

Northeastern Indiana Regional Coordinating Council



Limited English Proficiency Plan

September 2025

About the Northeastern Indiana Regional Coordinating Council

The Northeastern Indiana Regional Coordinating Council (NIRCC) is the Metropolitan Planning Organization for the Fort Wayne–New Haven–Allen County Urbanized Area and the Regional Planning Organization for Adams, Allen, DeKalb and Wells Counties. The NIRCC Board, in conjunction with the Urban Transportation Advisory Board (UTAB), are directly responsible for making sure that any money spent on existing and future transportation projects and programs is based on a continuing, cooperative and comprehensive (3–C) planning process. All transportation projects and programs that receive federal funding in our region go through this planning process.

Specifically, NIRCC provides overall program management of an annual work program – the Unified Planning Work Program. In addition, NIRCC provides policy direction and oversight in the development of a federally mandated Long Range Transportation Plan, the Transportation Improvement Program and the transportation components of the State Air Quality Implementation Plan. The work program and long–range transportation plan are approved by NIRCC and UTAB. The transportation improvement program and amendments require approval by UTAB.

The NIRCC Board is a 15–member board representing the Cities, Towns and Communities in Adams, Allen, DeKalb and Wells Counties. The UTAB Board is a 13–member board representing Fort Wayne, New Haven, Hometown, Allen County, Indiana Department of Transportation, Fort Wayne–Allen County Airport Authority and Citilink (Fort Wayne Public Transportation Corporation).

The UTAB generally meets on the 1st Tuesday of the month at 1:30pm in Room 220 at Citizen Square, 200 East Berry Street, Fort Wayne, Indiana. There is an opportunity for public comment at each meeting. Check the calendar on the NIRCC web site for upcoming dates, times and agendas. The NIRCC Board meets as needed to discuss regional issues. The meetings are usually held in Room 220 at Citizen Square, 200 East Berry Street, Fort Wayne, Indiana, but may also be held at other public venues within the region.

Who is a LEP Individual?

Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write or understand English.

Background

Limited English Proficiency is a term used to describe individuals who are not proficient in the English language. Federal law: Title VI of the Civil Rights Act of 1964 – National Origin Discrimination Against Persons with Limited English Proficiency, and (Presidential) Executive Order 13166 – requires Federal departments and agencies to develop and make available guidance on how recipients of Federal funds should assess and address the needs of LEP individuals seeking assistance.

The US Department of Transportation (DOT) developed guidance titled A Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient Persons. This guidance was issued to ensure that persons in the United States are not excluded from participation in DOT–assisted programs and activities simply because they face challenges communicating in English.

The intent of this plan is to ensure that where substantial numbers of residents of the Northeast Indiana region exist, who do not speak or read English proficiently, these LEP individuals have access to the planning process and published information, and that public notification is provided in other languages. The production of multilingual publications and documents and/or interpretation at meetings/events will be provided to the degree that funding permits based on current laws and regulations.

Determining the Need

As a recipient of federal funding, the Northeastern Indiana Regional Coordinating Council must take reasonable steps to ensure meaningful access to the information and services it provides. NIRCC used the “Four Factor Analysis” provided below to assess an appropriate policy. The analysis is based on the U.S. Department of Justice Limited English Proficiency Guidance for Recipients (DOJ LEP Guidance) that sets forth a four–factor analysis for agencies to review when determining steps to take to communicate effectively with LEP individuals.

Four Factor Analyses

In determining “reasonable steps” there are four factors to be considered:

1. The number and proportion of LEP people in the eligible service area.
2. The frequency with which LEP people come in contact with the program.
3. The importance of the service provided by the program.
4. The resources available to the recipient.

The US DOT Policy Guidance gives recipients substantial flexibility in determining what language assistance is appropriate based on a local assessment of the four factors listed above.

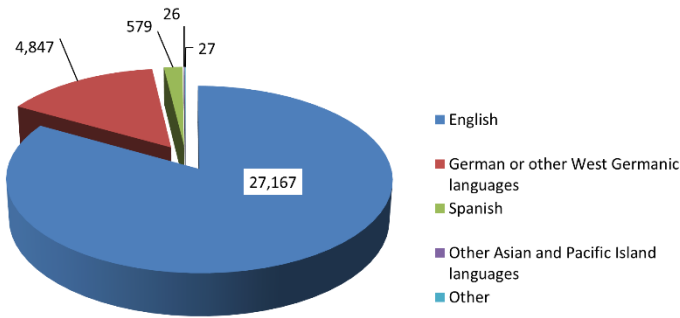
The following is an assessment of need in the NIRCC region in relation to the transportation planning process.

