

DRAFT 2025 TITLE VI PROGRAM

1. GENERAL REQUIREMENTS (CH.III)

TITLE VI- NOTICE TO PUBLIC



Tammy Corn, Executive Director
Kokomo/Howard County
Governmental Coordinating Council
219 East Sycamore St.
Kokomo, Indiana. 46901
765.456.2338

Federal Transit Administration
Title VI Program Civil Rights
200 West Adams Street
Suite 320
Chicago, IL 60606
Telephone: (312) 353-2789

Re: Statement of Policy and Public Notice

Civil Rights Office Representative,

This letter is to confirm we the grantee under 5307 have our Title VI Statement of Policy (Public Notice) posted on our website www.kokomompo.com, in our administrative offices, meeting areas, on our vehicles, in our lobby, in our policy and in our rider's guide.

Thank you for your consideration in this matter.

Sincerely,


Tammy Corn



About KHCGCC



No Person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination. If you feel you have been discriminated against, you are encouraged to contact the KHCGCC office at: 219 E Sycamore Street, Kokomo Indiana 46901 765-456-2336

The Kokomo and Howard County Governmental Coordinating Council is the Metropolitan Planning Organization (MPO) for the Kokomo, Indiana urbanized area. The Council was designated as the MPO on January 23, 1981. It succeeded the Kokomo-Howard County Administrative Committee and Technical Committee. They were created on February 14, 1964.

The primary responsibility of the Coordinating Council (KHCGCC) is to carry out transportation planning responsibilities for the Kokomo Metropolitan Planning Area. This is an area bound by County Road 600 North, to County Road 500 South, County Road 500 West and County Road 500 East.

Finally, our mission is to work closely with the City of Kokomo and Howard County governments, local planning agencies, stakeholders, our federal partners and residents to provide a better quality of life for all. Planning efficient, safe, accessible multi-modal systems while maintaining economic vitality, safeguarding the environment and using the principles of Continuous, Cooperative and Comprehensive 3C planning process.

The Policy Board and Technical Advisory Committee evaluates and approves proposed Transportation Improvement Program (TIP) projects along with public input into funding. KHCGCC conducts studies and assists local municipalities with planning activities. KHCGCC develops the City / County Long Range Transportation Plan serving approximately 70,000 people.

Public Involvement in the Kokomo and Howard County Governmental Coordinating Council's transportation planning process is invited and encouraged. Opportunities for public participation include all Policy Board meetings, Technical Advisory Committee meetings, and special hearings to discuss the Long Range Transportation Plan and Transportation Improvement Program. You may also click on Contact Us to provide specific comments.

LEARN MORE



HOME

DEPARTMENTS

RESIDENTS

BUSINESSES

VISITORS

HOW DO I? (FAQ)

TITLE VI NOTICE TO THE PUBLIC

RELATED PAGES

Employment Opportunities

For City Employees

Forms and Applications

Kokomo Howard Wellness Center

Title VI Notice to the Public

Title VI Implementation Plan

Disadvantaged Business Enterprise Program - DBE -

REGISTRATION WITH KOKOMO BY CO-OPERS TITLE VI NOTICE TO THE PUBLIC

TITLE VI NOTICE TO THE PUBLIC

Title VI Notice to the Public

Title VI and related Nondiscrimination authorities stipulate that no person in the United States of America shall on the grounds of race, color, national origin, sex, age, disability, income level or limited English proficiency be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal financial assistance.

Any person who desires more information regarding the City of Kokomo's Title VI Program can contact its Title VI Program Coordinator - Sarah Spencer - at the address noted below.

Any person who believes they have (individually or as a member of any specific class of persons) been subjected to discrimination on the basis of race, color, national origin, sex, age, disability, income level or limited English proficiency has the right to file a formal complaint. Any such complaint must be in writing and submitted within 180 days following the date of the alleged occurrence to:

Sarah Spencer
City of Kokomo
100 S Union St.
Kokomo, IN 46901
(765) 456-7460

Information regarding the City of Kokomo's Title VI obligations

2. GENERAL REQUIREMENTS (CH.III)

TITLE VI- COMPLAINT PROCEDURE

CITY OF KOKOMO TRANSIT SYSTEM



TITLE VI Non-Discrimination

COMPLAINT PROCEDURE

No person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be other wise subjected to discrimination.

If you feel you have been discriminated against, you are encouraged to contact the City of Kokomo Human Resource office at 765-456-7470 or by e-mail at sspencer@cityofkokomo.org or by mail at:

City of Kokomo
100 S. Union St.
Kokomo, IN. 46901



TITLE VI Non-Discrimination

COMPLAINT PROCEDURE

No person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination.

