calculated. Service availability information is summarized in Table 6.

Table 6. Service Availability

Route Type	Percent of Population Within 3/4 Miles of Transit Service	Acceptable Range
Minority Route	86.5%	56.9% - 85.3%
Non-Minority Route	71.1%	-
Low-Income Route	90.6%	59.4% - 89.1%
Non-Low-Income Route	74.2%	-
All Routes	77.2%	-

On average, 77.2 percent of the service area population is served by transit. For minority populations, 86.5 percent is served by transit compared to 71.1 percent of non-minority populations. The proportion of minority population served is 15.4 percentage points higher than the proportion of non-minority population served and is not within the acceptable range.

For low-income population, 90.6 percent is served by transit compared to 74.2 percent of non-low-income population. The proportion of low-income population is 16.4 percentage points higher than the proportion of non-low-income population served and is not within the acceptable range.

While these results are higher than the acceptable range as defined by a strict application of the disparate impact policy, this outcome is a clear result of IndyGo's stated focus on

¹ 2010 U.S. Decennial Census data was used for total population and minority population counts. Low-income population counts were estimated by applying the block-group level low-income population proportions from the American Community Survey 2011 5-year estimates to the 2010 U.S. Decennial Census total population counts.

providing service to the urban core and on key high-density arterial corridors which typically exhibit higher proportions of minority and low-income populations than the service area as a whole. As such, this evaluation finds no disparate impacts to minority populations, nor does it find disproportionate burdens to low-income populations, in regard to service availability.

Distribution of Transit Amenities

IndyGo's service policy is for transit amenities to be distributed equitably throughout the system. Transit amenities include shelters, benches, informational displays, and trash cans. IndyGo does not currently have specific siting policies for individual amenity types.

To evaluate the distribution of amenities, this analysis first classified each bus stop by route type. If a stop was served only by minority routes, it was classified as a minority stop. Likewise, if a stop was served only my non-minority routes, it was classified as a non-minority stop. In cases where both minority and non-minority routes served a stop, the stop was classified as "both." An identical approach was used to classify each stop as low-income, non-low-income, or both. The percent of stops with each amenity was then calculated for each route type. It should be noted that the stops classified as "both" were included in the calculation of each route type. For example, in Table 7 below, the percent of minority stops with shelters was calculated as: (38 + 129) / (272 + 2,428) = 6.2 percent.

The percentage of stops with each amenity is shown for each route type in Table 7, Table 8, Table 9, and Table 10.

Table 7. Distribution of Transit Amenities - Shelters

Stop Type	No Shelter	Shelter	Total Stops	Percent with Shelter	Acceptable Range
Both	234	38	272		
Minority Stop	2,299	129	2,428	6.2%	4.9% - 7.3%
Non-Minority Stop	1,147	52	1,199	6.1%	
Both	256	45	301		
Low-Income Stop	2,837	151	2,988	6.0%	6.0% - 9.0%
Non-Low-Income Stop	587	23	610	7.5%	

For minority stops, 6.2 percent have shelters present compared to 6.1 percent of non-minority stops. The proportion of minority stops with shelters is 0.1 percentage points higher than the proportion of non-minority stops and is within the acceptable range.

For low-income stops, 6.0 percent have shelters present compared to 7.5 percent of non-low-income stops. The proportion of low-income stops with shelters is 1.5 percentage

points lower than the proportion of non-low-income stops and is within the acceptable range.

Table 8. Distribution of Transit Amenities - Benches

Stop Type	No Bench	Bench	Total Stops	Percent with Bench	Acceptable Range
Both	270	2	272		
Minority Stop	2,391	37	2,428	1.4%	0.5% - 0.8%
Non-Minority Stop	1,191	8	1,199	0.7%	
Both	298	3	301		
Low-Income Stop	2,949	39	2,988	1.3%	0.7% - 1.1%
Non-Low-Income Stop	605	5	610	0.9%	

For minority stops, 1.4 percent have benches present compared to 0.7 percent of non-minority stops. The proportion of minority stops with benches is 0.7 percentage points higher than the proportion of non-minority stops and is not within the acceptable range.

For low-income stops, 1.3 percent have benches present compared to 0.9 percent of non-low-income stops. The proportion of low-income stops with benches is 0.4 percentage points higher than the proportion of non-low-income stops and is not within the acceptable range.

Table 9. Distribution of Transit Amenities - Information Displays

Stop Type	No Display	Display	Total Stops	Percent with Display	Acceptable Range
Both	257	15	272		
Minority Stop	2,428	0	2,428	0.6%	0.9% - 1.3%
Non-Minority Stop	1,198	1	1,199	1.1%	
Both	287	14	301		
Low-Income Stop	2,986	2	2,988	0.5%	1.2% - 1.8%
Non-Low-Income Stop	610	0	610	1.5%	

For minority stops, 0.6 percent have information displays present compared to 1.1 percent of non-minority stops. The proportion of minority stops with information displays is 0.5 percentage points lower than the proportion of non-minority stops and is not within the acceptable range.

For low-income stops, 0.5 percent have information displays present compared to 1.5 percent of non-low-income stops. The proportion of low-income stops with information

displays is 1.0 percentage point lower than the proportion of non-low-income stops and is not within the acceptable range.

Table 10. Distribution of Transit Amenities - Trash Cans

Stop Type	No Trash Can	Trash Can	Total Stops	Percent with Trash Can	Acceptable Range
Both	263	9	272		
Minority Stop	2,352	76	2,428	3.1%	2.3% - 3.5%
Non-Minority Stop	1,165	34	1,199	2.9%	
Both	290	11	301		
Low-Income Stop	2,901	87	2,988	3.0%	2.8% - 4.2%
Non-Low-Income Stop	589	21	610	3.5%	

For minority stops, 3.1 percent have trash cans present compared to 2.9 percent of non-minority stops. The proportion of minority stops with trash cans is 0.2 percentage points higher than the proportion of non-minority stops and is within the acceptable range.

For low-income stops, 3.0 percent have trash cans present compared to 3.5 percent of non-low-income stops. The proportion of low-income stops with trash cans is 0.5 percentage points lower than the proportion of non-low-income stops and is within the acceptable range.

Additional Analysis: Benches and Information Displays

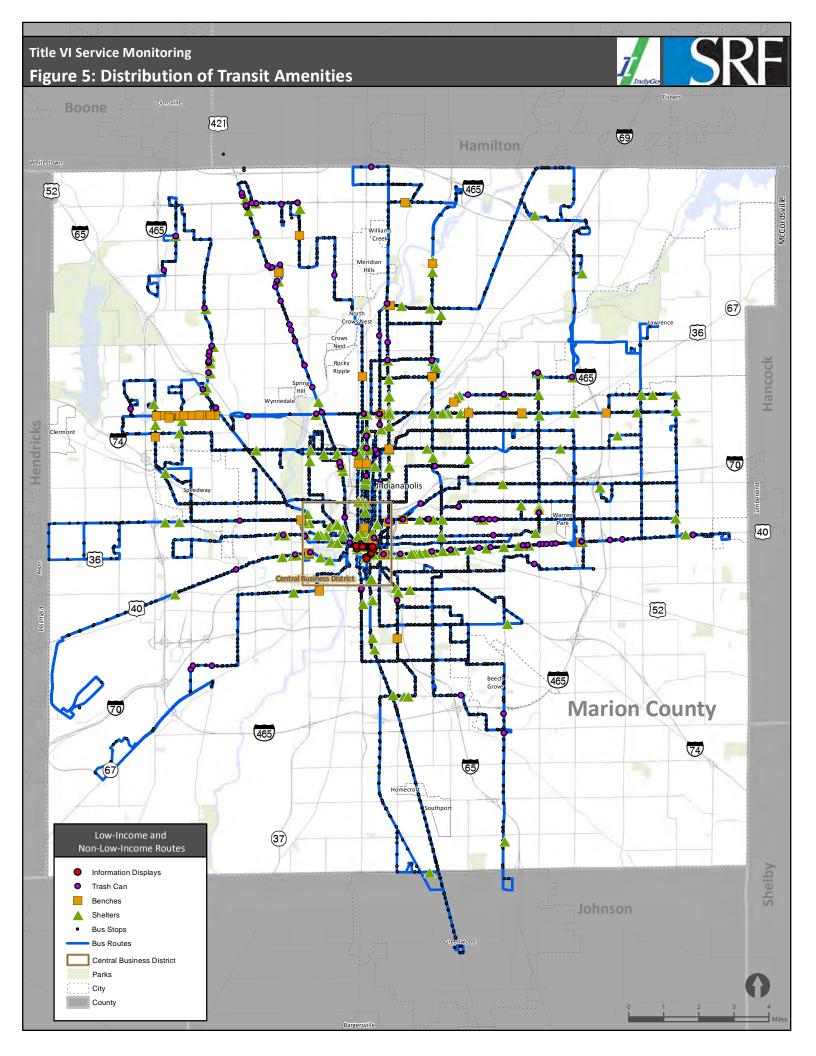
IndyGo has limited resources for implementing transit stop amenities. Investments in these amenities are prioritized based on ridership activity, existing pedestrian infrastructure, and Americans with Disabilities Act (ADA) accessibility concerns.

The results of the bench analysis are skewed by a high concentration of benches along route 38 on West 38th Street. A total of 17 of the 47 benches in the system are located in this area. Route 38 is classified as both a minority and low-income route. If these routes are excluded from the calculations, the percentage of minority stops and low-income stops with benches becomes nearly identical to the percentage of non-minority and non-low-income stops.

The primary purpose of the information displays is to provide transferring customers information about connecting routes. With limited resources available, IndyGo has limited its deployment of these displays to stops located in the downtown Indianapolis area, where the vast majority of transfers occur. It should be noted that nearly every display has been implemented at stops which serve both minority and non-minority routes as well as low-income and non-low-income routes. However, because there are a larger number of minority and low-income stops than non-minority and non-low-income stops within the system, the

calculation of the percent of stops with information displays for each route type results in significantly different figures.

While the results of the analysis for benches and information displays fall outside of the acceptable range as defined by the disparate impact policy, these outcomes are more likely a limitation of the methodology when applied to these areas than the identification of disparate impacts or disproportionate burdens. As such, this evaluation finds no disparate impacts to minority populations, nor does it find disproportionate burdens to low-income populations, in regard to the distribution of transit amenities. The distribution of transit amenities throughout the service area is shown in Figure 5.



Vehicle Assignment

IndyGo's service policy is for its transit vehicles to be assigned equitably between all routes with regard to vehicle age.

To evaluate this policy, the evaluation reviewed the vehicle assignment records for all trips between June 10, 2012 and October 15, 2012. The average age of vehicles assigned to each route type was calculated and is summarized in Table 11.

Table 11. Vehicle Assignment

Route Type	Average Age of Assigned Vehicle (Years)	Acceptable Range
Minority Route	8.9	8.1 - 12.2
Non-Minority Route	10.1	-
Low-Income Route	9.2	7.8 - 11.6
Non-Low-Income Route	9.7	-
All Routes	9.3	-

The average age of vehicles assigned to all trips was 9.3 years. For minority routes, the average age of assigned vehicles was 8.9 years compared to 10.1 years for non-minority routes. The average vehicle age for minority routes was 1.2 years less than non-minority routes, and is within the acceptable range. This review finds no disparate impacts to minority populations in regard to vehicle assignment policies.

For low-income routes, the average age of assigned vehicles was 9.2 years compared to 9.7 years for non-low-income routes. The average vehicle age for low-income routes was 0.5 years less than non-low-income routes, and is within the acceptable range. This review finds no disproportionate burdens to low-income populations in regard to vehicle assignment policies.

Summary

Under the guidance of FTA Circular 4702.1B, transit agencies must monitor their service performance against their defined standards and policies for vehicle load, vehicle headway, on-time performance, service availability, distribution of transit amenities, and vehicle assignment. The agency must compare the rate of compliance with these service measures between minority routes and non-minority routes and between low-income routes and non-low-income routes.

This comparison was made by applying IndyGo's disparate impact and disproportionate burden policies to the rates of compliance with the service standards and policies. This evaluation finds no disparate impacts to minority populations, nor does it find disproportionate burdens to low-income populations, for any of the IndyGo service standards and policies.

2009 On-Board Passenger Survey Executive Summary

2009 IndyGo On-Board Transit Survey

final report

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CHAPTER 1 EXECUTIVE SUMMARY

1.1 BACKGROUND

Bernardin Lochmueller and Associates (BLA) and NuStats conducted a system-wide on-board survey on behalf of Indianapolis Public Transportation Corporation (IndyGo). The survey was conducted on all IndyGo routes, including its fixed and express routes. A pilot survey (whose results were appropriate for inclusion in the final database of usable surveys) occurred between September 22nd and September 24th, 2009. Full-scale data collection occurred between September 28 and October 16, 2009. These efforts provided a total of 3,990 completed and usable surveys. Study tasks included designing the survey instrument; developing the sampling plan; collecting, processing, and geocoding the data; weighting and expanding the data; analyzing the data; and reporting the results. This report documents these tasks.

The objective of the survey was to analyze travel patterns, transit use, and other aspects of transportation information for IndyGo. This data will also assist in future New Starts project submittals and IndyGo's 2009 Bus Plan.

1.2 KEY FINDINGS

The analysis conducted was two-fold: (1) examine the travel behavior characteristics of IndyGo riders, and (2) examine the demographic characteristics of IndyGo riders. The survey data used for this analysis were appropriately weighted and expanded to be representative of the IndyGo ridership. Key findings of the survey include:

- Seventy-three percent of IndyGo riders are from households that have an annual income of less than \$35,000, while 5 percent come from households earning at least \$75,000.
- Fifty-two percent of riders are transit-dependent riders (i.e., they are from households that do not own a vehicle).
- Sixty-five percent of IndyGo riders are employed, with forty-four percent employed full-time.
- Home and work are the most prevalent rider trip origins and destinations.
 - Forty-eight percent of trips originate from home, while forty percent of trips end at home.
 - Twenty-six percent of trips originate from work, while thirty percent of trips end at work.
 - Forty-six percent of trips are home-based work trips, while twenty percent of trips are home-based non-work trips.
- Walking is the dominant access and egress mode for all riders. Ninety-two percent of riders access a
 bus stop "by foot". Ninety-three percent access their final destination by walking.
 - Eighty-nine percent of riders walk to access transit.
 - Ninety-one percent of riders walk after leaving transit.
- In the absence of transit service to complete their one-way trip, twenty-six percent of riders would not make the trip; seventeen percent of riders would have made the trip by driving.

1.3 TYPICAL INDYGO RIDER IN 2009

IndyGo's typical weekday passenger is a Black/African American female, age 35 to 49 who uses the bus 3 to 5 days a per week to get to and from home and work. She is likely to be employed full-time or part time, but earns less than \$ 15,000 per year. She is transit dependent - meaning that there are no working vehicles in her household. Access to a vehicle through a friend or relative is also limited. If bus service was unavailable, she would either ride with a friend or not make the trip.