1. The number and proportion of LEP persons in the eligible service area

The first step towards understanding the profile of individuals that could participate in the regional transportation planning process is a review of Census data and American Community Survey data. A baseline report was also generated to determine the extent of persons with limited English proficiency in the Fort Wayne urban area. Executive Order 13166 "Improving Access to Services for Persons with Limited English Proficiency" requires all recipients of federal funds to provide meaningful access to persons who are limited in their English proficiency (LEP). The United States (U.S.) Department of Justice defines LEP individuals as those "who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English" (67 FR 41459). Data about LEP populations was gathered in the U.S. Census 2022 ACS. The City of Fort Wayne represents a substantial majority of the urban area population. The data and chart on page 6 show the percentages of adults who speak English less than "Very Well" by language category for the City of Fort Wayne. Additionally, zero households within Fort Wayne reported to the Census that their household was linguistically isolated, meaning that all household members over the age of fourteen had at least some difficulty with English.

The data and charts below display the primary language and number of individuals 5 and over that speak English "not well" or "not very well" at home. The top four language groups for each jurisdiction are displayed. Any remaining languages spoken in that jurisdiction are grouped into the "Other" category. The data is provided for each county within NIRCC's jurisdiction (Adams, Allen, DeKalb and Wells) and for the Cities of Fort Wayne and New Haven. The Cities of Fort Wayne and New Haven were included since the data indicated that within the Fort Wayne Urban Area, these two cities contained the highest proportion of LEP households.

Adams County: Language Spoken At Home

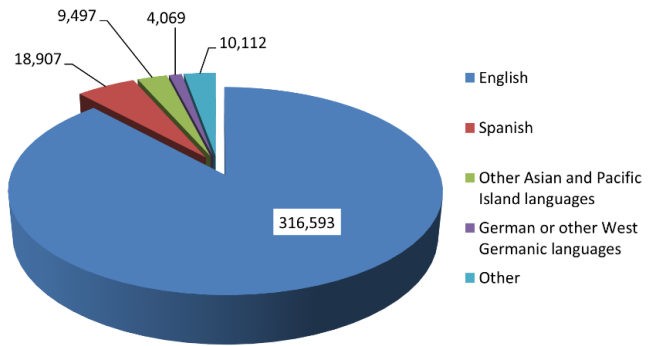


Data Source: 2022 Annual Community Survey

Adams County shows a high proportion (83.22%) of English-speaking residents with German representing the second most common language (14.85%). Spanish and Other Asian and Pacific Island languages are the other two notable languages spoken.

Allen County has a high proportion (88.14%) of English-speaking residents with Spanish (5.26%) representing the second most common language. Asian Languages and Germanic are two additional languages spoken but comprise small portions of the Allen County population.

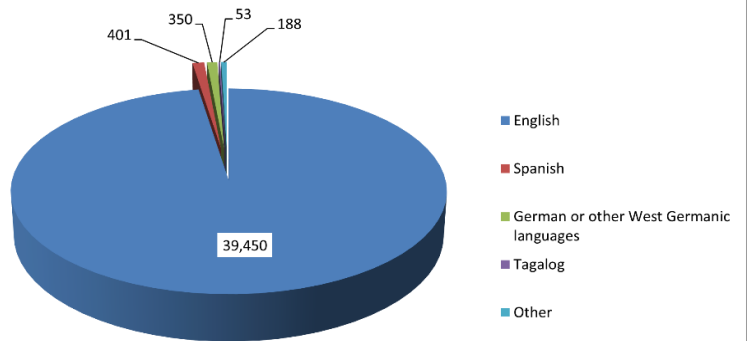
Allen County: Language Spoken At Home



Data Source: 2022 Annual Community Survey

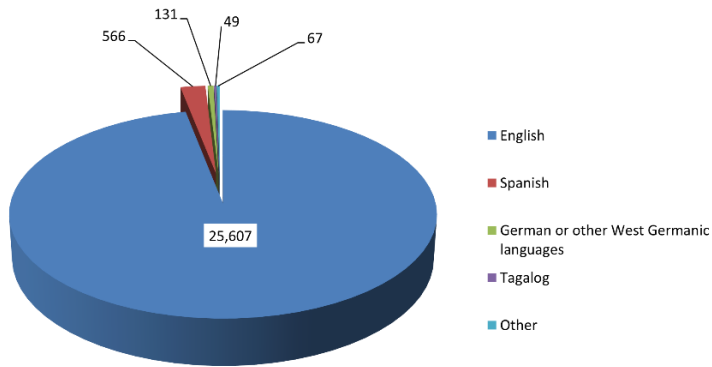
DeKalb County has an overwhelming share (97.55%) of residents speaking English and a relatively small proportion (0.99%) of the population speak Spanish. Germanic and Tagalog speaking populations are noted but comprise very small portions of the population.

