

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

Paladin, Inc.

Approved October 2, 2024

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

Section 1: Title VI Plan Approval & Compliance Requirements

Title VI Plan

Adopted on: 10/2/24

Adopted by: Paladin, Inc. Board of Directors

Board Chairperson: Cheryl Chapman

Signature of Board Chairperson: *Cheryl Chapman*

The Board of Directors of Paladin, Inc. approves the following elements of the Title VI Plan:

Title VI Plan Approval & Compliance Requirements

Title VI Policy Statement Notice to the Public

Title VI Complaint Procedure

Title VI Complaint Form

List of Transit Related Title VI Investigations, Complaints and Lawsuits

Public Participation Plan

Language Assistance Plan

Minority Representation Information

Providing Assistance to and Monitoring Subrecipients N/A

Title VI Equity Analysis for Facility Acquisition N/A

Fixed Route Transit Providers Service Standards and Policies N/A

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Annual Certifications and Assurances

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

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

The date of last submission of these certifications and assurances (at the time of this Plan's approval) is: **August 2, 2022.**

Title VI Plan Revision Log

Date Month/day/year	Section Revised	Summary of Revisions
10/1/2024		Previous plan to be discontinued. New template is being used to implement the updated Title VI plan.

Section 2: Title VI Policy Statement

Policy Statement

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

Section 3: Notice to the Public

Title VI Notice to the Public

Paladin, Inc.'s Notice to the Public is as follows:

Notifying the Public of Rights Under Title VI

Paladin, Inc.

- **Paladin, Inc.** operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with **Paladin, Inc.**.
- For more information on **Paladin, Inc.'s** civil rights program, the procedures to file a complaint, or to file a complaint, please contact **Corporate Compliance Officer** at **219-874-4288**; email compliance@paladin.care; or visit our administrative office at **4315 E Michigan Blvd. Michigan City, IN 46360**. For more information, visit www.paladin.care.
- For transportation-related Title VI matters, a complaint may also be filed directly with the:

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

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

- If information is needed in another language, contact **219-874-4288**.

Paladin, Inc.'s Notice to the Public is posted in the public areas of the office and inside the transit vehicles.

1. Agency website: www.paladin.care
2. Front office bulletin board
3. Transportation office
4. Inside Transportation vehicles

Section 4: Title VI Complaint Procedure

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

- Agency website: www.paladin.care
 - Hard copy in the corporate office
 - Agency Title VI Plan
-

Any individual, group of individuals or entity that believes they have been discriminated against on the basis of race, color, or national origin by the **Paladin, Inc.** may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form.

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

A complaint must be filed with **Paladin, Inc.** no later than 180 days after the following:

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

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

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

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

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

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

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

Or

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

If information is needed in another language, then contact **219-874-4288**.

Section 5: Title VI Complaint Form

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

- Agency website: **www.paladin.care**
 - Hard copy in the corporate office
 - Agency Title VI Plan
-

Discrimination ADA/Title VI
Complaint Form

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

Section VI:		
Have you previously filed a Discrimination Complaint with this agency?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

If yes, please provide any reference information regarding your previous complaint.

Section V:

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?

Yes No

If yes, check all that apply:

Federal Agency: _____

Federal Court: _____ State Agency: _____

State Court: _____ Local Agency: _____

Please provide information about a contact person at the agency/court where the complaint was filed.

Name:

Title:

Agency:

Address:

Telephone:

Section VI:

Name of agency complaint is against:

Name of person complaint is against:

Title:

Location:

Telephone Number (if available):

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

Your signature and date are **required** below:

Signature

Date

Please submit this form to:

Paladin, Inc.
ATTN: Corporate Compliance Officer
4315 E Michigan Blvd.
Michigan City, Indiana
46360
219-874-4288
compliance@paladin.care

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

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

Check One:

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

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

Section 7: Public Participation Plan

Strategies and Desired Outcomes

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

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

Public Outreach Activities

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

Specific Public Participation activities are listed in the table below:

Event Date	Paladin, Inc. Staffer(s) or Department	Activity	Communication Method (Public notice, posters, social media)	Notes
Quarterly	Beth West, Transportation Director	LaPorte County Transportation Advisory Committee	Shared Resource Meeting	
Ongoing	Mari Chapala, Corporate Compliance Officer	Transportation service information is maintained.	www.paladin.care	
Ongoing	Brittany Sarthou, Facility Coordinator	Information on Transportation is available at corporate office	Printed materials	
Annually	Mari Chapala, Corporate Compliance Officer	Satisfaction Surveys	A survey is provided to all individuals receiving Transportation services.	
Monthly	Steve Hobby, CEO	Spotlight on local radio to provide service updates.	WIMS 95.1 FM	
Bi-Monthly	Designated Paladin staff and community members	Human Rights Committee	Resource Meeting	

Ongoing	Melissa Bohacek, Marketing & Development Officer	Transportation service updates and offerings.	Social Media	
4/27/24 6/13/24 7/18/24 7/23/24 8/10/24 9/5/24 9/14/24 9/27/24 10/16/24	Melissa Bohacek, Marketing & Development Officer	Resource Fairs (various locations throughout service areas)	Brochures, flyers, Paladin representatives are available to answer questions	

Section 8: Language Assistance Plan

Plan Components

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

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

Paladin, Inc.’s Language Assistance Plan includes the following elements:

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

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

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

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

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

Four Factor Analysis Methodology

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

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

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

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

- (a) Use of bus and rail service;
- (b) Purchase of tickets through vending machines, outlets, websites, and over the phone;

- (c) Participation in public meetings;
- (d) Customer service interactions;
- (e) Ridership surveys;
- (f) Operator surveys.

Factor 3: The nature and importance of the program, activity, or service provided by the program to people’s lives^[BR1]. Generally speaking, the more important the program, the more frequent the contact and the likelihood that language services will be needed.

Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach^[BR2]. Resource and cost issues can often be reduced by technological advances, reasonable business practices, and the sharing of language assistance materials and services among and between recipients, advocacy groups, LEP populations and Federal agencies. Large entities and those entities serving a significant number of LEP persons should ensure that their resource limitations are well substantiated before using this factor as a reason to limit language assistance.

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

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered^[BR3].

Of the 105,945 residents in the **Paladin, Inc.** service area, 1,911 residents describe themselves as speaking English less than “very well”. People of Spanish descent are the primary LEP persons likely to utilize Paladin, Inc. services. For the Paladin, Inc. service area, the latest U.S. Census Bureau data shows that among the area’s population, 2% speak English “less than very well.” **For these groups** who speak English “less than very well”, 61% speak Spanish.

LaPorte County, Indiana – Languages Spoke at Home^[BR4]

LaPorte County, Indiana		
Label	Estimate	Margin of Error
Total:	105,945	±31
Speak only English	100,577	±729
Spanish:	3,154	±490
Speak English "very well"	1,986	±400
Speak English less than "very well"	1,168	±290
French, Haitian, or Cajun:	79	±54
Speak English "very well"	51	±37
Speak English less than "very well"	28	±38
German or other West Germanic languages:	442	±182
Speak English "very well"	397	±180
Speak English less than "very well"	45	±42

Russian, Polish, or other Slavic languages:	632	±470
Speak English "very well"	311	±188
Speak English less than "very well"	321	±315
Other Indo-European languages:	308	±148
Speak English "very well"	304	±149
Speak English less than "very well"	4	±7
Korean:	71	±75
Speak English "very well"	54	±82
Speak English less than "very well"	17	±26
Chinese (incl. Mandarin, Cantonese):	63	±66
Speak English "very well"	41	±56
Speak English less than "very well"	22	±29
Vietnamese:	67	±78
Speak English "very well"	9	±12
Speak English less than "very well"	58	±74
Tagalog (incl. Filipino):	280	±127
Speak English "very well"	106	±92
Speak English less than "very well"	174	±93
Other Asian and Pacific Island languages:	70	±69
Speak English "very well"	26	±43
Speak English less than "very well"	44	±38
Arabic:	108	±76
Speak English "very well"	82	±55
Speak English less than "very well"	26	±29
Other and unspecified languages:	94	±65
Speak English "very well"	90	±66
Speak English less than "very well"	4	±7