The average rider has to make at least one transfer before he/she can complete a one-way trip. Most riders access the bus by walking one to two blocks to get to the nearest bus stop. The same travel patterns hold true for riders to arrive at their destination. Most will walk one to two blocks to arrive at their final destination.

Most IndyGo riders feel that service hours should be extended and that service frequency should be increased.

1.4 TYPICAL INDYGO RIDER IN 2001

NuStats conducted an on-board study of IndyGo ridership in 2001. A typical IndyGo rider in 2001 was a Black/ African American female, age 35 to 49 who used the bus to travel to and from home and work five days a week. The average rider tended to be employed full-time or part-time and work in a service or production position. Although the average rider was employed, the rider typically had a household income under \$10,000 a year. In general, the average rider was transit dependent and had been using the bus service for one year or more. On average, the rider would have to make at least one transfer before completing a one-way trip.

1.5 INDIANAPOLIS DEMOGRAPHICS

According to the 2008 American Community Survey Estimates, Indianapolis has 798,594 residents within its city limits. Sixty-six percent of the population is Caucasian, while 26 percent is African American. Nearly 52 percent of the population is female. Twenty-seven percent of the population is under the age of 21, while 28 percent of the population is over the age of 50.

The 2008 American Community Survey found that the City of Indianapolis has 324,635 households. The median household income is \$43,652. Approximately 33 percent of households earned less than \$30,000 a year. Just over ten percent of households report making between \$60,000 to \$75,000 a year. There are 185,571 families (homes with two or more related individuals) within the city limits. The median family income is \$56,855. Twenty-three percent of families earn less than \$30,000 per year. Nearly 35 percent of families earn \$50,000 to \$100,000 a year in Indianapolis.

IndyGo has a higher percentage of Black/African American riders than the overall population of the City of Indianapolis. Sixty-five percent of IndyGo riders are Black/African American. Thirty-one percent are White/Caucasian. This is nearly the reverse of the ethnic composition of Indianapolis. Sixty-six percent of Indianapolis residents are White/Caucasian. Only twenty-six percent are Black/African American.

IndyGo also has a disproportionately higher number of low-income riders compared with median household income of Indianapolis residents. Nearly 70 percent of IndyGo rides earn less than \$25,000 per year. Conversely, only thirty-three percent of Indianapolis households earn less than \$30,000 per year.

1.6 INDYGO OPPORTUNITIES

a. Transit-Oriented Development

Transit-oriented development (TOD) combines residential and commercial development in areas close to public transit. Typically, TOD is higher-density development proximate to a rail station or major bus route. The activity-based responses revealed that 19.4 percent of IndyGo riders need to make a shopping stop on their tour¹. With the survey showing that a high degree of riders are transit dependent and that the riders typically walk only 1-2 blocks to access the bus, transit-oriented development in the form of commercial activity around major bus stops could serve a major need. This development could include grocery stores, pharmacies, or convenience stores. For example, such development close to a bus stop could be very beneficial for riders who need to pick items up on the way home from work. In major cities with a history of extensive transit operations, such businesses are common. IndyGo may need to consider working with the Indianapolis planning department or private developers to encourage such land use development around existing stops and potential future stops.

1 A tour is a one-way trip made by a transit user





1.7 CHALLENGES

During the data collection effort, the BLA / NuStats team encountered two noteworthy challenges: 1) the logistics of distributing passes to each rider who completed a questionnaire, and 2) the lack of participation by Spanish-speaking individuals.

Riders who completed a survey and returned it on the bus were given an IndyGo one-day bus pass. Some surveyors ran out of passes, and were not able to provide one on the bus to each passenger who completed a survey. For this reason, as the survey progressed NuStats/BLA increased the number of passes given to the surveying teams by closely tracking the average daily ridership for the routes surveyed. Surveyors were instructed to document surveys that were completed, but for which a pass was not issued. This allowed a pass to be mailed to respondents for their participation.

The IndyGo Customer Service office received phone calls from three riders who participated in the survey but did not receive a bus pass. IndyGo documented respondents who called the customer service line so that NuStats could confirm that respondent's survey was complete. If the survey was complete and usable, a pass was mailed to the respondent.

Gathering Spanish-language surveys for the project was challenging. Only 29 Spanish-language surveys were collected. Twelve of those surveys were rejected in the QA/QC process. In total, only 17 Spanish-language surveys were considered complete and incorporated into the final data set.

During the data collection effort, the project team recognized that meeting our sample goal for Spanish-speaking surveys would be challenging. In order to increase participation among these riders, Spanish-language surveyors were assigned to Route 8 to aid in distributing surveys to Spanish-speaking-only riders. NuStats trained five Spanish-speaking surveyors. In addition, BLA/NuStats provided Spanish informational cards to the non-Spanish-speaking surveyors. This was done to obtain additional surveys from Spanish-speaking riders. These cards explained the purpose of the survey and provided tips for completing the survey.





appendix b survey instrument







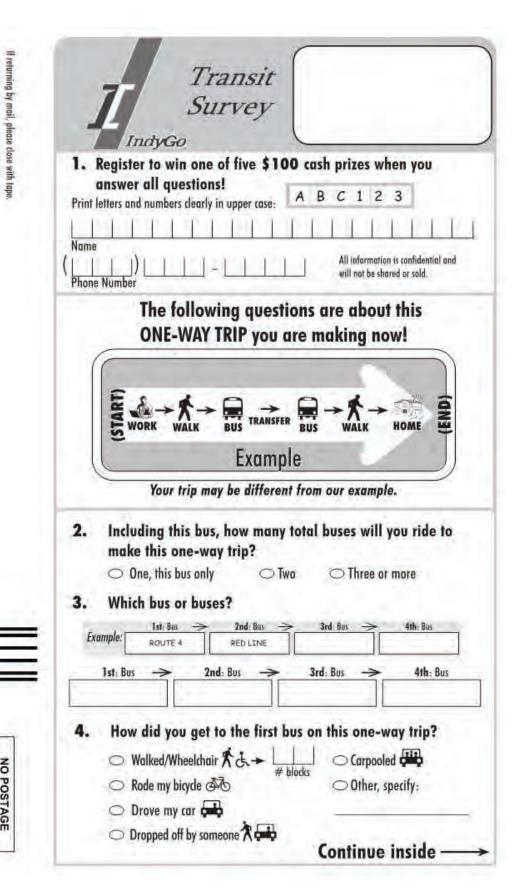


Comments	
	return the completed survey to the surveyor, or any mailbox (no postage required). Thank You!
7	If you have additional customer comments or questions about IndyGo and its services visit www.IndyGo.net or call 635.3344

Hallada da de la composição de la compos

BUSINESS REPLY MAIL
FIRST-CLASS MAIL PERMIT NO. 5478 AUSTIN TX POSTAGE WILL BE PAID BY ADDRESSEE

NUSTATS 206 WILD BASIN RD STE A300 AUSTIN TX 78746-9907









IndyGo

Where are you coming from now? 5. What kind of place?		7.	7. Where will you get off this bus?			Was a car (or other personal vehicle) availal this trip?		ble to make No	
	Work or Work Related Home	 Other School (Student only) Medical Services 		Cross Street #1		17.	Are you	○ Male	O Female
	Shopping	O Social, Religious, or Personal Business				18.	How many days a w	eek do you usually m	ake this trip?
	College (Student only)	Other, specify:		Cross Street #2	Company of the Company		○ 6-7 days/week	Twice a month	First time riding
5a.	What is the name of this place/	building?	8.	How will you get from the last bus this one-way trip?	to your final destination on		3-5 days/week	Once a month	
				○ Walk/Wheelchair ** cs →	Get picked up by someone				and.
5b.	What is the exact street address? (Provide the nearest cross streets if you don't know the exact address) Address Cross Street #1 Cross Street #2 City Zip			Ride my bicycle 🔊	Carpool 🕮	19.	1-2 days/week If hus service was no	Less than once a mo	onin old you make this trip?
				O Drive my car 🛺	Other, specify:		O Drive	○ Taxi	
			9.	What is your age?			○ Walk/Wheelchair 🕏	4	T TELL
				and the state of t	19 to 24		O Ride with friend 🗗	₩ O Wou	ld not make this trip
			10.			20.	What one service do Making transfers ea	e do you feel needs the most improvement?	
			11. Including yourself, how many people live in your House/ Apartment? 1 2 3 4 5 or more				 Start service earlier 		new route from
Whe	ere are you going to now?		12.	Including yourself, how many of th	e people in your		 End service later 	to _	
6.	What kind of place?		100	household are employed full-time	The second secon		 Increase frequency of 	of service Othe	er, specify on back -
	Work or Work Related	ork or Work Related Other School (Student only)		O None O1 O2 O3	○4 ○5 or more				
	○ Home ○ Medical Services			. Are you		21.	 On this ROUND TRIP (between the time you left home and will return home) will you (check all that apply) 		
	Shopping	Other profits		Employed Full-time (more than 30 hrs/week)	 Employed Part-time (less than 30 hrs/week) 		Go to work	Go to school	Go shopping
4-	College (Student only)	Other, specify:		 Not employed Student 	○ Retired			Visit friends/attend	
ou.	What is the name of this place/			Full-time Temporary Employee	O Part-time Temporary Employee		O Do other errands	religious or social eve	a Buy a meal
	100 x - 4	1.6 (1.1	22				Other, specify:		-
OD.	What is the exact street address? (Provide the nearest cross streets if you don't know the exact address) Address Cross Street #1 & Cross Street #2		14.	How many working vehicles are av	ailable to your household? — 4 or more	22.	What was your estin before taxes?	nated total household	l income in 2008
			15.	What is your ethnicity? (check all tha	hat is your ethnicity? (check all that apply)		O Less than \$15,000	\$40,000 - \$49,999	\$100,000 - \$149,999
				○ White/Caucasian	O Black/African American		\$15,000 - \$24,999	\$50,000 - \$59,999	○ \$150,000 or more
				○ Asian	American Indian		O \$25,000 - \$34,999	\$60,000 - \$74,999	All information is confidential and
	City	7in		O Hispanic/Latin American	Other, specify:		\$35,000 - \$39,999	\$75,000 - \$99,999	will not be shared or sold. Thank you!





Una vez completada, favor de entregar la encuesta al ncuestador o ponerla en cualquier buzón (sin gastos de nvío). ¡Gracias!	HH.d.d.m.l.d	BUSINESS REPLY MAIL FIRST-CLASS MAIL PERMIT NO. 5478 AUSTIN TX POSTAGE WILL BE PAID BY ADDRESSEE NUSTATS. 206 WILD BASIN RD STE A300 AUSTIN TX 78746-9907	Encuesta de Tránsito 1. ¡Registrese para ganar uno de cinco permios en efectivo de \$100 cuando conteste todas las preguntas! Escribo las letras y números daramente usando letras mayúsculas: Nombre			
Si tiene comentarios adicionales o preguntas sobre IndyGo y los servicios, visite www.lndyGo.net o llame 635,3344	Haddadaldaldaldalladadalla	NO POSTAGE NECESSARY IF MAILED IN THE UNITED STATES	O Uno, sólo este autobús O Dos Tres a más 3. ¿Qué autobús o autobuses? 1º: Aurobís → 1º: Aurobís → 1º: Aurobís → 1º: Aurobís 1º: Autobís → 1º: Aurobís → 1º: Aurobís 1º: Autobís → 1º: Aurobís → 1º: Aurobís 1º: Autobís → 1º: Aurobís → 1º: Aurobís 4º: Aurobís 4º: Aurobís 4º: Aurobís 4º: Aurobís Compartiendo el auto con otros de primer autobús de este viaja sencillo? Cantinando/En silla de ruedas A → 100 Compartiendo el auto con otros de primer autobús de este viaja sencillo? Cantinando/En silla de ruedas A → 100 Compartiendo el auto con otros de primer autobús de este viaja sencillo? Conduje me carro A Otro, especifique: Conduje me dejá A A Continúe adentro Continúe adentro			





¿De dónde viene en este momento? 5. ¿Qué tipo de lugar?			7. ¿Dónde se va a bajar de este autobús?		16.	 ¿Había algún carro (u otro vehículo personal) disponible que pudo haber usado para hacer este viaje? 			
	○ Trabajo o relacionado con el trabajo ○ Dira Escuela (solo Estudiantes)	Nombre del lugar (incluya el lote de Park & Ride v otros lotes)			17.	¿Es usted	○ Masculino	O Femenino	
	 ○ Casa ○ Servicios Médicos ○ Compras ○ Asunto Social, Religioso, o Personal 		Cruce de calles #1 8			Generalmente, ¿cuántos días a la semana hace este viaje?			
	Compras Asunto Social, Religioso, o Personal Universidad (solo Estudiantes) Otro, especifique:		Cruce de calles #2			O 6-7 dias/semana	O Dos veces al mes	Primera vez en el autobás	
5a.	2. ¿Cuál es el nombre de este lugar/edificio? 2. ¿Cuál es la dirección exacta? (Indique el cruce de calles más cercano si no sabe la dirección exacta)		8. ¿Cómo llegará desde el último autobús a su destino final en este viaje sencillo?			3-5 dias/semana	O Una vez al mes		
10-27						1-2 dias/semana	Menos de una vez a	Imes	
5b.			Carminando/Ensilla de ruedas ★ ♣ ☐ Alguien me va a recoger ★ €		10				
2,000			C En bicicleta 🕉	Compartiendo el auto con otros 🕮	17.	Si este servicio de autobús no estuviera disponible, ¿cómo hubiera hecho este viaje?			
			Conduciendo mi corro 😝	Otro, especifique:		Conduciendo	○ Taxi	⇔	
	Dirección	9.	¿Cuál es su edad?			Cominando/En silla d	e ruedas 🖈 🖒 🗆 Bicid	eta 🐠	
	Cruce de colles #1		O Menor de 16 0 16 a 18	○ 19 a 24 ○ 25 a 34		O Con un amigo en sa	carro Wo l	hubiera hecho	
			○ 35 a 49 ○ 50 a 64	65 años de edad o más	20.	¿Cuál servicio piens		más mejoras?	
	Cruce de calles #2	10. ¿Tiene usted una licencia de conductor válida? OSi ONo				 ○ Hacer los transbordos más fáciles ○ Mejorar el acceso peatonal ○ Empezar los servicios más temprano ○ Añadir una nueva ruta yendo 			
	Cludad Código Postal		11. Induyendo usted, ¿cuántas personas viven en su Casa/Apartmento?						
bAs	ónde se dirige en este momento?	9.73	01 02 03 04	○ 5 o más		Terminar los servicio	es más tarde de	poro	
6.	¿Qué tipo de lugar?		12. Induyendo usted, ¿cuántos miembros de su hogar tienen un trabajo de tiempo completo o medio tiempo?				ncia del servicio 🔾 Ótro,	especifique detrás 🖚	
	Trabajo o relacionado con el trabajo Otra Escuela (solo Estudiantes)		O Ninguno O1 O2 O3	04 05 o más	21.	En acta VIAIE PEDON	NDO (entre la hora qu	o salió do su casa a	
	Casa Servicios Médicos	12	¿Es usted		*11		ted (marque todo lo		
	Compras Asunto Social, Religioso, o Personal	13.	Empleado tiempo completo	C Empleado medio tiempo		a Irá al trabajo	lrá a la escuela	○ Irá de compras	
125	Universidad (solo Estudiantes) Otro, especifique:		(mais de 30 Haras/Semano)	(menos de 30 Horas/Semana)			Visitará a amigos/A	A Company of the Comp	
64.	¿Cuál es el nombre de este lugar/edificio?		Desempleado	O Jubilado		Hará otros recados	a un evento religioso	sistiró Comprará una o social comida	
6h	¿Cuál es la dirección exacta? (Indique el cruce de calles más cercano		Empleado temporal de tiempo completo	 Empleado temporal de medio tiempo 		Otro, especifique:			
ou.	si no sabe la dirección exacta)		14. ¿Cuántos vehículos que funcionan tienen disponibles en su hogar?			¿Aproximadamente	cuál fue el ingreso to	tal de su hogar en	
			○ Ninguno ○1 ○2 ○3	○4 o más		2008 antes de impu	estos?		
	Dirección	15.	¿Cuál es su origen étnico? (marque	todo la une corresponda)		 Menos de \$15,000 	S40,000 - \$49,999	\$100,000 - \$149,999	
	Cruce de calles #1 &	345	○ Blanco/Caucásico	Negro/Afro-americano		S15,000 - \$24,999	\$50,000 - \$59,999	⇒ \$150,000 o más	
			○ Asiótico	Nativo Americano		S25,000 - \$34,999	\$60,000 - \$74,999	Toda la información	
	Cruce de calles #2 Ciudad Código Postal		Hispano/Latinoamericano	Otro, especifique:		S35,000 - \$39,999	\$75,000 - \$99,999	es confidencial y no será compartida el vendida. ¡Gracias!	