DeKalb County: Language Spoken At Home



Data Source: 2022 Annual Community Survey

Wells County: Language Spoken At Home

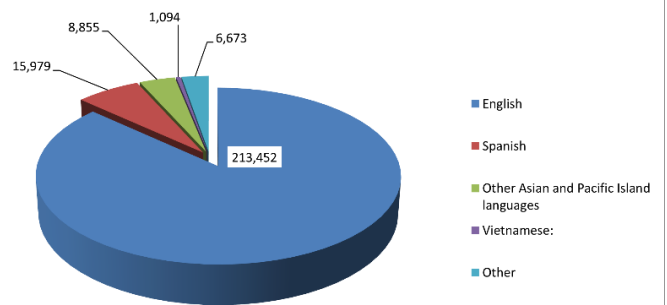


Data Source: 2022 Annual Community Survey

Wells County shows a high propensity of English-speaking residents (96.92%) and a relatively small proportion (2.14%) of the population speak Spanish. Germanic and Tagalog Languages comprise other notable spoken languages, but neither comprise a significant percentage of residents.

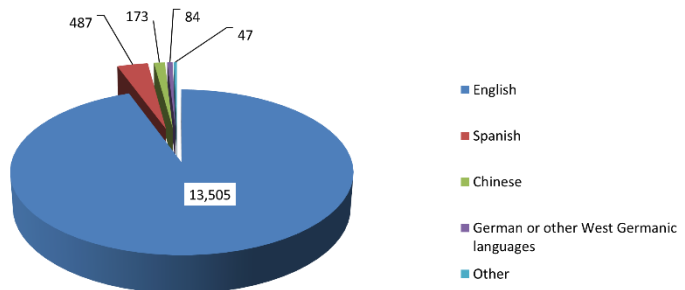
The City of Fort Wayne shows some of the highest diversity in the region regarding languages spoken at home. While English is significantly high (86.75%), the percentage of persons that speak Spanish (6.49%) is notable. Other Asian and Pacific Island languages and Vietnamese combine to make up 4.04% of the households.

Fort Wayne: Language Spoken At Home



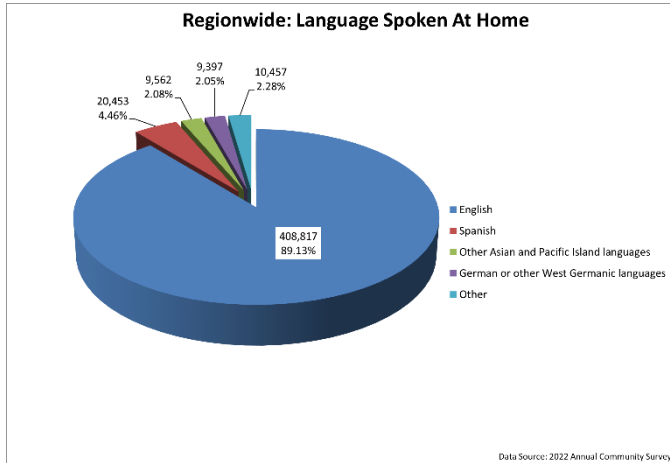
Data Source: 2022 Annual Community Survey

New Haven: Language Spoken At Home



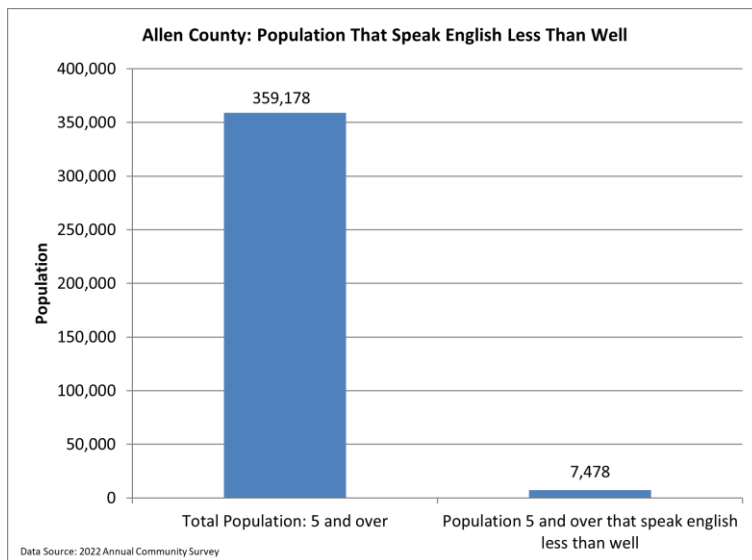
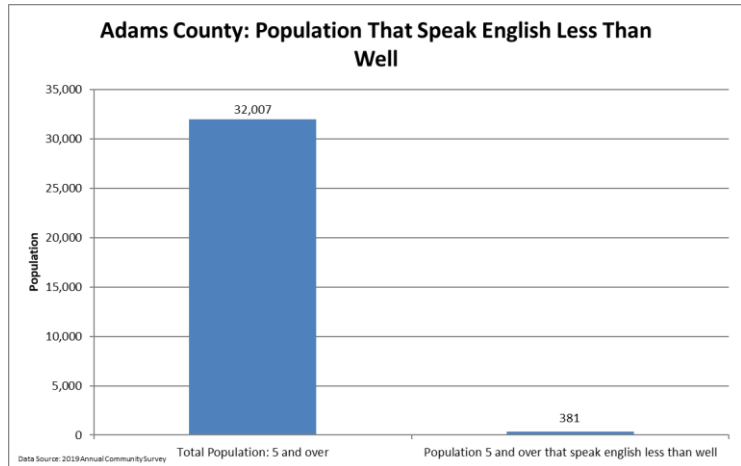
Data Source: 2022 Annual Community Survey

The City of New Haven shows a high proportion of English-speaking residents (94.47%) followed by Spanish (3.41%) as the second most common language. Germanic and Other languages comprise the remaining 0.92%.