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

Paladin, Inc. assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. Paladin, Inc. provides approximately 20,000 passenger trips per year. If an individual

has speech limitations, the dispatcher or driver will work with the Indiana Department of Transportation, if needed, to ensure the individual receives access to the transit services.

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

Paladin, Inc.’s Nonemergency Medical Transportation program is a vital component of the health and welfare of the disabled and senior populations of LaPorte County. The county encompasses a large rural area, and public transit is limited to an extremely small area of coverage within city limits. Seniors and members of the disabled community rely on Paladin, Inc. for transportation to lifesaving medical treatments and appointments.

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

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

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

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

Paladin, Inc. has identified, developed, and uses the following^[BR5]:

- a) Individuals who have contact with the public are provided with “I Speak” language cards to identify language needs in order to match them with available services. Language cards verified and distributed by the Director as need.
- b) Paladin, Inc. has developed partnerships with local agencies, organizations, law enforcement, colleges/universities, local school districts and social service agencies that are available to assist with it LEP responsibilities.
- c) A list of web-based translation services can be provided by contacting compliance@paladin.care.
- d) Human Resources has identified employees that are proficient in other languages that may be able to assist.
- e) Paladin has previously identified and enlisted the services of an individual that is available for Spanish translation as needed.

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

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

- Title VI Program including the Language Assistance Plan is made available at www.paladin.care and a hard copy is available in the corporate office.
- Drivers and dispatchers are provided "I Speak" language cards to identify language needs in order to match them with available services.

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

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

Updates will continue to include the following:

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

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

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

- Information on the Paladin, Inc. Title VI Procedures and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of "I Speak" language cards (used to identify language preference).
- Documenting of language assistance requests.
- Use of web-based interpreter services and/or requesting a live interpreter.
- How to handle a potential Title VI / LEP complaint.

Limited English Proficient (LEP) Resource Materials:

LEP Policy

Paladin, Inc. shall provide for communication for limited English proficient riders to ensure them equal opportunity to benefit from services. Family members or friends of limited English proficient riders will not be used as translators unless specifically requested by that individual. Arrangements have been made with Purdue Northwest to obtain translators. The agency will also utilize web-based translator programs if available. In addition, Paladin employees that are proficient in other languages have been

identified and may be available to assist. Paladin also has enlisted the services of a Spanish translator who has made himself available as needed.

If you need help with English, please call 219-874-4288.

"I Speak" Language Identification Card

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

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

Log of LEP Encounters

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

Section 9: Minority Representation Information

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

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

Minority Representation Table

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

Body	Caucasian	Hispanic	African American	Asian American	Native American	Two or More Races
Paladin Board of Directors	9/90%	1/10%	0	0	0	0
LaPorte County Transportation Advisory Committee	3/75%	0	1/25%	0	0	0

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

Efforts to Encourage Minority Participation

To encourage participation on its boards, committees, and councils, Paladin, Inc. will make every effort to encourage minority participation on the boards. Paladin, Inc. will communicate with the Michigan City Human Rights Commission and the City of LaPorte Diversity and Inclusion Committee when seeking new board members.

Section 10: Providing Assistance to and Monitoring Subrecipients

1. Does agency provide funding to subrecipients?

No, the agency does not have subrecipients.

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

Paladin, Inc. monitors subrecipients using the following process:

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

Section 11: Title VI Equity Analysis for Facility Acquisition

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

No, the agency has not built a facility.

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

Section 12: Fixed Route Transit Providers Service Standards and Policies

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

Paladin, Inc.:

is a fixed route transit provider.

is **not** a fixed route transit provider.