Public Engagement for Proposed Title VI Policies

TO:

Chair and Board of Directors

FROM:

Annette Darrow Director of Planning

REQUEST FOR ADOPTION OF TITLE VI POLICIES AND PROGRAM - RESOLUTIONS 2013-03 AND 2013-04

Background:

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs receiving federal financial assistance. To provide guidance on this issue, the Federal Transit Administration (FTA) issued Circular 4702.1B in October 2012 which outlines Title VI compliance procedures for recipients of FTA-administered transit program funds. As a recipient of FTA-administered federal funding, IndyGo must meet the requirements established in this document.

An updated IndyGo Title VI Program is due to the FTA on October 1, 2013. Under the FTA guidelines, IndyGo is required to seek review and approval of key components of its Title VI program by the IndyGo Board of Directors. This includes the following:

- Approval of the "Major Service Change" and "Disparate Impact" policies: Under the new FTA requirements, IndyGo is required to establish a threshold for determining when a service change is considered "major," thus requiring a Service Equity Analysis before implementation. The setting of these policies included public engagement meetings to educate the public on Title VI and solicit feedback on the proposed policies.
- Approval of the Service Monitoring Evaluation: IndyGo is required to set system-wide service standards and policies for vehicle load, vehicle headway, on-time performance, service availability, distribution of transit amenities, and vehicle assignment. The Service Monitoring Evaluation is an assessment of how closely IndyGo is meeting those standards for minority, non-minority, low-income, and non-low-income populations. The evaluation found that the rates of compliance with IndyGo's standards and policies for each population group are within acceptable ranges.
- Approval of the 2013 Service Improvements Service Equity Analysis: The
 two phases of service improvements implemented by IndyGo in 2013 meet the
 criteria for a "major service change." A Service Equity Analysis was completed

to ensure a fair and equitable distribution of service changes throughout the IndyGo service area. The analysis found no disparate impacts to minority populations and no disproportionate burdens to low-income populations as a result of the 2013 service improvements.

The Title VI Program follows and has no appendicies attached, but the full report is on file at IndyGo.

If approved IndyGo will submit the final board adopted program and policies to the Federal Transit Administration by October 1, 2013.

Recommendation:

Adopt policies and program for IndyGo 2013 Title VI Program.

Annette Darrow Director of Planning

Title VI Policies for Adoption By The IndyGo Board of Directors

Resolution 2013-03

The following policies are included in the IndyGo 2013 Title VI Program Update.

Major Service Change Policy

A major service change shall be defined as any proposed change that meets one or more of the following criteria:

- 1. An increase or decrease in fare.
- 2. A service change that will impact <u>25 percent or more</u> of the transit <u>route miles</u> on an existing route.
- 3. A service change that will impact <u>25 percent or more</u> of the total passengers on an existing route.
- 4. An implementation of a new route.

Disparate Impact Policy

Disparate Impact:

"A facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin."

Policy - A determination of disparate impact shall be made if the effects of a major service change borne by the <u>minority population</u>, both adverse and beneficial, are not within <u>20 percent</u> of the effects borne by the <u>non-minority population</u>.

Disproportionate Burden Policy

Disproportionate Burden:

"A neutral policy or practice that disproportionately affects <u>low-income populations</u> more than <u>non-low-income populations</u>."

A determination of disproportionate burden shall be made if the effects of a major service change borne by the <u>low-income population</u>, both adverse and beneficial, are not within <u>20 percent</u> of the effects borne by the <u>non-low-income population</u>.

These policies were adopted by the I.P.T.C. Bo approval date 08-26-2013	pard of Directors Resolution No. 2013-03. Board
FOR: J. K. — Flan Rowland Tommie L. Jones Muce & Ef	AGAINST:
ATTEST: Chang Jack	
for	VI Program Update Adoption by o Board of Directors
Resolu	ution 2013-04
report is on file at IndyGo. Approval by the Ind Appendix G of the Title VI report that will be so later than October 1, 2013.	gram and has no appendicies attached, but the full dyGo Board of Directors will be noted as abmitted to the Federal Transit administration no rd of Directors Resolution No. 2013-04 . Board approval
FOR: The Rowland	AGAINST:
Shear & Sone	
ATTEST: Ormany	

IndyGo Title VI Public Hearings Outreach Summary

Submitted: July 3, 2013 by The McCormick Group

I. Preface

The summary which follows defines public outreach executed for the June 24-25, 2013 IndyGo Title VI public hearings, held in Indianapolis, Indiana. This outreach was in adherence to the June 3 *Proposed Marketing Plan* submitted to IndyGo by The McCormick Group in consultation with SRF Consulting. These executions represent a comprehensive effort to create awareness and invite participation within Indianapolis general market stakeholders and minority and low income targeted populations. The intent of this outreach was equally to inform these publics of the importance of these meetings in the policy decision process and through grass roots repeated frequency, invite their participation.

II. Definition of Activities

The following activities with distribution/ followers and date of execution are listed below.

WEEK ONE	: June 1-8		
Activity		Date	Execution/Distribution
A.	Publicized via e news	June 1	6,000
В.	Contact targeted media for advance meeting announcement focused on minority and key general market audiences	June 4-7	Indianapolis Star, Indianapolis Recorder, Indiana Herald, La Voz de Indiana, WTLC,WTHR, WRTV, WISH
C.	Phone calls placed to targeted neighborhood groups for advance meeting announcement	June 4,5,6,7	35 phone calls placed
D.	Sent two email waves to e neighborhood distribution list	June 6, 7	167 emails per wave, total 340
E.	One multiservice center (Forest Manor)distributed to their email distribution	June 7	4,000 distribution for Forest Manor
F.	Distributed meeting flyers within target audience gatherings places, as defined in the June 3	June 6,7,8	33 sites received flyer s

marketing proposal, including the Center Township Trustee Office, Multiservice centers, Work One Locations and Church sites, with prior calls placed to gain permission and to introduce the meeting opportunity

G. One church Vida Nueva United Catholic Church requested 300 flyers for distribution after the Sunday church service announcement

H. Public Hearing Notice placed Indianapolis Star and Court and Commercial Record

June 7

WEEK TWO: June 10-15 Activity

У		Date	Execution/Distribution
A.	Web presentation posted on the IndyGo website	June 10	
В.	Press Release issued	June 11	
C.	Flyer distributed on IndyGo Open Door and to IndyGo Mobility Advisory Committee	June 11	Distribution 389
D.	Sent three email waves	June 12,13,14	139 emails per wave, total 417
E.	Public Hearing Notice placed La Voz de Indiana	June 12	
F.	Public Hearing Notice placed Indianapolis Recorder	June 14	

WEEK THREE: June 17-22 Activity

rity		Date	Execution/Distribution
A.	Targeted contacts in follow-up to Mayor's Neighborhood Liaisons in the Downtown Center, South Center, Northeast and Northwest Center designations requesting second send of meeting notice to their respective e-distributions	June 17, 18	Distribution 350 per each, total for three respondents 1,050
В.	Targeted phone calls to neighborhood leaders	June 17,18 19	17 phone calls placed
C.	Afternoons with Amos Interview	June 20	Audience 24,000
D.	Indiana Herald story coverage	June 20	Audience 15,000

WEEK FOUR: June 24- 29 Activity

ty	N. Julie 24- 25	Date	Execution/Distribution
A.	Hearing Press Release web posted on Inside Indiana Business with Gerry Dick and IndyStar.com Calendar	June 24	54,000 for Indiana Business, requested not tracked for IndyStar.com
В.	Press Release reissued	June 24	Distribution 389
C.	Indiana Citizen's Alliance for Transit	June 24	Followers 730
D.	WFYI, NPR	June 24	140 listeners
E.	IndyGo Facebook posting	June 24/25	Followers 4,298 per post, total 8,596
F.	Email wave, Remember the Date	June 24	Distribution 139
G.	IndyGo Twitter posting	June 24/25	Followers 1,528 per post, total 3,056
Н.	Hearings Flyer in English/Spanish updated for post meeting comment	June 26	

I. Post meeting Bus announcements posted to continue to promote public comment

June 29-7/10

ATTACHMENTS

Attachment 1: Flyer Placement Sites

Attachment 2: Web/Social Media Postings

Attachment 3: Outreach List – Consultant

Attachment 4: Outreach List - IndyGo

Attachment 1: Flyer Placement Sites

1. Work One Locations

These Centers provide job referral information, education and training principally to minority and low income target audiences.

Work One West 3400 Lafayette Road Indianapolis, IN 46222 (317) 246-5600

Work One East 2525 North Shadeland Avenue, Suite C Indianapolis, IN 46219 (317) 358-4500

Work One Express at College Park 9002 North Purdue Road, Suite 200 Indianapolis, IN 46268 (317) 228-9324 fax

2. Community Health Centers

These Centers provide primary health care services in neighborhood communities largely utilized by minority and low income populations.

Westside Health Center 2732 West Michigan Street Indianapolis, IN 46222 (317) 554-4600

Grassy Creek Health Center 9443 East 38th Street Indianapolis, IN 46235 (317) 890-2100

Jane Pauley Community Health Center 8931 East 30th Street Indianapolis, IN 46219 (317) 355-9320

Cottage Home Health Center 1434 Shelby Street Indianapolis, IN

Attachment 1: Flyer Placement Sites (Continued)

Raphael Health Center 401 East 34th Street Indianapolis, IN 46205 317-926-1507 (p)

Eagledale Health Center 2802 Lafayette Road Indianapolis, IN 46226 317-923-7510 (p)

Linwood Health Center 4401 East 10th Street Indianapolis, IN 46201 317-358-8060 (p)

Eskenazi Health Center Blackburn 2700 Dr. Martin Luther King Jr. Street Indianapolis, IN 46208 317-931-4300 (p)

- 3. Community Walgreens 3425 Massachusetts Avenue Indianapolis, IN 46202
- Mapleton Fall Creek Community Economic Development Center 130 East 30th Street Indianapolis, IN 46205 (317) 923-5514
- Martindale-Brightwood Community Development Center 2855 North Keystone Avenue Indianapolis, IN 46218 (317) 924-8042

6. Multiservice Centers

These organizations provide advocacy and services to improve the quality of life for residents within its respective neighborhoods.

Forest Manor Multiservice Center 5603 East 38th Street Indianapolis, IN 46218 317- 545-1204 (p)

Attachment 1: Flyer Placement Sites (Continued)

Christamore House 502 North Tremont Street Indianapolis, IN 46222 317-635- 7211 (p)

Community Alliance of the Far Eastside, Inc. 8902 East 38th Street Indianapolis, IN 46226 317- 890-3288 (p)

John H. Boner Community Center 2236 East 10th Street Indianapolis, IN 46201 317-633-8210 (p)

La Plaza, Inc. 8902 East 38th Street Indianapolis, IN 46226 317-890-3292 (p)

Martin Luther King Community Center 40 West 40th Street Indianapolis, IN 46208 317-923-4581 (p)

United North East Community Development Corporation 3636 East 38th Street Indianapolis, IN 46218 317-546-6240 (p)

Southeast Neighborhood Development 1030 Orange Street Indianapolis, IN 46203 317- 634-5079 (p)

7. Salvation Army Fountain Square Community Corps 1337 Shelby Street Indianapolis, IN

Flyer Placement Sites (Continued)

8. Center Township Trustee Office 863 Massachusetts Avenue, Indianapolis, IN 46204 317-633-3610(p)

This office provides emergency and short term assistance to the poor and the needy.

- Center for Leadership Development 2425 Dr. Martin Luther King Jr. Street Indianapolis, IN 46208 (317) 923-8111
- Edna Martin Christian Center 2605 East 25th Street Indianapolis, IN 46218 (317) 637-3776
- 11. Flanner House 2424 Dr. Martin Luther King Jr. Street Indianapolis, IN 46208 (317) 925-4231

12. Faith-Based Organizations

St. Phillip Neri Church 550 North Rural Street Indianapolis, IN 46201 (317) 631-8746

Baptist Ministerial Alliance Rev. Stephen Clay 5640 East 38th Street Indianapolis, IN 46218 (317) 568-1534

Interdenominational Ministerial Alliance Rev. Fitzhugh Lyons 2624 East 25th Street Indianapolis, IN 46218 (317) 925-6851

Attachment 1: Flyer Placement Sites (Continued)

Capital City Ministerial Alliance Rev. Eric J. Hayes, Sr. 1502 North New Jersey Street Indianapolis, IN 46202 (317) 602-7360

Ten Point Coalition Rev. Charles Harrison 900 West 30th Street Indianapolis, IN 46208 (317) 923-9197

Union District Baptist Association Rev. Ronald Covington 1301 North Goodlet Avenue Indianapolis, IN 46228 (317) 917-8024

Attachment 2: Newspaper/Web/Social Media Postings

Indiana Herald Circulation: 15,000



President Obama Congratulated Indiana Fever at the White House



During President
Obania's remarks to the
Indiana Fever, he thanked
the women for giving back
to communities not only in
Indiana, but across the
country, He school/degled
Tarniac Catenings, the
MVP of the team, who
started her own founda-

City and State News epting Nominations INDYGO TO HOLD PUBLIC INPUT SESSIONS

INDYGO To Hold Public Input Sessions

INDIANADOLIS — As a policit feedback on to premaring the filtra and equisolution agreesy that reposed "Iffue VI" policies.