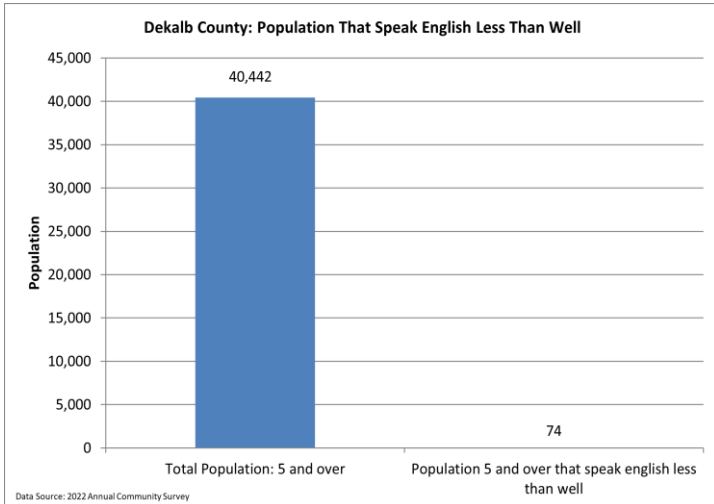


The NIRCC region comprising Adams, Allen, DeKalb and Wells Counties provides the following distribution of language spoken at home. English is the predominant language spoken by 89.13% of the population. Approximately 4.46% of the regional population speak Spanish, 2.08% speak Other Asian and Pacific Island languages, 2.05% speak German, and the remaining speak various other languages.

Adams County shows a large proportion (98.81%) of the population 5 and over speak English well or better. The remaining portion (1.19%) of the population 5 and over speak English less than well.

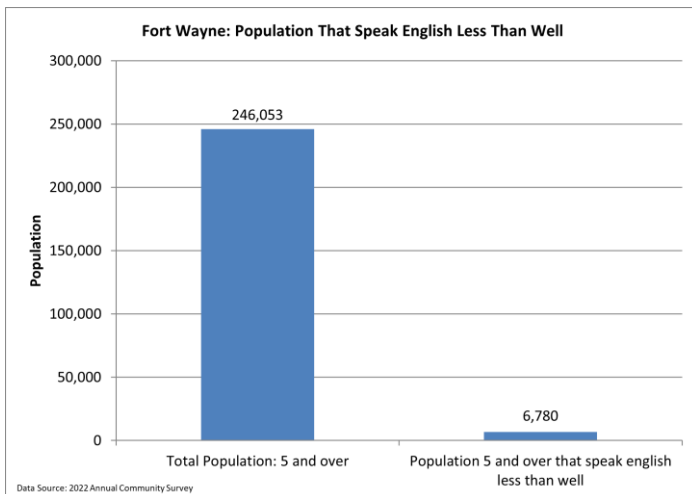
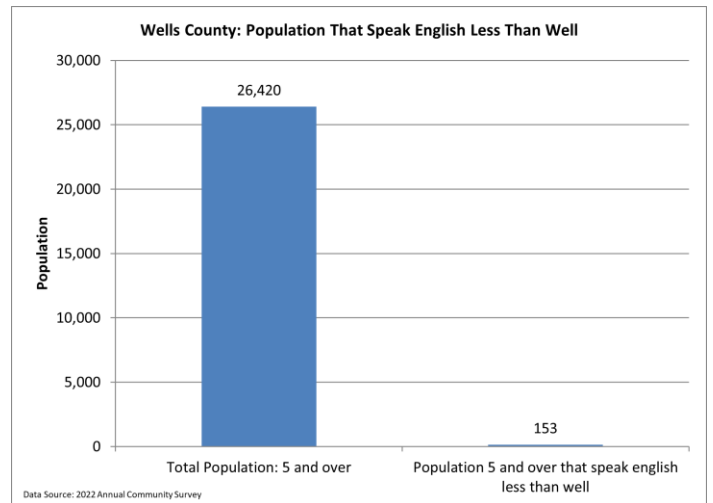


Allen County shows a large percentage (97.92%) of the population 5 and over speak English well or better. The remaining percentage (2.08%) of the population 5 and over speak English less than well.

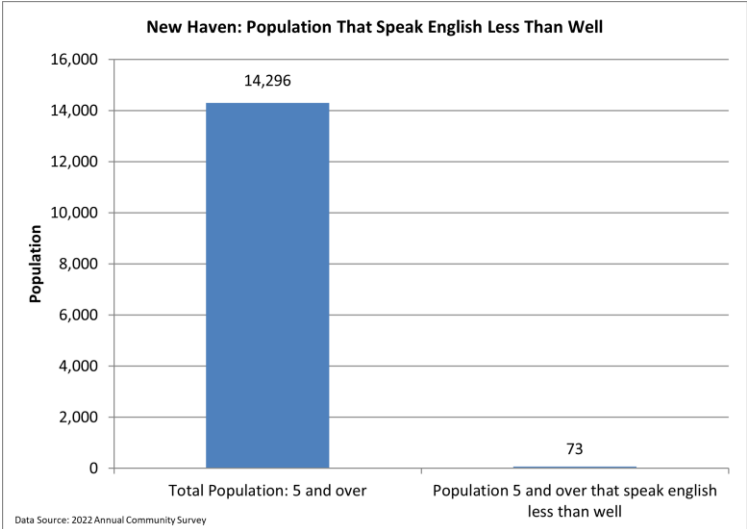


DeKalb County shows a large proportion (99.82%) of the population 5 and over speak English well or better. Only a small percentage (0.18%) of the population 5 and over speak English less than well.

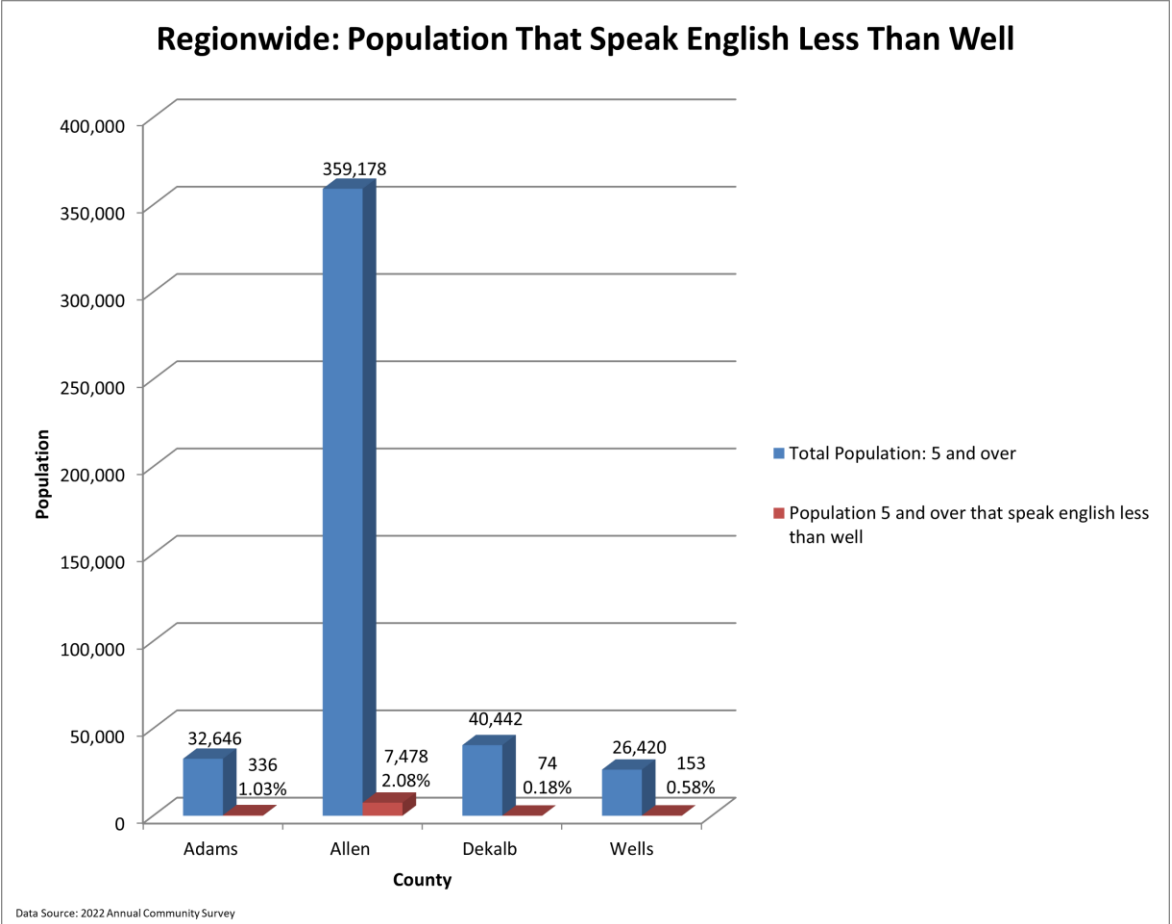
Wells County shows a large percentage (99.42%) of the population 5 and over speak English well or better. Only a small percentage (0.58%) of the population 5 and over speak English less than well.