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Newspaper/Web/Social Media Postings (Continued)

Inside Indiana Business

Reach: 54,000





Copy Text:

Public Input Session: Title VI Policy: Fair and Equitable Transit Service, 5:30 to 7 p.m. Eugene and Marilyn Glick Indiana History Center, 450 W. Ohio St. Public hearing regarding IndyGo's Title VI policies that ensure fair and equitable transit service and amenities. Public feedback is critical to the policy development process and is a federal requirement for public transit agencies receiving federal funds. Call (317) 635-3344 or visit www.indygo.net.

Newspaper/Web/Social Media Postings (Continued)

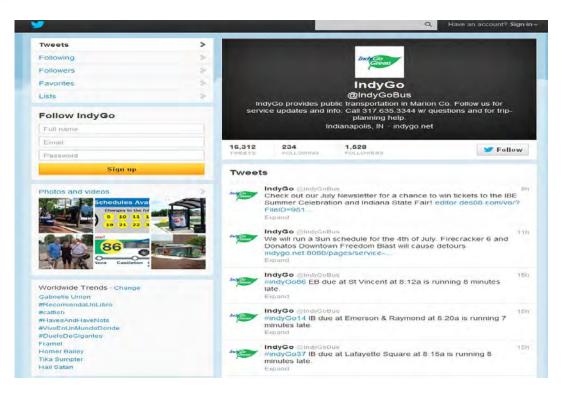
IndyGo Facebook Posting 4,298 Followers Posted June 24th & 25th, 2013





Newspaper/Web/Social Media Postings (Continued)

IndyGo Twitter Posting 1,528 Followers





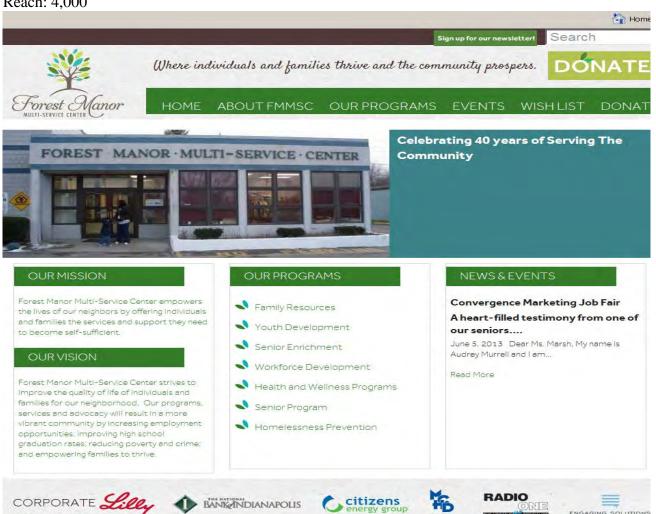
Newspaper/Web/Social Media Postings (Continued)

WFYI – National Public Radio (NPR)

Reach: 140,000 ☐ House . ☐ Leare ()) . ☐ Kean was 🖆 Lils . Lade . paseλ . Ions . ♠ Heb . PUBLIC TELEVISION ▶ PUBLIC RADIO ➤ IRIS ➤ LEARNING SERVICES ➤ EVENTS ➤ SUPPORT ➤ SHOP American Experience Mount Rushmore Morning Edition

Forest Manor Multiservice Center

Reach: 4,000



Newspaper/Web/Social Media Postings (Continued)

WTLC – Radio One

"Afternoons with Amos"

Reach: 24,000

Live on-air taping with Samantha Cross, IndyGo VP of Business Development and Matti

McCormick, Consultant

June 20, 2013





Attachment 2: Newspaper/Web/Social Media Postings (Continued)

Indiana Citizen's Alliance for Transit Facebook 730 Followers





Attachment 3: Outreach List – Consultant

Note: The organizations referenced below represent neighborhood organizations, quasi neighborhood affiliated groups also faith based and civic organizations. We propose to utilize this list for email and telephone outreach.

#	Organization Category	Organization Name	Township	Contact	Title	E-Mail	Home #	Office #	Fax #
1.	Neighborhood Organization	ARSENAL HEIGHTS CIVIC LEAGUE	Center	Paul Lambie	President	arsenalheights@yahoo.com	409- 4047	327- 3644	n/a
2.	Neighborhood Organization	BABE DENNY NEIGHBORHOOD GROUP	Center	Pauline Finkton	President	mintpaul@sbcglobal.net	923- 8361	923- 8361	n/a
3.	Neighborhood Organization	BARRINGTON GARDENS NEIGHBORHOOD ASSOCIATION	Center	Miguel Hanza	President	mhanza@interosity.com	784- 9943	n/a	n/a
4.	Public or Quasi-Public Organization	BOS COMMUNITY DEVELOPMENT CORPORATION	Center	Dorothy Jones	President	boscdc@sbcglobal.net	n/a	917- 9134	917- 8517
5.	Neighborhood Organization	BRIGHTWOOD CONCERNED CITIZENS NEIGHBORHOOD ORGANIZATION	Center	Elaine Bolden	President	bldelai8@aol.com	545- 8249	n/a	n/a
6.	Neighborhood Organization	BROOKSIDE BUNCH NEIGHBORHOOD ORGANIZATION	Center	Frank Watson	President	frankdwatson@sbcglobal.net	266- 9345	435- 1880 (cell)	n/a
7.	Neighborhood Organization	BROOKSIDE NEIGHBORHOOD ASSOCIATION	Center	Chip Gibson	President	brooksidenaprez@gmail.com	756- 7710	n/a	n/a
8.	Other Organization	CENTER FOR LEADERSHIP DEVELOMENT	Center	Dennis Bland	President	dbland@cldinc.org	n/a	923- 8111	923- 8112
9.	Neighborhood Organization	CHATHAM-ARCH AND MASSACHUSETTS AVENUE HISTORIC DISTRICT	Center	c/o Mark Porteous	UDC Chair	n/a	822- 3856	n/a	n/a

10.	Neighborhood Organization	CHATHAM-ARCH NEIGHBORHOOD ASSOCIATION, INC	Center	Gary Pike	President	n/a	n/a	n/a	n/a
11.	Neighborhood Organization	CITIZENS NEIGHBORHOOD COALITION	Center	Kenneth A. Qadir	President	n/a	926- 0858	n/a	327- 5568
12.	Neighborhood Organization	COALITION OF NORTHEAST NEIGHBORHOODS WEED AND SEED	Center	Sonja Buckner- Marion	President	n/a	n/a	221- 2156	221- 2130
13.	Neighborhood Organization	COLE-NOBLE COMMERCIAL ARTS DISTRICT	Center	Mark Easley	President	n/a	n/a	636- 4516	974- 0128
14.	Neighborhood Organization	COTTAGE HOME NEIGHBORHOOD ASSOCIATION, INC.	Center	Maribeth Bailey	President	n/a	752- 1816	423- 8909	423- 8906
15.	Neighborhood Organization	CROSSTOWN COMMUNITY ORGANIZATION	Center	Phyllis A. Carr	President	ekta4c@aol.com	923- 8360	543- 4828	543- 3257
16.	Neighborhood Organization	CROWN HILL NEIGHBORHOOD ASSOCIATION, INC.	Center	Steve Scott	President	micdog64@yahoo.com	925- 2503	925- 2503	n/a
17.	Other Organization	DENNY STREET BLOCK CLUB/CRIME WATCH	Center	Jack C. Mayes	Co-Block Captain	n/a	356- 1512	356- 1512	n/a
18.	Neighborhood Organization	DREXEL AVENUE CRIME WATCH BLOCK CLUB	Center	Patti Cooper	Block Captain	pcooper122@sbcglobal.net	496- 7098	972- 1180	n/a
19.	Business Organization	EAST 10TH STREET CIVIC ASSOCIATION	Center	Tammi L. Hughes	Director	information@teneast.org	n/a	633- 8162	633- 3006
20.	Neighborhood Organization	EDNA MARTIN CHRISTIAN CENTER	Center	Larry Lindley	Director	Edna Martincc@indy.rr.com	n/a	637- 3776	637- 4989
21.	Neighborhood Organization	EMERSON HEIGHTS COMMUNITY ORGANIZATION	Center	Don Bailey	President	n/a	353- 6780	n/a	n/a

22.	Neighborhood Organization	ENGLEWOOD NEIGHBORHOOD ASSOCIATION	Center	David Price	President	dgprice@mibor.net	685- 2784	496- 8992	290- 3942
23.	Neighborhood Organization	EUGENE BLOCK CLUB	Center	Vanessa Bush	Coordinator	Vanessa.bush@sbcglobal.net	925- 9066	n/a	n/a
24.	Homeowner and Condominium Association	FALL CREEK PLACE HOMEOWNERS ASSOCIATION, INC.	Center	Julie Beaubien	President	board@fallcreekplace.com	n/a	258- 5708	n/a
25.	Neighborhood Organization	FALL CREEK PROPER	Center	Ben Bruss	Co-Chairman	benbruss@pobox.com	925- 0500	509- 2827	927- 7350
26.	Homeowner and Condominium Association	FAYETTE STREET HOMEOWNERS ASSOCIATION	Center	Anna Waggoner	President	a-waggoner@sbcglobal.net	633- 1350	730- 5991	692- 0310
27.	Neighborhood Organization	FLETCHER PLACE NEIGHBORHOOD ASSOCIATION, INC.	Center	Jeff Miller	Contact Person	jeff030167@indy.rr.com	917- 0545	803- 4378	n/a
28.	Neighborhood Organization	FOREST MANOR PARK	Center	Bruce Jacobs	President	bjacobs@indy.rr.com	359- 5054	327- 5554	n/a
29.	Neighborhood Organization	FOUNTAIN SQUARE MERCHANTS ASSOCIATION	Center	Robb Biddinger	President	n/a	n/a	n/a	n/a
30.	Neighborhood Organization	FOUNTAIN SQUARE SOUTH ASSOCIATION	Center	Ann Laurens	President	ann81947@sbcglobal.net	791- 0294	n/a	n/a
31.	Neighborhood Organization	FRIENDS AND FACT	Center	Cindy Cox	President	n/a	370- 9473	n/a	n/a
32.	Neighborhood Organization	FRIENDS AND NEIGHBORS BLOCK CLUB ASSOCIATION	Center	Gwendolyn B. McGill	Acting President	gwendolymcgill@sbcglobal.net	542- 0297	439- 8283	n/a
33.	Neighborhood Organization	GARFIELD NEIGHBORS NEIGHBORHOOD ASSOCIATION	Center	Jim Simmons	President	jsimmons@ceilcoteapc.com	784- 9443		n/a

34.	Neighborhood Organization	GARFIELD PARK- SOUTH NEIGHBORHOOD ASSOCIATION INC.	Center	Russell Clemens	Moderator	indyclem@aol.com	783- 3164	264- 8756	n.
35.	Neighborhood Organization	GERMANIA CREEK NEIGHBORHOOD ASSOCIATION	Center	Glenda Hueber	President-Interim	ghueber@indyrr.com	902- 2805	n/a	n
36.	Neighborhood Organization	GOD'S HELPING HAND	Center	Suzett Moffitt	President	suzettmoffitt@yahoo.com	n/a	605- 6904	6 30
37.	Neighborhood Organization	GRACE TUXEDO PARK NEIGHBORHOOD ORGANIZATION	Center	Patricia A. Vernon	President	pavemolly@sbcglobal.net	357- 3144	357- 3144	n
38.	Neighborhood Organization	GREATER CITIZENS COALITION OF MARTINDALE- BRIGHTWOOD	Center	Shirley T. Webster	President	stwebsite@sbcglobal.net	n/a	924- 4709	6
39.	Neighborhood Organization	HAYWOOD PARK NEIGHBORS' ASSOCIATION	Center	Marc McAleavey	Organizer/ Co- founder	n/a	409- 0385	920- 0330 Ext. 104	0
40.	Neighborhood Organization	HERRON-MORTON PLACE ASSOCIATION, INC.	Center	Jonathan Chumley	IHPC Representative	Jonathan.C.Chumley@Rolls-Royce.com	523- 6708	230- 2156	,
41.	Neighborhood Organization	HIGHLAND VICINITY NEIGHBORHOOD ASSOCIATION	Center	Marcia Warrington	President	mmaedais@aol.com	283- 2482	n/a	2
42.	Neighborhood Organization	HILLSIDE NEIGHBORHOOD ORGANIZATION	Center	Shirley T. Webster	President	stwebsite@sbcglobal.net	631- 2543	n/a	r
43.	Neighborhood Organization	HISTORIC MERIDIAN PARK NEIGHBORHOOD ASSOCIATION	Center	Doug Day	President	dougdayski@mindspring.com	978- 397- 4245	n/a	r
44.	Neighborhood Organization	HOLY CROSS NEIGHBORHOOD ASSOCIATION	Center	Patrick D. Dubach	President	desert6178@mypacks.net	917- 2027	281- 0482	3
45.	Neighborhood Organization	HOLY ROSARY NEIGHBORHOOD ORGANIZATION	Center	Antonio Simeone	President	holyrosaryneighborhoodorg@yahoo.com	n/a	709- 2222	ı