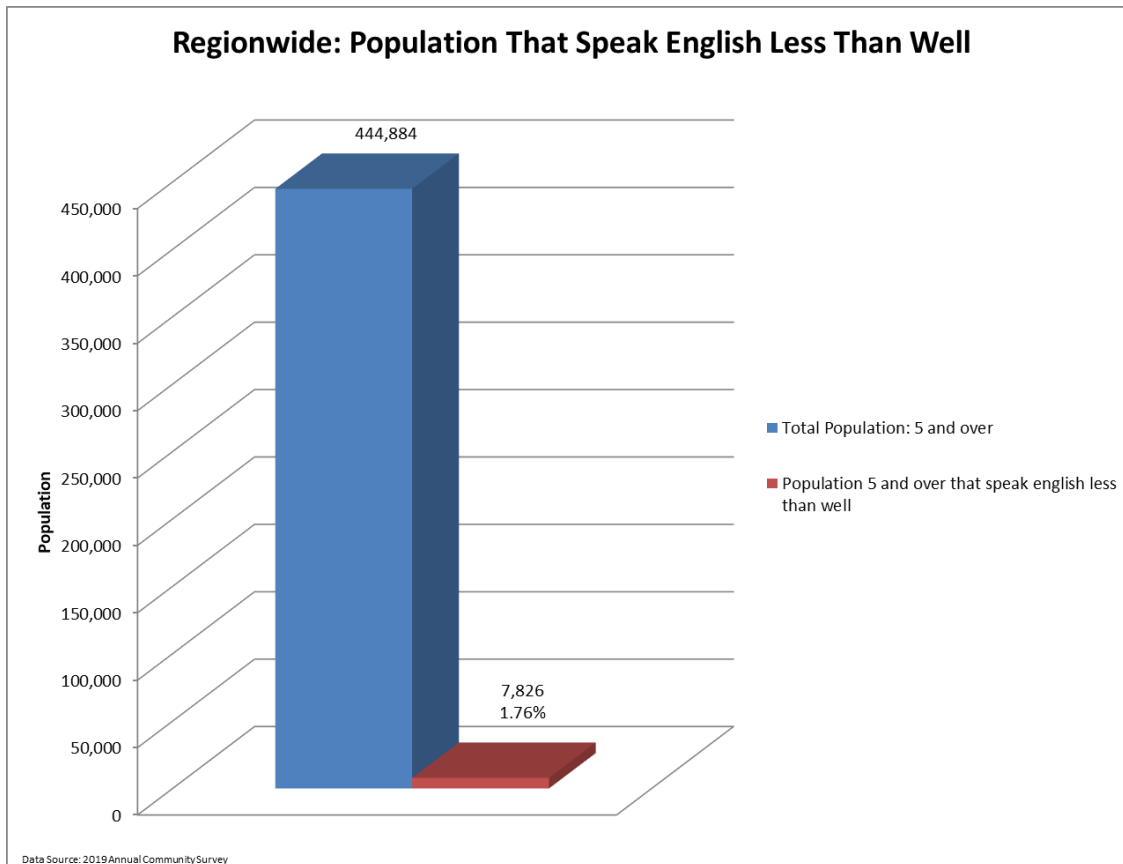


The City of Fort Wayne shows a large proportion (97.24%) of the population 5 and over speak English well or better. The remaining percentage (2.76%) of the population 5 and over speak English less than well.



The City of New Haven Shows a large percentage (99.49%) of the population 5 and over speak English well or better. Only a small percentage (0.51%) of the population 5 and over speak English less than well.





The NIRCC region comprising Adams, Allen, DeKalb and Wells Counties provides the following distribution of population who are 5 and over and what level they can speak English. The region shows a large proportion (98.24%) of the population 5 and over speak English well or better. The remaining percentage (1.76%) of the population 5 and over speak English less than well.

2. The frequency with which LEP persons come in contact with the program

The size of the LEP population in the NIRCC region is relatively small, with a concentration of the LEP population residing in the urbanized portion of Allen County including the Cities of Fort Wayne and New Haven. As these populations increase, the probability of their contact with the NIRCC also increases. However, at this time due to the small size of the LEP population and the nature of services provided by the NIRCC, LEP involvement is currently infrequent and unpredictable. No requests have been made for information by either individuals or groups.

3. The importance of the service provided by the program

The primary programs of the Northeastern Indiana Regional Coordinating Council use Federal funds to plan for future transportation projects and therefore do not include any service or

program that requires vital, immediate, or emergency assistance such as medical treatment or services for basic needs (food, housing, education, etc.). In addition, NIRCC does not conduct compulsory activities (applications, interviews, or other activities prior to participation in our programs and/or events). Involvement with the NIRCC or its committees is entirely on a voluntary basis. NIRCC does provide opportunities for the public to comment on and participate in the development of a Participation Plan, five-year Transportation Improvement Program, and a 20-plus year Long-Range Metropolitan Transportation Plan including air quality conformity analyses. The impacts of transportation improvements resulting from these actions do have an impact on all residents and efforts are made to encourage an understanding of the process and opportunities to comment. As a result, NIRCC is concerned with input from all stakeholders and every effort is made to make the planning process as inclusive as possible.