46.	Neighborhood Organization	INDIANAPOLIS DOWNTOWN, INC.	Center	Tamara Zahn	President	tamara@indydt.com	n/a	237- 2222	237- 2209
47.	Neighborhood Organization	INDIANAPOLIS NEIGHORHOOD RESOURCE CENTER	Center	Nita McCormick	Membership Serv. Coord.	namccormick@inrc.org	n/a	920- 0330	920- 0556
48.	Neighborhood Organization	INDIANAPOLIS, CHURCHMAN AVENUE NEIGHBORHOOD (ICAN)	Center	Marti LaMar	N/A	n/a	635- 4431	445- 0160	n/a
49.	Public or Quasi-Public Organization	INDY-EAST ASSET DEVELOPMENT	Center	Tyson Domer	Project Manager	tdomer@enn.org	n/a	808- 2308	633- 3006
50.	Neighborhood Organization	IRISH HILL NEIGHBORHOOD ORGANIZATION	Center	James Boles	President	n/a	638- 3359	n/a	n/a
51.	Public or Quasi-Public Organization	KENNEDY-KING MSC (FOREST MANOR)	Center	Sylvia Marsh	Executive Director	n/a	931- 0166	372- 7435	372- 7435
52.	Neighborhood Organization	KENNEDY-KING NEIGHBORHOOD ASSOCIATION	Center	Mike Tolan	President	mjtolan@gmail.com	n/a	225- 8035	n/a
53.	Neighborhood Organization	KEYSTONE STREET PRESERVATION SOCIETY - KEYSTONE STREET CRIME WATCH	Center	Victor D. Phillips	Contact Person	n/a	464- 0822	464- 0822	n/a
54.	Public or Quasi-Public Organization	KING PARK AREA DEVELOPMENT CORPORATION	Center	Janine Betsey	Executive Director	kpadc@kpadc.org	n/a	924- 8116	924- 9729
55.	Neighborhood Organization	LITTLE FLOWER NEIGHBORHOOD ASSOCIATION	Center	Morris Schefcik	President	lfneighborhood@aol.com	354- 9583	354- 9583	n/a
56.	Neighborhood Organization	LOCKERBIE SQUARE PEOPLES CLUB	Center	Tony Morreale	Contact	amorreale@indy.rr.com	267- 9038	n/a	n/a

57.	Other Organization	MAPLETON-FALL CREEK DEVELOPMENT CORPORATION	Center	Doressa Breitfield	Intern	doressa@mfcdc.org	n/a	923- 5514	923- 2139
58.	Neighborhood Organization	MAPLETON-FALL CREEK NEIGHBORHOOD ASSOCIATION	Center	Alfred Polin	Contact	aepolin@sbcglobal.net	926- 7794	n/a	926- 0989
59.	Public or Quasi-Public Organization	MARTINDALE- BRIGHTWOOD COMMUNITY DEVELOPMENT CORPORATION	Center	Josephine Rogers	Executive Director	jo-rogers@sbcglobal.net	n/a	924- 8042	924- 8043
60.	Neighborhood Organization	MARTINDALE- BRIGHTWOOD NEIGHBORHOOD ASSOCIATION, INC.	Center	Abu X Henderson	President	abu@mw.net	921- 8608	327- 2962	921- 8608
61.	Neighborhood Organization	MASS AVE URBAN DESIGN COMMITTEE FOR CHATHAM ARCH MASS AVE HISTORIC DISTRICT (CAMA)	Center	Cathleen Krebs William Gray	Administrative Assistant/Committee Chair	admin@riletarea.org	n/a	637- 8996 x200	637- 9235
62.	Neighborhood Organization	MCANA-CENTER TOWNSHIP (2)	Center	Marcia Warrington	Center Township Director	n/a	283- 2482	n/a	n/a
63.	Neighborhood Organization	MEN AND WOMEN OF BARRINGTON, INC.	Center	Leon F. Morrison	Contact	n/a	788- 0066	n/a	n/a
64.	Neighborhood Organization	MERIDIAN- HIGHLAND NEIGHBORHOOD ASSOCIATION	Center	Vicky Roberts	President	vickyvolcano@hotmail.com	920- 1872	n/a	n/a
65.	Business Organization	MIDTOWN ECONOMIC DEVELOPMENT AND INDUSTRIAL CORP. (MEDIC)	Center	Disa Watson- Summers	President	n/a	n/a	637- 4361	n/a
66.	Neighborhood Organization	NEAR EASTSIDE COMMUNITY ORGANIZATION (NESCO)	Center	Chad Abbott	Director	nesco@enn.org	n/a	633- 7300	633- 3006
67.	Homeowner and Condominium Association	NEAR WESTSIDE	Center	Eric Wynn	President	n/a	(317) 638- 0265	n/a	n/a

68.	Neighborhood Organization	NEIGHBORS HELPING NEIGHBORS	Center	Eddie Owens	President	owenseddie@att.net	657- 2486 (cell)	924- 5786	n/a
69.	Other Organization	NESCO LAND USE COMMITTEE	Center	David Hittle	Chair	david_hittle@hotmail.com	974- 1163	n/a	n/a
70.	Neighborhood Organization	NESCO LIQUOR COMMITTEE	Center	Josh Bowling	Chair	jbowlin1@indygov.org	264- 8288	327- 7179	n/a
71.	Neighborhood Organization	NEW NORTH SIDE NEIGHBORHOOD ASSOCIATION	Center	Jane Haldeman	President	n/a	926- 4318	926- 4318	n/a
72.	Neighborhood Organization	NEW RALSTON ESTATES NEIGHBORHOOD ASSOCIATION	Center	Billie S. White	President	wbillies@aol.com	925- 9157	464- 6349	n/a
73.	Neighborhood Organization	NEW STREET BLOCK CLUB/CRIME WATCH	Center	Foster Pilcher	Block Captain	pfilcher@onemissionsociety.org	631- 2108	n/a	n/a
74.	Neighborhood Organization	NORTH RAYMOND EAST MERIDIAN STREET NEIGHBORHOOD	Center	Walt Willett	Organizer	n/a	696- 8480	n/a	n/a
75.	Neighborhood Organization	NORTH SQUARE NEIGHBORHOOD ASSOCIATION	Center	Andrew Reed	President	drew@route3w.com	624- 1542	679- 3739	n/a
76.	Neighborhood Organization	NORTH WEST WAY CIVIC ASSOCIATION	Center	Mary Oliver	President	starchbox@yahoo.com	n/a	924- 5786	n/a
77.	Neighborhood Organization	NORTHWEST NEIGHBORHOOD PARTNERSHIP	Center	Jarrett Benson	President	Jb_cjserv.indy@yahoo.com	640- 8278	924- 5786	n/a
78.	Public or Quasi-Public Organization	NORTHWEST NEIGHBORHOOD PLANNING DEVELOPMENT CORP., INC.	Center	Linda L. Ellis	President	n/a	924- 3569	925- 4177	283- 5832

79.	Neighborhood Organization	NORWOOD NEIGHBORHOOD ASSOCIATION	Center	Brenda McAtee	President	n/a	357- 2834	n/a	n/a
80.	Neighborhood Organization	OAKHILL CIVIC ASSOCIATION	Center	Ms. Frankie E. Casel	President	n/a	925- 0954	925- 0954	925- 5944
81.	Neighborhood Organization	OASIS CHRISTIAN COMMUNITY DEVELOPMENT CORPORATION	Center	Gina G. Lewis	Executive Director	n/a	n/a	925- 7513	925- 6972
82.	Business Organization	OLD NATIONAL ROAD BUSINESS ASSOCIATION	Center	Jay Height	President	jayh@shepherdmail.org	n/a	375- 0203	n/a
83.	Other Organization	OLD NORTHSIDE FOUNDATION	Center	Andra Sudler	President	n/a	638- 4562	n/a	n/a
84.	Neighborhood Organization	OLD NORTHSIDE LAND USE COMMITTEE	Center	Paul DePrez	Chairman	deprezlaw.ons@earthlink.net	631- 9284	631- 2974	631- 9293
85.	Neighborhood Organization	OLD NORTHSIDE NEIGHBORHOOD ASSOCIATION	Center	Nancy Inui	President	n/a	917- 9715	n/a	n/a
86.	Neighborhood Organization	OLD SOUTH SIDE NEIGHBORHOOD ASSOCIATION	Center	Lucy Rockstrom	President	n/a	636- 6762	n/a	n/a
87.	Neighborhood Organization	OLD SOUTHSIDE CONCERNED NEIGHBORS	Center	Dee Mason	President	n/a	636- 2615	n/a	n/a
88.	Neighborhood Organization	ORANGE STREET BLOCK CLUB	Center	Lydia Spotts	Contact	orange@bateshendricks.org	n/a	n/a	n/a
89.	Neighborhood Organization	OXFORD NEIGHBORHOOD ASSOCIATION	Center	Vickie Driver	President	vdriver@clarian.org	525- 1923	962- 8533	n/a
90.	Neighborhood Organization	PLEASANT STREET BLOCK ASSOCIATION	Center	Tonya Beeler	Contact Person	tonyabeeler@gmail.com	439- 2063	n/a	n/a

91.	Neighborhood Organization	POGUES RUN HISTORIC NEIGHBOURHOOD	Center	David Buchanan	Neighborhood Representative	n/a	633- 1307	234- 0297	n/a
92.	Neighborhood Organization	RALSTON HOVEY ARSENAL ASSOCIATION	Center	Shirley O. Hambrite	President	n/a	921- 1829	921- 1829	n/a
93.	Neighborhood Organization	RANSOM PLACE NEIGHBORHOOD ASSOCIATION, INC.	Center	Beryl C. Borel	President	n/a	696- 6225	n/a	631- 4009
94.	Neighborhood Organization	REAGAN PARK COMMUNITY ACTION GROUP	Center	Willie Sparks	President	wsparksoffice@aol.com	925- 5228	410- 6504	n/a
95.	Other Organization	REIMAGINE NEIGHBORHOODS!, LLC	Center	Tyson Domer	Contact	tdomer@enn.org	n/a	808- 2308	633- 3006
96.	Homeowner and Condominium Association	RENAISSANCE PLACE HOMEOWNERS ASSOCIATION	Center	Sarah Murphy	Secretary	n/a	638- 7335	n/a	n/a
97.	Public or Quasi-Public Organization	RILEY AREA DEVELOPMENT CORPORATION	Center	William B. Gray	Executive Director	admin@rileyarea.org	n/a	637- 8996	637- 9235
98.	Homeowner and Condominium Association	RIVER'S EDGE HOMEOWNERS ASSOCIATION, INC.	Center	Joi Smith	President	joigrudetta@aol.com	n/a	n/a	n/a
99.	Neighborhood Organization	RIVERSIDE BLOCK CLUB (1400-1500)	Center	Marie Young	President	n/a	925- 7270	n/a	n/a
100.	Neighborhood Organization	RIVERSIDE CIVIC LEAGUE (RCL)	Center	Peggy Gamlin	President	pgamlin@sbcglobal.net	634- 2030	n/a	n/a
101.	Neighborhood Organization	RMS10 NEIGHBORHOOD CORPORATION	Center	Eric L. Scott	President	n/a	917- 1174	633- 7300	917- 1458
102.	Neighborhood Organization	ROBSON-VOORHEES NEIGHBORHOOD ASSOCIATION	Center	Marilyn Wray	Contact	n/a	634- 1148	n/a	n/a

103.	Neighborhood Organization	SOUTH BRADLEY STREET CRIME WATCH	Center	June Stahl	President	n/a	351- 2950	n/a	n/a
104.	Neighborhood Organization	SOUTH EAST COMMUNITY ORGANZATION (SECO)	Center	Rachel Cooper	President	secocooper@yahoo.com	631- 3437	236- 9245	236- 7228
105.	Neighborhood Organization	SOUTH NEIGHBORHOOD ASSOCIATION	Center	Edna Reeves	Contact	n/a	788- 6913	341- 4280	n/a
106.	Neighborhood Organization	SOUTH VILLAGE NEIGHBORHOOD ASSOCIATION	Center	Elyse Kintner	President	n/a	289- 4599	289- 4599	n/a
107.	Public or Quasi-Public Organization	SOUTHEAST NEIGHBORHOOD DEVELOPMENT, INC.	Center	Mark Stewart	President	mark@sendcdc.org	n/a	634- 5079	n/a
108.	Neighborhood Organization	SOUTHEAST UMBRELLA ORGANIZATION	Center	Yvonne Margedant	Coordinator	sumo@surf-ici.com	n/a	236- 7400 X223	236- 7415
109.	Neighborhood Organization	SOUTHEAST UMBRELLA ORGANIZATION (2)	Center	Rachel Cooper	President	n/a	631- 3437	236- 9245	236- 7228
110.	Neighborhood Organization	SPIRIT & TRUTH COMMUNITY MISSIONS & MINISTRY CENTER	Center	Rev. Melvin Lipscomb	President	mlipsco3@aol.com	319- 2958	319- 2958	897- 3106
111.	Neighborhood Organization	SPRINGDALE NEIGHBORHOOD ASSOCIATION	Center	Dani Cunningham Dawson	President	danicd@sbcglobal.net	695- 3813	n/a	598- 1976
112.	Neighborhood Organization	SPRUCE STREET SQUAD BLOCK CLUB	Center	Art Sauer	Block Captain	artsauer23@yahoo.com	492- 0494	492- 0494	n/a
113.	Neighborhood Organization	ST. CLAIR PLACE NEIGHBORHOOD ASSOCIATION	Center	Joshua Abel	President	abel.josh@gmail.com	n/a	n/a	n/a
114.	Neighborhood Organization	ST. JOSEPH HISTORIC NEIGHBORHOOD ASSOCIATION	Center	Garry Chilluffo	Neighborhood Contact	info@chilluffo.com	636- 5858	637- 6008	n/a

115.	Neighborhood Organization	STRINGTOWN NEIGHBORHOOD ASSOCIATION	Center	Tim Ingram	President	mrtim@lordspantry.org	n/a	987- 6621	n/a
116.	Neighborhood Organization	TEAR/UNITED NEIGHBORHOOD ASSOCIATION	Center	Minister Teresa Sutton	President	sutton4894@sbcglobal.net	n/a	632- 3914	n/a
117.	Public or Quasi-Public Organization	THE CHILDREN'S MUSEUM OF INDIANAPOLIS	Center	Anthony Bridgeman	Director of Community Initiatives	n/a	n/a	334- 4137	921- 4019
118.	Public or Quasi-Public Organization	UNITED NORTHWEST AREA DEVELOPMENT CORPORATION	Center	Keith Veal	President	unwadc@iquest.net	n/a	924- 0199	924- 0682
119.	Neighborhood Organization	UNITED NORTHWEST AREA, INC. (UNWA)	Center	Kathryn Whitlow	Director	katherinewhitlow@yahoo.com	n/a	924- 5786	n/a
120.	Public or Quasi-Public Organization	UNITY PARK RESIDENTS COUNCIL	Center	Pamela Storey	President	n/a	924- 6398	n/a	n/a
121.	Neighborhood Organization	UPPER CANAL NEIGHBORHOOD ASSOCIATION	Center	Evelyn F. Rusthoven	President	n/a	n/a	631- 8865	n/a
122.	Neighborhood Organization	VICTORY INNER- CITY MINISTRIES	Center	Eric Himelick	Chairman	eric@vicm.org	375- 0869	506- 3373	n/a
123.	Neighborhood Organization	WATSON PARK BLOCK CLUB	Center	Thomas Haynie	Crime Watch Block Captain	n/a	925- 3572	n/a	n/a
124.	Neighborhood Organization	WATSON-McCORD NEIGHBORHOOD ASSOCIATION	Center	Dianne Montgomery	President	n/a	920- 0732	276- 4973	n/a
125.	Neighborhood Organization	WILLARD PARK OF HOLY CROSS- WESTMINSTER	Center	Zach Adamson	President	WillardParkHCW@aol.com	635- 9027	n/a	n/a
126.	Neighborhood Organization	WINDSOR PARK NEIGHBORHOOD ASSOCIATION	Center	Chuck Coleman	President	n/a	n/a	213- 7407	n/a