As a result of the regional transportation planning process, selected projects receive approval for Federal funding and progress toward project planning and construction under the responsibility of local jurisdictions or state transportation agencies. These state and local organizations have their own policies in place to ensure opportunities for LEP individuals to participate in the process that shapes where, how and when a specific project is implemented.

4. The resources available to the recipient

Because the LEP population in the region is not currently a significant proportion, the cost of translating large transportation plans is high, NIRCC has determined that full translation of regional transportation plans is not appropriate. The region is dynamic and continues to attract diverse ethnic and cultural populations. NIRCC will continue to evaluate LEP Populations as new data is made available and provide interpretive services as needed. Due to the informative nature of the Transportation Resource Guide produced by NIRCC, and the recognized Hispanic and Burmese populations that rely on public and non-profit transit services, NIRCC provides this guide in Spanish and Burmese. CITILINK, the transit operator in the Fort Wayne urban area, provides routes and other transit-oriented information in Spanish and Burmese. NIRCC will also make efforts to partner with state and local agencies to provide language translation and interpretation services within the scope of funding availability.

Meeting the Requirements: The NIRCC Limited English Proficiency Plan

Based on the current low levels of residents with Limited English Proficiency in the Northeast Indiana region and the limited interaction with NIRCC, a full LEP plan is not necessary at this time. Engaging the diverse population within the region is important and therefore NIRCC has completed the following assessment and policies for providing limited services to the LEP populations.

All language access activities detailed below will be coordinated by the NIRCC staff.

Identifying LEP Individuals Who Need Language Assistance

Key staff at the Northeastern Indiana Regional Coordinating Council will utilize language identification cards when first encountering an LEP individual. These cards, developed by the U.S. Census Bureau, have the phrase “Mark this box if you read or speak (name of language)” translated into 38 different languages. It was developed by the Census Bureau and is used by government and non-government agencies to identify the primary language of Limited English Proficient individuals during face-to-face contacts. The Language Identification flashcards will be made available at the front desk of the NIRCC offices. Staff will also utilize the American Red Cross of Northeast Indiana Multicultural Information exchange (MIX) program to assist with translation and interpretation services. The American Red Cross MIX Program can be reached by phone at 484-9336 ext. 242.

Language Assistance Measures

Language assistance will be provided for some LEP individuals through the translation of key materials, as well as through oral language interpretation when necessary and possible.

Translation of written materials

Translation of all NIRCC plans and materials is not possible due to cost restrictions and current population levels do not warrant such translations. NIRCC will provide the Transportation Resource Guide in Spanish and Burmese. NIRCC will consider translating other documents and program materials if sufficient requests are received and resources are available for the translation services. NIRCC will use visual aids and translators to present materials as appropriate. NIRCC has a new website that provides language translation and meets Web Content Accessibility Guidelines (WCAG) Version 2.1, Level AA.

NIRCC will provide Spanish-language outreach materials from organizations such as federal, state, and local transportation agencies when available. Current NIRCC outreach materials will not be translated. NIRCC will consider requests to provide key outreach materials in Spanish as new materials are developed.

Oral Language Services

NIRCC will provide limited oral language services to Spanish-speaking LEP individuals through translation and interpreter services. Requests for interpretive services must be made in advance to allow time to secure the appropriate resources. NIRCC will engage the American Red Cross of Northeast Indiana’s Multicultural Information exchange (MIX) program to the fullest extent possible for translation and interpretation services to minimize the expenditure of resources. It is anticipated that the primary points of contact with LEP individuals are at the reception/lobby area on the NIRCC offices and at Public Meetings. Additional points of contact will be documented based on interaction with LEP individuals. If contact becomes consistent, or

if a special situation arises that requires translation, additional resources will be engaged as appropriate.

Staff training

In order to establish meaningful access to information and services for LEP individuals, employees in public contact positions are aware of the NIRCC LEP policies and procedures.

Monitoring and Updating the LEP Plan

The Northeastern Indiana Regional Coordinating Council will monitor changing population levels and the language needs of LEP individuals in the region. If requests for translation and/or interpretive services increase and become more common, NIRCC will evaluate additional strategies and available resources. NIRCC will review this LEP plan in concurrence with the review of the Participation Plan. The NIRCC Participation Plan is reviewed and evaluated on a four-year cycle. NIRCC staff will keep a record of any LEP services provided and will use this information as part of the review process.

LEP complaint processing

The Northeastern Indiana Regional Coordinating Council has established the following complaint procedure and process that meets Title VI requirements.

Discrimination Policy

Title VI of the Civil Rights Act prohibits discrimination on the basis of race, color or national origin in programs or activities receiving federal financial assistance. In the spirit of Title VI requirements, NIRCC will strive to provide equal access to services and benefits to those individuals with Limited English Proficiency (LEP) including minority and low-income groups. The rights of women, the elderly and the disabled are protected under related statutes.