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127.	Neighborhood Organization	WOODRUFF PLACE CIVIC LEAGUE, INC.	Center	Thomas Abeel	President	tabeel@indy.rr.com	631- 1923	808- 2379	n/a
128.	Neighborhood Organization	WOODRUFF PLACE HISTORICAL PRESERVATION COMMITTEE	Center	Brent Roberts	Chairperson	broberts@rowlanddesign.com	635- 9701	636- 3980	n/a
129.	Neighborhood Organization	ZION HILL M.B. CHURCH HELPING HANDS FOR YOUTH	Center	Teresa Lee- Robinson	Executive Director	tleerobinson@sbcglobal.net	702- 2461	631- 1543	632- 5053
130.	Neighborhood Organization	FOREST MANOR MULTI SERVICE CENTER, INC.	Center Lawrence Warren	Regina Marsh	Executive Director	rmarsh@fmmsc.org	n/a	545- 1204	545- 3096
131.	Neighborhood Organization	EMERSON AVENUE AREA CIVIC ALLIANCE, INC., THE	Center Lawrence Warren Washington	Tom Shannon	President	n/a	546- 5757	n/a	546- 2092
132.	Neighborhood Organization	UNITED NEIGHBORHOOD ASSOCIATION	Center Lawrence Warren Washington	Tom Shannon	Vice-President	n/a	546- 5757	n/a	546- 2092
133.	Public or Quasi-Public Organization	UNITED NORTH EAST COMMUNITY DEVELOPMENT CORPORATION	Center Lawrence Warren Washington	Durmon J. Jones	Executive Director	unecdc@unecdc.org	n/a	546- 6240	546- 6047
134.	Public or Quasi-Public Organization	CONCORD COMMUNITY DEVELOPMENT CORPORATION	Center Perry	Mark Flanary	President	mark@concordcdc.org	n/a	637- 4376	637- 4380
135.	Neighborhood Organization	CONCORD NEIGHBORHOOD CENTER	Center Perry	Niki Girls	Executive Director	n/a	n/a	637- 4376	637- 4380
136.	Neighborhood Organization	CHRISTIAN PARK ACTIVE COMMUNITY (CPAC)	Center Warren	M. Anne Holy	President	intoit317@sbcglobal.net	356- 3329	356- 3329	356- 8013
137.	Neighborhood Organization	FOREST MANOR NORTH NEIGHBORHOOD ASSOCIATION	Center Warren	Ruth Williams	Contact	n/a	n/a	n/a	n/a
138.	Neighborhood Organization	JOHN H. BONER COMMUNITY CENTER	Center Warren	James Taylor	Executive Director	jtaylor@enn.org	n/a	633- 8210	633- 3006

139.	Public or Quasi-Public Organization	NEAR NORTH COMMUNITY DEVELOPMENT CORPORATION	Center Washington	Michael Osbourne	President	michael@nearnorthcdc.org	n/a	927- 9881	927- 9978
140.	Neighborhood Organization	HAUGHVILLE COMMUNITY COUNCIL	Center Wayne	Anthony Whitley	President	tchalla6711@hotmail.com	n/a	635- 7211	635- 1388
141.	Public or Quasi-Public Organization	WEST INDIANAPOLIS DEVELOPMENT CORPORATION	Center Wayne	Jeff Gearhart	Executive Director	wstindydev@aol.com	n/a	638- 9432	638- 9514
142.	Neighborhood Organization	WEST INDIANAPOLIS NEIGHBORHOOD CONGRESS (WINC)	Center Wayne	Rick Freeman	President	n/a	n/a	n/a	n/a
143.	Neighborhood Organization	PRISCILLA AVENUE BLOCK CLUB	Lawrence	Maxine Gilliam	Block Club Co- ordinator	n/a	542- 7010	n/a	n/a
144.	Neighborhood Organization	COMMUNITY ALLIANCE OF THE FAR EASTSIDE, INC. (CAFE)	Lawrence Warren	Melissa Drew	Executive Director	n/a	n/a	890- 3288 ext. 20	898- 4397
145.	Neighborhood Organization	THIRTY-EIGHTH & FRANKLIN NEIGHBORHOOD ASSOCIATION	Lawrence Warren	Jim Kane	President	jkaneharris@indyrr.com	371- 3060	750- 5793	n/a
146.	Neighborhood Organization	THIRTY-EIGHTH & SHADELAND COMMUNITY IMPROVEMENT ASSOCIATION	Lawrence Warren	Gregg Ernest	President	n/a	n/a	545- 8518	n/a
147.	Neighborhood Organization	DEVINGTON COMMUNITIES ASSOCIATION, INC.	Lawrence Warren Washington	Ron Gibson	President	rongibson.indy@sbcglobal.net	562- 1556	n/a	n/a
148.	Public or Quasi-Public Organization	DEVINGTON COMMUNITY DEVELOPMENT CORPORATION	Lawrence Washington	Sharon Arnold	Director	sharonarnold@indy.rr.com	547- 9169	710- 7102	n/a
149.	Neighborhood Organization	DEVON NEIGHBORHOOD ASSOCIATION, INC.	Lawrence Washington	Willie A. Gholston	President	wagholston@aol.com	545- 3067	545- 3067	545- 3086

150.	Homeowner and Condominium Association	AUGUSTA CROSSING HOMEOWNERS ASSOCIATION, INC.	Pike	Randy Mitchell	President	secretary@augustacrossinghoa.org	n/a	552- 0892	n/a
151.	Homeowner and Condominium Association	AUGUSTA GREEN HOMEOWNERS ASSOCIATION	Pike	Sean Shepard	President	n/a	875- 0373	n/a	n/a
152.	Neighborhood Organization	AUGUSTA HEIGHTS NEIGHBORHOOD ASSOCIATION	Pike	Kenneth Smith	President	n/a	872- 5859	872- 5859	n/a
153.	Homeowner and Condominium Association	BALLINSHIRE ESTATES	Pike	Linda Roseberry	Crime Watch Coordinator	Isroseberry@cswebmail.com	293- 8970	n/a	n/a
154.	Homeowner and Condominium Association	BAY LANDING, INC.	Pike	Michael L. Eckerle	President	n/a	293- 3750	635- 8900	236- 9907
155.	Homeowner and Condominium Association	BRANCH CREEK AT PIKE HOMEOWNERS ASSOCIATION, INC.	Pike	Bernice M. Curlin	Secretary & ACR	tommiecurlin@sbcglobal.net	802- 9995	n/a	802- 9995
156.	Homeowner and Condominium Association	BURNETT'S PHILLIP'S HOMEOWNER ASSOCIATION	Pike	Rodney Dean	President	n/a	402- 7183	n/a	n/a
157.	Homeowner and Condominium Association	CHESTNUT HILLS, INC.	Pike	Kevin Durcholz	Board Member	kd000001@aol.com	291- 3244	n/a	n/a
158.	Homeowner and Condominium Association	COBBLESTONE II HOMEOWNERS ASSOCIATION	Pike	Barb Roettker	President	n/a	297- 0783	n/a	n/a
159.	Homeowner and Condominium Association	COLLEGE PARK CLUB, INC.	Pike	Janet French	Manager	jfrench@indyami.com	n/a	844- 4229	566- 0493
160.	Neighborhood Organization	CROOKED CREEK HEIGHTS NEIGHBORHOOD ASSOCIATION	Pike	Bernice Gamble	Crime Watch Neigh. Coord	n/a	871- 3383	n/a	n/a
161.	Homeowner and Condominium Association	CROOKED CREEK HEIGHTS SOUTH NEIGHBORHOOD ASSOCIATION, INC.	Pike	Karen Coleman	President	kaycee1959@aol.com	872- 8773	n/a	n/a

162.	Homeowner and Condominium Association	CROOKED CREEK VILLAGES HOMEOWNERS ASSOCIATION	Pike	Robin Guyon	Agent	rguyon@ardsleymgmt.com	777- 5409	253- 1401	259- 0387
163.	Homeowner and Condominium Association	CROOKED CREEK WEST HOMEOWNERS ASSOCIATION, INC.	Pike	Jose' Evans	President	n/a	870- 7149	n/a	n/a
164.	Homeowner and Condominium Association	DEER CREEK HOMEOWNERS ASSOCIATION, INC.	Pike	Karla McCullough	Managing Agent	kmccullough@cas-indiana.com	n/a	875- 5600	875- 5614
165.	Neighborhood Organization	CROOKED CREEK COMMUNITY COUNCIL, INC.	Pike Washington	Barbara Burcham	Director of Community Affairs	bjburcham@comcast.net	n/a	n/a	n/a
166.	Neighborhood Organization	CROOKED CREEK COMMUNITY COUNCIL, INC. (2)	Pike Washington	Robert Vernon	President	bvernon-c4@comcast.net	n/a	n/a	n/a
167.	Neighborhood Organization	CROOKED CREEK MULTI-SERVICE CENTER	Pike Washington	Helen W. Lands	Executive Director	helenlands@aol.com	n/a	293- 2600	293- 2661
168.	Neighborhood Organization	CROOKED CREEK NORTHWEST CDC	Pike Washington	Alicia Chadwick	Executive Director	achadwick@msn.com	506- 4810	338- 8460	338- 8462
169.	Neighborhood Organization	MICHIGAN ROAD RIVIERA CIVIC ASSOCIATION	Pike Washington	Ruth M. Snow	President	snowrm1964@msn.com	255- 9055	n/a	255- 9032
170.	Neighborhood Organization	MICHIGAN- HIGHLAND CIVIC ASSOCIATION	Pike Washington	Kerry M. Manders	President	kerry@iquest.net	388- 3695	n/a	n/a
171.	Neighborhood Organization	FAR EASTSIDE NEIGHBORHOOD ASSOCIATION	Warren	Norman Pace	President	npace1@peoplepc.com	894- 8820	n/a	894- 9785
172.	Neighborhood Organization	FIRST EASTSIDE NEIGHBORHOOD COALITION	Warren	James A. Stevenson	President	jasteve10@msn.com	353- 0017	353- 0017	n/a
173.	Neighborhood Organization	FOREST CREEK NEIGHBORHOOD ASSOCIATION	Warren	Chris Snyder	President	usnyder351@aol.com	897- 3858	n/a	n/a

174.	Other Organization	FRANKLIN/ POST NEIGHBORHOOD GROUP	Warren	Tina Horner	Area Coordinator	tinahorner@comcast.net	899- 3343	545- 3626	n/a
175.	Homeowner and Condominium Association	GRASSY CREEK HOMEOWNERS ASSOCIATION	Warren	Frank Brown	President	indianabrowns@sbcglobal.net	894- 0210	n/a	n/a
176.	Other Organization	BROAD RIPPLE GAZETTE	Washington	Alan Hague	Editor	alan_hague@broadripplegazette.com	508- 6634	508- 6634	536- 3625
177.	Neighborhood Organization	BROAD RIPPLE VILLAGE ASSOCIATION, INC.	Washington	Sharon Butsch Freeland	Executive Director	brva@mybroadripple.com	n/a	251- 2782	251- 1322
178.	Neighborhood Organization	BUTLER TARKINGTON NEIGHBORS COALITION	Washington	Callie J. Sanders	President	n/a	925- 7299	925- 7299	n/a
179.	Neighborhood Organization	BUTLER- TARKINGTON NEIGHBORHOOD ASSOCIATION	Washington	John Barth	President	jbarth53@hotmail.com	902- 1453	n/a	n/a
180.	Neighborhood Organization	MARTIN LUTHER KING COMMUNITY CENTER	Washington	Netetia K. Walker	Executive Director	nwalker@mlk-msc.org	n/a	923- 4581	923- 4583
181.	Neighborhood Organization	MCANA- WASHINGTON TOWNSHIP	Washington	M. L. Coleman	Township Director	coleman@mcanaindy.org	925- 3577	n/a	925- 7775
182.	Neighborhood Organization	MCANA- WASHINGTON TOWNSHIP (2)	Washington	Mary Walker	Director	walker@mcanaindy.org	531- 1822	n/a	n/a
183.	Neighborhood Organization	MEADOWS-FALL CREEK CIVIC LEAGUE	Washington	Wm. F. Bane	President	n/a	n/a	546- 2314	545- 3555
184.	Homeowner and Condominium Association	CHAPEL GLEN CLUB, INC., THE	Wayne	David Becsey	President	n/a	271- 4258	n/a	n/a
185.	Neighborhood Organization	CHAPEL HILL VILLAGE ASSOCIATION, INC	Wayne	Jim Abbott	President	n/a	248- 9458	390- 2582	390- 2590

186.	Business Organization	EAGLEDALE NEIGHBORHOOD ASSOCIATION	Wayne	Harry A. Simpson	President	haspersonal@yahoo.com	290- 1237	409- 1289	293- 4011
187.	Neighborhood Organization	FAIRFAX NEIGHBORHOOD ASSOCIATION	Wayne	Shea Nolan	Secretary	SheaNolan@aol.com	630- 4336	630- 4336	n/a
188.	Neighborhood Organization	FLACKVILLE NEIGHBORHOOD ASSOCIATION	Wayne	Nada Maynard	President	n/a	925- 6929	n/a	n/a
189.	Neighborhood Organization	GREATER GARDEN CITY ASSOCIATION, INC.	Wayne	Merri Anderson	President	anderson@mcanaindy.org	n/a	241- 9647	n/a
190.	Public or Quasi-Public Organization	Flanner House	Center	Myron Richardson	Executive Director	mrichardson@flannerhouse.com	n/a	925- 4231	n/a
191.	Faith Based	St. Patrick Catholic Church	Center	Maria Romero		n/a	n/a	631- 5824	n/a
192.	Faith Based	Vida Nueva United Methodist Church	Center	David Penlava	Pastor	n/a	n/a		n/a
193.	Faith Based	Holy Spirit Catholic Church	Center	Joann Hunt	Pastor	n/a	n/a	357- 6915	n/a
194.	Faith Based	St. Anthony Catholic Church	Center	Gloria Guillen	Pastor	n/a	n/a	636- 4828	n/a
195.	Faith Based	St. Gabriel Catholic Church	Center	Diacono Oscar Morales	Pastor	n/a	n/a	291- 7014	n/a
196.	Faith Based	St. Lawrence Catholic Church	Lawrence	Damaris Bergeron	Pastor	n/a	n/a	546- 4065	n/a
197.	Faith Based	St. Mary Catholic Church	Center	Juan Manuel Guzman	Pastor	n/a	n/a	637- 3983	n/a

198.	Faith Based	St. Monica Catholic Church	Washington	Anna Marie Megel	Pastor	n/a	n/a	253- 2193	n/a
199.	Faith Based	St. Phillip Neri	Center	Roberto Marquez	Pastor	n/a	n/a	631- 8746	n/a
200.	Faith Based	Baptist Ministerial Alliance	Center	Rev. Stephen Clay	President	n/a	n/a	568- 1534	n/a
201.	Faith Based	Interdenominational Ministerial Alliance	Center	Rev. Fitzhugh Lyons	President	n/a	n/a	626- 0927	n/a
202.	Faith Based	Central District Baptist Association	Center	Rev. Damon Roach	President	n/a	n/a	557- 6187	n/a
203.	Faith Based	Foresight Ministers Alliance	Center	Rev. Darryl Taylor	President	n/a	n/a	923- 1888	n/a
204.	Faith Based	Capital City Ministers Alliance	Center	Rev. Eric Hayes	President	n/a	n/a	281- 1263	n/a
205.	Faith Based	Mt. Carmel Church	Center	Rev. Theron Williams	Pastor	n/a	n/a	890- 2740	n/a
206.	Faith Based	Ten Point Coalition	Center	Rev. Charles Harrison	President	n/a	n/a	281- 3035	n/a
207.	Faith Based	Union District Baptist Association	Center	Rev. Ronald Covington	President	n/a	n/a	917- 8024	n/a
208.	Faith Based	Southern Fellowship District Association	Center	Rev. Roland Woods	President	n/a	n/a	445- 8629	n/a
209.	Faith Based	Healing Streams Church	Washington	Rev. A. Thomas Hill	Pastor	n/a	n/a	280- 8077	n/a

210.	Public or Quasi-Public Organization	La Plaza	Center	Miriam Acevedo Davis	Executive Director	Miriam@laplaza-indy.org	n/a	890- 3292	n/a
211.	Public or Quasi-Public Organization	Indiana Citizens Alliance for Transit	Center	Kim Irwin	Executive Director	kirwin@acsm.org	n/a	352- 3844	n/a
212.	Faith Based	Community Resurrection Partnership	Center	Rev. Bruce Farr	Executive Director	mbcommunitypartnership@gmail.com	n/a	931- 8025	n/a
213.	Public or Quasi-Public Organization	Bates- Hendricks Neighborhood Association	Center	John Winter	Executive Director	president@bateshendricks.org	n/a	n/a	n/a

Attachment 4: Outreach List - IndyGo

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Service Equity Analysis for the IndyGo 2013 Service Improvements

Title VI Service Equity Analysis

Proposed 2013 Service Improvements

Indianapolis Public Transportation Corporation



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Introduction

Title VI and Environmental Justice

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs receiving federal financial assistance. Title VI states that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

In 1994, President Clinton issued Executive Order 12898, which states that each federal agency "shall make achieving environmental justice part of its mission by identifying and addressing disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations."

To that end, the Federal Transit Administration (FTA) issued Circular 4702.1B in 2012, which replaces Circular 4702.1A issued in 2007. This document outlined Title VI and Environmental Justice compliance procedures for recipients of FTA-administered transit program funds. Specifically, the FTA requires recipients, including the Indianapolis Public Transportation Corporation (IndyGo), to "evaluate, prior to implementation, any and all service changes that exceed the transit provider's major service change threshold, as well as all fare changes, to determine whether those changes will have a discriminatory impact based on race, color, or national origin."

This evaluation fulfills this requirement as it relates to the proposed 2013 service improvements.

Title VI Principles and Definitions

Disparate Impact and Disproportionate Burden

The primary purpose of the Title VI Service Equity Analysis is to identify proposed service and fare changes that would result in disparate impacts or disproportionate burdens to minority or low-income populations. Transit providers are allowed to implement service or fare changes that create a disparate impact or disproportionate burden only if they demonstrate that the change meets a substantial need in the public interest and that alternatives to the change would have a more adverse effect than the preferred alternative.

Under the new FTA guidelines, transit providers are required to define their own thresholds to determine when a change in service qualifies as a major service change, requiring a Title VI Service Equity Analysis. Transit providers are also required to define thresholds to determine when disparate impacts and disproportionate burdens exist as a result of a major service change. IndyGo is currently undergoing a public engagement process to define these

thresholds. The proposed major service change, disparate impact, and disproportionate burden policies are as follows:

Major Service Change Policy

A major service change shall be defined as any proposed change that meets one or more of the following criteria:

- 1. An increase or decrease in fare.
- 2. A service change that will impact 25 percent or more of the transit route miles on an existing route.
- 3. A service change that will impact 25 percent or more of the total passengers on an existing route.
- 4. An implementation of a new route.

Per the guidance in the FTA Circular, temporary service changes lasting less than twelve (12) months and temporary fare changes lasting less than six (6) months shall be exempt from the major service change policy.

Disparate Impact Policy

Disparate impact policies apply to minority populations, as defined by the FTA. A determination of disparate impact shall be made if the effects of a major service change borne by the minority population, both adverse and beneficial, are not within 20 percent of the effects borne by the non-minority population.

Disproportionate Burden Policy

Disproportionate burden policies apply to low-income populations, as defined by the FTA. A determination of disproportionate burden shall be made if the effects of a major service change borne by the low-income population, both adverse and beneficial, are not within 20 percent of the effects borne by the non-low-income population.

In this analysis, if the quantitative results indicate that the proposed 2013 service improvements increase average service levels to minority/low-income populations at a rate that is not within 20 percent of the average service level increase for non-minority/non-low-income populations, this could be evidence of disparate impact or disproportionate burden. If disparate impacts or disproportionate burdens are found using these thresholds, mitigation measures should be identified or the transit provider must demonstrate that the service changes meet a substantial need in the public interest and that alternatives to the service changes would have a more adverse effect than what is proposed.

Minority

The FTA defines a minority person as one who self-identifies as American Indian/Alaska Native, Asian, Black or African American, Hispanic or Latino, and/or Native Hawaiian/Pacific Islander. For the purposes of this evaluation, minority persons are defined as those who self-identify as non-White/Caucasian and/or Hispanic. The distribution of minority and non-minority populations within the service change area is shown in Figure 1.

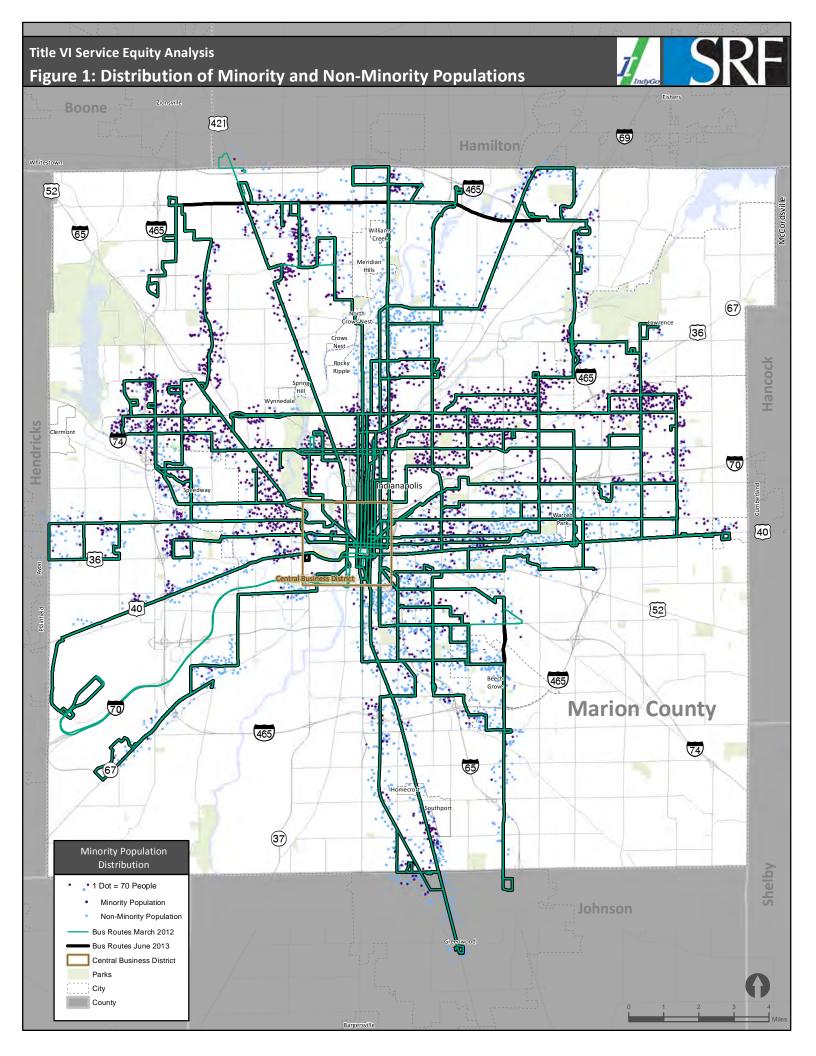
Low-Income

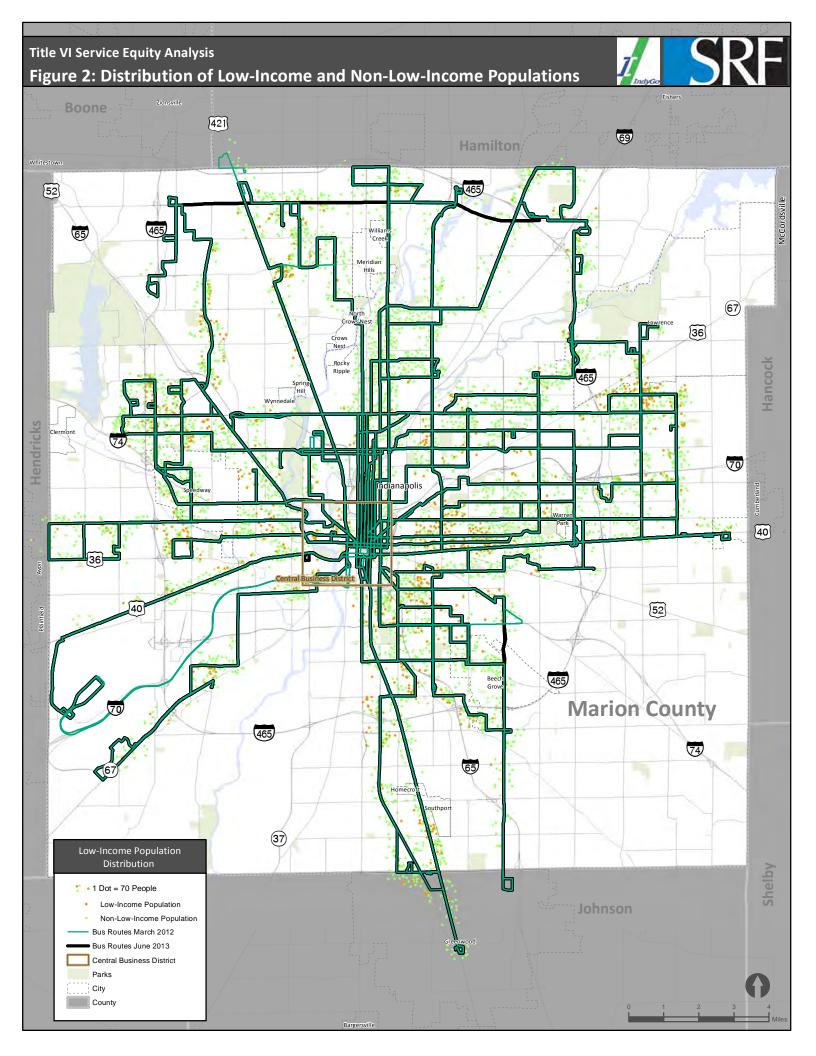
While low-income populations are not an explicitly protected class under Title VI, the FTA recognizes the inherent overlap between Title VI and Environmental Justice principles and requires transit providers to evaluate the impact of service and fare changes to low-income populations and to identify any disproportionate burden placed on those populations by the proposed changes. The FTA defines a low-income person as one whose household income is at or below the poverty guidelines set by the Department of Health and Human Services (DHHS). DHHS poverty thresholds are based on household size and the number of related children less than 18 years of age. The 2011 poverty thresholds used for the data in this evaluation are summarized in Table 1. The distribution of low-income and non-low-income populations within the service change area is shown in Figure 2.

Table 1. 2011 DHHS Poverty Thresholds

Persons in Family	Threshold for 48 Contiguous States and D.C.			
1	\$10,890			
2	\$14,710			
3	\$18,530			
4	\$22,350			
5	\$26,170			
6	\$29,990			
7	\$33,810			
8	\$37,630			
For each additional person, add	\$3,820			

Source: U.S. Department of Health and Human Services (http://aspe.hhs.gov/poverty/11poverty.shtml)





Service Equity Analysis Methodology

A geographic information systems (GIS)-based approach was employed in this analysis to measure the location and magnitude of proposed service changes and compare the distribution of impacts and benefits to minority, non-minority, low-income, and non-low-income populations. The analysis consists of five steps:

- 1. Model current and proposed service levels.
- 2. Spatially allocate current and proposed transit service levels to population groups based on intersection between service buffer and census block centroid.
- 3. Calculate the percent difference in current versus proposed service levels for each census block.
- 4. Calculate the average percent change in service for all minority/low-income and non-minority/non-low-income populations within one quarter-mile of the current and proposed transit service.
- 5. Determine whether the proposed service will result in disparate impacts by applying the disparate impact and disproportionate burden policies.

This analysis uses the number of trips available to each census block as a measure of overall transit service levels. Common improvements to transit service, such as increased frequency and increased span of service, will result in an increase in the number of trips available. The addition of service to a new area will also result in an increase in the number of trips available to the surrounding areas.

Modeling Current and Proposed Service Levels

Two networks were modeled to represent the current service levels and the proposed service levels. The current service level network represents the conditions as of March 2012. The proposed service level network represents the proposed conditions as of June 2013, following the implementation of the proposed 2013 service improvements. The details of the proposed 2013 service improvements are described in more detail on the IndyGo website.¹

A unique line was created for each individual route variation in the current and proposed systems with the total number of trips operated each week. The weekday, Saturday, Sunday, and weekly total trips under each condition and the absolute change in the number of weekly trips for each route are summarized in Table 2.