Title VI prohibits the following actions for recipients of federal assistance. Recipients (hereinafter sometimes referred to as Recipient(s) or Subrecipient(s) of federal assistance (either directly or through contractual means), on the grounds of race, color, or national origin shall not:

1. Deny a person the chance to participate as a member of a planning or advisory body that is an integral part of the program.
2. Provide a service or benefit to an individual that is inferior (either in quantity or quality) to what was provided to others in the program.
3. Provide an individual with a service or benefit in a manner different from others under the program.
4. Address an individual in a manner that denotes inferiority because of race, color, or national origin.
5. Subject an individual to segregation in any manner related to the receipt of services or benefits under the program.

6. Subject an individual to separate treatment in any manner related to receiving services or benefits under the program.
7. Restrict an individual in any way in the receipt of any advantage or privilege enjoyed by others under the program.
8. Require different standards or conditions as prerequisites for accepting an individual into a program.
9. Deny an individual any service or benefit provided under the program.
10. Use criteria or methods of administration which have the effect of subjecting individuals to discrimination or operate to defeat or substantially impair the accomplishment of the objectives of the program.
11. Permit discriminatory activity in a facility built in whole or in part with federal funds.
12. Fail to provide service or information in a language other than English when significant numbers of potential or actual beneficiaries are of limited English-speaking ability.
13. Fail to advise the population eligible to be served or benefited by the program of the existence of the program.
14. Subject an individual to discriminatory employment practices under any federally funded program whose object is to provide employment.
15. Locate a facility in any way that would limit or impede access to a federally funded service or benefit.

Complaint Procedure

As a recipient of federal financial assistance, the Northeastern Indiana Regional Coordinating Council has in place the following Title VI complaint procedure.

Submit complaint: Any person who believes that he or she, or any specific class of persons, has been subjected to discrimination or retaliation, from the Northeastern Indiana Regional Coordinating Council's administration of federally funded programs, as prohibited by Title VI of the Civil Rights Act of 1964, as amended, and related statutes, may file a written complaint. Such complaints must be filed within 30 calendar days after the date the person believes the discrimination occurred.

Submit written complaints to:

Daniel S. Avery, Executive Director
Northeastern Indiana Regional Coordinating Council
200 East Berry Street, Suite 230
Fort Wayne, IN 46802

1. Complaints shall be in writing and shall be signed by the complainant and/or the complainant's representative. Complaints shall set forth as fully as possible the facts and circumstances surrounding the claimed discrimination and shall include the following information:

- Name, address, and phone number of the Complainant.
- A written statement of the complaint, including the following details:

(a) Basis of complaint (i.e., race, color, national origin or language, disability, religion, familial status, or retaliation).

(b) The nature of the incident that led the complainant to feel discrimination was a factor.

(c) A detailed explanation of the alleged discriminatory act(s).

(d) The date or dates on which the alleged discriminatory event or events occurred.

(e) If applicable, name(s) of alleged discriminating official(s).

- Other agencies (state, local or Federal) where the complaint is also being filed (optional).
- Complainant's signature and date.

2. **Review and Response:** Upon receipt of the Complaint, the NIRCC Executive Director shall appoint one or more staff as review officers to evaluate and investigate the complaint. Upon completion of the review, the staff review officer(s) shall make a recommendation regarding the merit of the Complaint and whether remedial actions are available to provide redress. Additionally, the staff review officer(s) may recommend improvements to NIRCC's processes relative to Title VI and environmental justice, as appropriate.

The staff review officer(s) shall forward their recommendations to the NIRCC Board for concurrence. If the Board concurs, the Executive Director shall issue the NIRCC's written response to the Complainant. This response shall be issued no later than 30 calendar days after the date the Executive Director received the Complaint. If more time is required, the Executive Director shall notify the complainant of the estimated timeframe for completing the review.

3. **Appeal:** The Complainant may appeal against the Executive Director's response to the Complaint by submitting a written appeal to the NIRCC Chair no later than 15 calendar days after receipt of the Executive Director's written response. A response to any appeals will be issued by the NIRCC Chair within 15 days of receipt.

4. Submission of Complaint to the Indiana Department of Transportation: If the Complainant is dissatisfied with the NIRCC's resolution of the Complaint, he or she may also submit a complaint to the Indiana Department of Transportation for investigation. In accordance with Chapter VII, Title VI Discrimination Complaints, of Federal Transit Administration Circular 4702.1A, such a complaint must be submitted within 180 calendar days after the date of the alleged discrimination. Chapter IX of the FTA Circular 4702.1A, which outlines the complaint process to the Department of Transportation, may be obtained online at <http://www.fta.dot.gov/>.

These procedures do not deny the right of the complainant to file formal complaints with other state or Federal agencies or to seek private counsel for complaints alleging discrimination. These procedures are part of an administrative process that does not provide for remedies that include punitive damages or compensatory remuneration for the complainant.

For more information, please contact Daniel Avery at 260-449-7309 or dan.avery@co.allen.in.us.