Title VI Service Equity Analysis Proposed 2013 Service Improvements

¹ http://www.indvgo.net/pages/2013-service-improvements

Table 2. Service Levels for Current and Proposed Service

		Current Service			Proposed Service			ce	
Route	Weekday	Saturday	Sunday	Weekly	Weekday	Saturday	Sunday	Weekly	Absolute Change
2	62	56	29	395	62	56	29	395	0
3	42	30	26	266	42	30	26	266	0
4	46	31	0	261	46	31	0	261	0
5	66	34	30	394	66	34	30	393	-1
8	78	64	54	508	122	64	54	728	220
10	72	65	31	456	96	65	31	576	120
11	29	0	0	145	29	0	0	145	0
12	23	17	14	146	25	19	15	159	13
13	19	14	14	123	19	14	19	128	5
14	45	33	29	287	46	33	29	292	5
15	51	32	14	301	51	32	14	301	0
16	40	26	0	226	40	26	0	226	0
17	68	62	54	456	68	62	54	456	0
18	37	28	0	213	37	28	0	213	0
19	50	32	28	310	65	32	28	385	75
21	40	24	0	224	40	24	0	224	0
22	39	0	0	195	39	0	0	195	0
24	38	22	0	212	38	22	0	212	0
25	42	27	0	237	42	27	0	237	0
26	32	22	15	197	32	22	15	197	0
28	42	31	14	255	42	31	14	255	0
30	55	0	0	275	55	0	0	275	0
31	61	29	12	346	61	29	12	346	0
34	43	28	0	243	47	35	28	298	55
37	61	33	12	350	61	33	12	350	0
38	57	53	44	382	57	53	44	382	0
39	108	59	51	650	122	59	51	720	70
50	60	60	0	360	60	60	0	360	0
55	30	0	0	150	30	0	0	150	0
87	17	16	0	101	31	16	0	171	70
86	-	-	-	-	64	64	0	384	384
205	28	28	28	196	-	-	-	-	-98

Assigning Transit Trips to Census Blocks

Information on minority populations is available at the census block level. However, information on low-income populations is available only at the census block group level. Census block groups and blocks differ in their geographic makeup. Census blocks are the smallest geographic unit used by the United States Census Bureau and are bounded by roadways or water features in urban areas. A census block group is typically made up of a cluster of approximately 40 blocks.

To estimate the low-income populations at the census block level, the total population of each block was multiplied by the percentage of low-income population for its parent block group. This approach assumes that the percentage of low-income population is uniform throughout the block group, but allows for a more precise analysis than an analysis using the block groups as a whole.

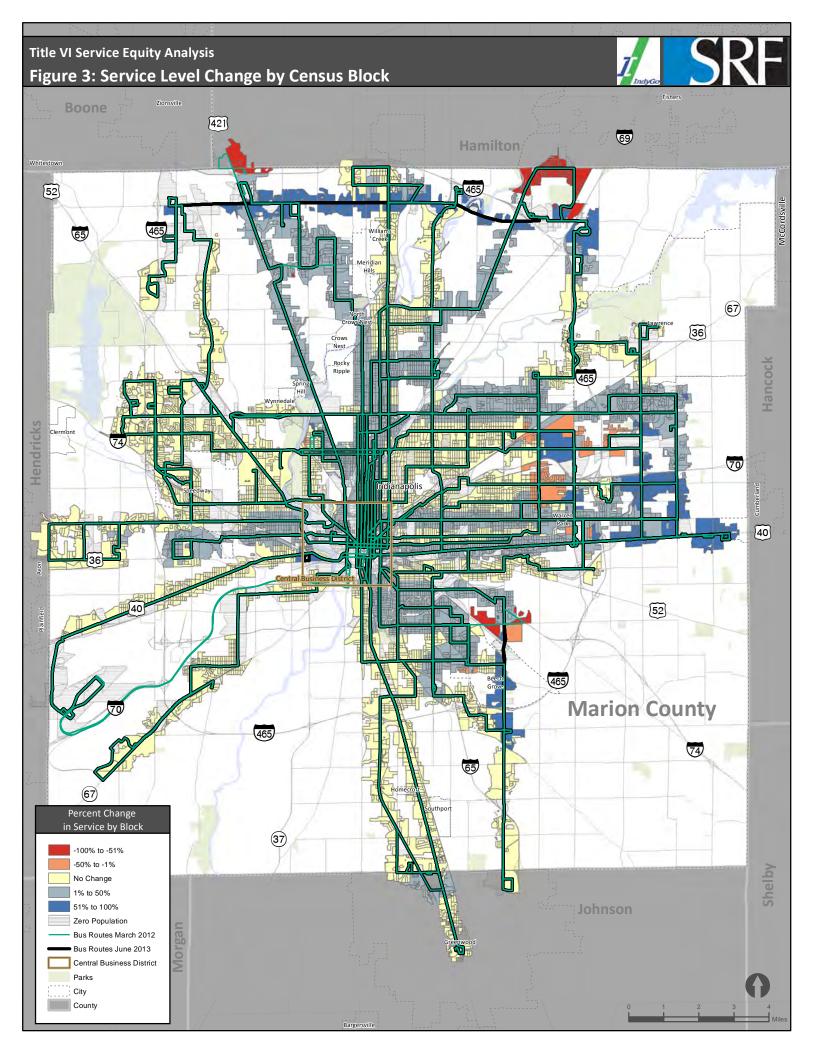
The local bus service trips for each route were allocated to all census blocks with a centroid located within one quarter-mile of that service. All population groups within those census blocks were assumed to be served by those trips. The quarter-mile distance is the standard maximum walking distance to access transit services for local bus service.

The geographic extent of this analysis is limited to those census blocks with centroids that are within one quarter-mile of either the existing or proposed service. This area is primarily located within the boundaries of Marion County, but also includes some census blocks adjacent to service that extends beyond the county line.

Calculating Change in Service Level by Census Block

The change in service level was calculated for each census block by subtracting the current number of weekly trips available from the proposed number of weekly trips available. After the absolute change was calculated, the percent change in service was calculated by dividing the absolute change in weekly trips by the existing number of weekly trips. To minimize artificial skewing from newly served areas, all percentage change figures greater than 100 percent, including those that are incalculable due to zero existing service, were adjusted to 100 percent.

The percent change in service level by census block is shown in Figure 3.



Determining Average Percent Change in Service

The average percent change in service for each target population was calculated by weighting the percent change in each census block by the target population served in that census block. For example, the average percent change in service for minority populations was completed by multiplying each census block's minority population by the percent change in service for that block, summing the results for the blocks impacted by the service change, and dividing the sum by the total minority population of the blocks impacted by the service change.

The formula used for these analyses is shown below:

$$Avg \%\Delta = \frac{\sum Population_i \times Percent Change_i}{\sum Population_i}$$

Where:

 $Population_i =$ Target population of census block *i*.

Percent Change_i = Percent change in service levels for census block i.

In this manner, the weighted percent change was calculated individually for the total population, minority/low-income population, and non-minority/non-low-income population. Using this method, the impacts of the service changes for each census block are proportionate to both the demographics of the census blocks and the degree of service level change.

Evaluation of Impacts

A total of 487,974 people live in census blocks within the service change area. This population includes 238,387 minority persons, 249,587 non-minority persons, 117,795 low-income persons, and 370, 179 non-low-income persons. The average percent change in service levels for each target population group is summarized in Table 3.

Table 3. Average Service Level Change by Population Group

Population Group	Population of Service Change Area	Average Percent Service Change	Acceptable Range		
Minority	238,387	7.5%	6.9% - 10.4%		
Non-Minority	249,587	8.6%	-		
Low-Income	117,795	6.8%	6.7% - 10.1%		
Non-Low-Income	370,179	8.5%	-		
Total	487,974	8.1%	-		

All population groups experience an overall increase in transit service availability as a result of the proposed 2013 service improvements. The average individual in the service change area experiences an 8.1 percent increase in transit service availability as a result of the proposed 2013 service improvements.

The average minority individual in the service change area experiences a 7.5 percent increase in transit service availability. This compares to an average increase of 8.6 percent for non-minority individuals. The average change for minority individuals is within the acceptable range of 6.9 to 10.4 percent based on IndyGo's proposed disparate impact policy. Therefore, no potential for disparate impacts to minority populations is identified.

The average low-income individual in the service change area experiences a 6.8 percent increase in transit service availability. This compares to an average increase of 8.5 percent for non-low-income individuals. The average change for low-income individuals is within the acceptable range of 6.7 to 10.1 percent based on IndyGo's proposed disproportionate burden policy. Therefore, no potential for disproportionate burden to low-income populations is identified.

Additional Analysis

Based on the application of IndyGo's proposed disparate impact and disproportionate burden policies to the results, this evaluation finds no disparate impact or disproportionate burden to minority or low-income populations as a result of the proposed 2013 service improvements. However, further analysis of the service impacts was completed to highlight areas that experience a greater than average impact and to provide additional explanation of, and justification for, the service changes causing those impacts.

Based on the methodology presented in this evaluation, the contribution of the service change at an individual block to the overall average service change is dependent on three key factors:

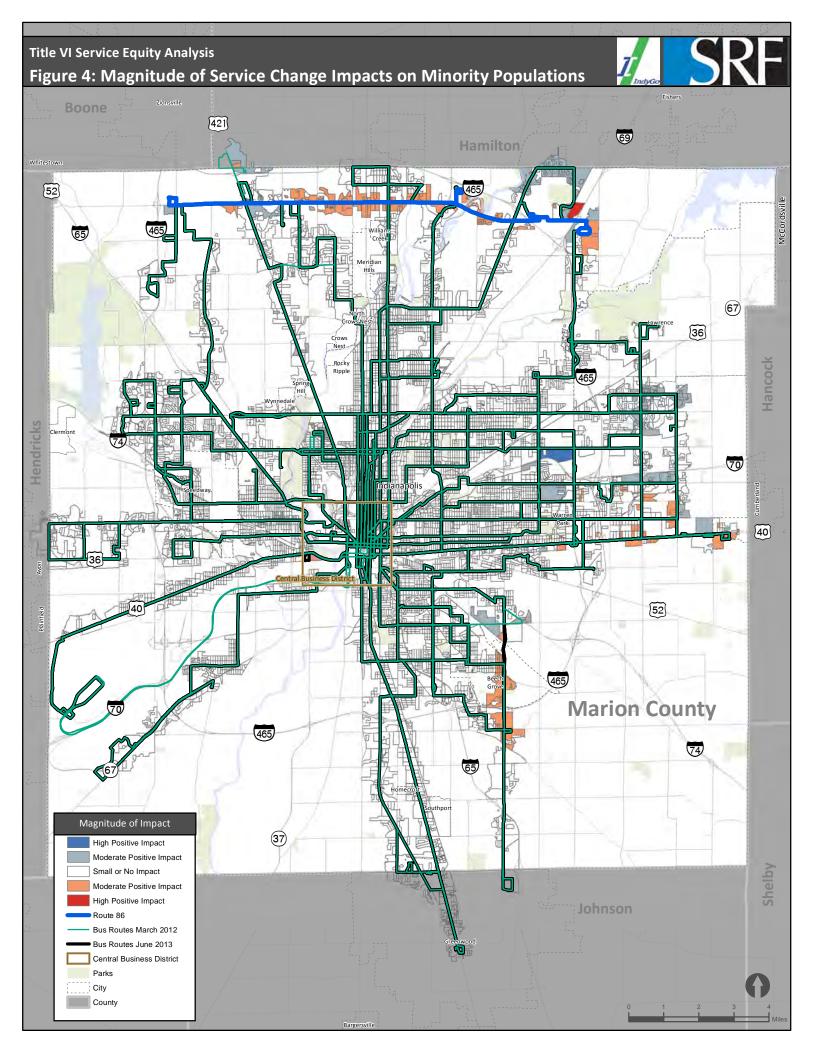
- 1. The difference between the block-level minority/low-income proportion and the service change area average minority/low-income proportion.
- 2. The total population of the block.
- 3. The magnitude of the block-level service change.

For each block, the product of these three factors was calculated to identify blocks where the impacts of the service change have a higher than average impact on the calculation of the average service change. The results of this calculation for minority populations are shown in Figure 4. The results of this calculation for low-income populations are shown in Figure 5. The service level change at each block will have either a positive or negative impact on minority and low-income populations as shown in Table 4.

Table 4. Positive or Negative Impact Determination

	Large Service Increase	Large Service Decrease
Higher than Average Minority/Low-Income Proportion	Positive	Negative
Lower than Average Minority/Low-Income Proportion	Negative	Positive

Figure 4 and Figure 5 highlight locations where the proposed service changes have a high impact on the calculation of average service change for each population group. Of particular note is the concentration of negative impacts along the proposed new route 86. The additional service in this area is shown as a having a negative impact to both minority and low-income populations because the benefits of additional service are distributed in areas with lower than average proportions of minority and low-income populations.



However, it is important to understand that the primary purpose of route 86 is not to provide service to adjacent populations, but to improve the mobility of existing riders in this area. IndyGo riders attempting to travel east-west in this area are currently required to travel south to the downtown area to transfer to a bus that will access their destination. Route 86 will significantly decrease the travel time for east-west transit trips in this area. This route has also been consistently ranked as a high priority based on rider feedback and market research.

As proposed, route 86 will connect with routes 4, 18, 19, 26, 28, 34, and 37, as well as rural transit providers in Boone and Hamilton Counties. The route will provide service to locations such as Community Hospital North, Castleton Square Mall, Keystone at the Crossing Mall, North Central High School, Nora Plaza, St. Vincent Hospital, and Traders Point.

This analysis uses the change in the number of trips as a measure of the increase or decrease in the service level. In most cases, this metric is an accurate means of estimating the positive or negative impacts to the service area. However, in a situation such as route 86, where the purpose of the route is to provide connections for existing riders on perpendicular routes rather than to provide new service for the surrounding areas, this method does not accurately measure the benefits of the route.

To account for this limitation in the evaluation, a revised analysis was completed using the same methodology as previously described, but excluding the proposed new route 86. By excluding this route, the analysis more appropriately accounts for the benefits to the areas surrounding route 86 that are not the primary intention of the new route. The results of this revised analysis are summarized in Table 5.

Table 5. Average Service Level Change by Population Group (Excluding Route 86)

Population Group	Population of Service Change Area	Average Percent Service Change	Acceptable Range		
Minority	237,355	5.9%	4.6% - 7.0%		
Non-Minority	246,394	5.8%	-		
Low-Income	117,378	5.6%	4.7% - 7.1%		
Non-Low-Income	366,371	5.9%	-		
Total	483,749	5.9%	-		

These results show that if the benefits to areas surrounding route 86 are excluded, the average percent changes for all target populations are nearly identical. Therefore, it can be concluded that the impacts of the proposed 2013 service improvements are more equitably distributed than as shown in the initial analysis.

Summary

Under the guidance of FTA Circular 4702.1B, any service change whose benefits are disproportionately distributed to Title VI-protected population groups should be identified as having a disparate impact or disproportionate burden on that population group and should be further reviewed to identify mitigating or alternative measures. Minority and low-income populations experience an average increase in service that is within 20 percent of the increase in service experienced by non-minority and non-low-income populations, respectively. Additionally, a revised analysis to account for limitations of the evaluation methodology shows that the average increase in service for all population groups is nearly identical.

This review finds that the proposed IndyGo 2013 service improvements do not disproportionately affect minority or low-income populations.