If you feel you have been discriminated against, you are encouraged to contact the KHC GCC office at 765-456-2336 or by e-mail at khcgcc@aol.com or by mail at:

**KHC GCC
219 East Sycamore St.
Kokomo, IN 46901.**

Title VI Complaint Procedure:

What is Title VI of the Civil Rights Act of 1964?

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color and national origin in programs and activities receiving Federal financial assistance.

City of Kokomo Transportation system is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.B If you believe you have been subjected to discrimination under Title VI, you may file a complaint.

How do I file a Title VI Complaint?

You may file a signed, written complaint up to one hundred and eighty (180) days from the date of alleged discrimination. The complaint should include the following information:

Title VI Compliant

Title VI Coordinator- City of Kokomo HR Director
100 S. Union St.
Kokomo, IN. 46901
By phone: 765-456-7460 (Business Office)
By Facsimile: 765-456-7572

Re: Transportation Department

How will I be notified of the outcome of my complaint?

The City of Kokomo Transportation department will send a final written response to the complainant and advise the complainant of his or her right to: 1) appeal within 7 calendar days of receipt of the final written decision from the City of Kokomo's Transportation Department and/or 2) file a complaint externally with the U.S. Department of Transportation and/or the Federal Transit Administration. Every effort will be made to respond to Title VI complaints within 60 working days of receipt of such complaints, if not sooner.

Can I file a complaint with another agency or organization?

In addition to the complaint process described above, you may file a Title VI complaint with the following offices:

Federal Transit Administration
Region V Office of Civil Rights
Attention: Title VI Program Coordinator
200 West Adams Street
Suite 320
Chicago, IL 60606
Telephone: (312) 353-2789
Fax: (312) 886-0351

Include date of application.

3. GENERAL REQUIREMENTS (CH.III)

TITLE VI- COMPLAINT FORM

Title VI Complaint Form

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

Note: The following information is necessary to assist us in processing your complaint. Should you require any assistance in completing this form, please let us know. 219 East Sycamore St. Kokomo, IN. 46901

1. Complainants' Name _____
2. Street Address _____
3. City, State and Zip Code _____
4. Telephone Number (home) _____ business _____
Cell _____
5. Person discriminated against (if someone other than the complainant)
Name _____
Address _____
City, State and Zip Code _____
6. Which of the following best describes the reason you believe the
Discrimination took place? Was it because of your: (check reason)
a. Race/Color _____ c. Age _____
b. National Origin _____ d. Disability _____
7. What date did the alleged discrimination take place and the location?
Explain what happened and whom you believe was responsible. Please use the back of
this form if additional space is required.

8. 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
9. Please provide information about a contact person at the agency/court where
The complaint was filed.
Name _____
Address _____
City, State and Zip Code _____
Telephone Number _____

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

Complainant's Signature

Date



CITY OF KOKOMO

**COMPLAINT FORM
KOKOMO HUMAN RIGHTS COMMISSION**

DATE: _____ PERSON COMPLETING: _____

NAME: _____ CONTACT PHONE#: _____

ADDRESS: _____ CITY: _____ STATE: _____ ZIP: _____

COMPLAINT AGAINST: _____

ADDRESS: _____ CITY: _____ STATE: _____ ZIP: _____

COMMENTS: _____

CAUSE OF DISCRIMINATION BASED ON: RACE _____ SEX _____ RELIGION _____ COLOR _____

HANDICAP _____ NATIONAL ORIGIN _____ RETALIATION _____

OTHER (explain) _____

TYPE OF DISCRIMINATION: EMPLOYMENT _____ EDUCATION _____ ACCOMODATION _____

DATE OF MOST RECENT DISCRIMINATION: _____

PLACE: _____

PARTICULARS: (use backside if necessary)

1. WHO DISCRIMINATED AGAINST YOU: _____

2. HOW WERE YOU DISCRIMINTATED AGAINST: _____

3. WERE THERE ANY WITNESSES TO THIS DISCRIMINATION: YES _____ NO _____

NAME CONTACT INFORMATION: _____

**I SWEAR OR AFFIRM UNDER PENALTIES OF PERJURY THAT I HAVE READ THE COMPLAINT
AND THAT IT IS TRUE TO THE BEST OF MY KNOWLEDGE, INFORMATION, AND BELIEF.**

NAME DATE

SUBSCRIBED AND SWORN TO BEFORE ME THIS _____ DAY OF _____, _____ (YEAR)

MY COMMISSION EXPIRES: _____

NOTARY PUBLIC

4. GENERAL REQUIREMENTS (CH.III)

LIST OF TRANSIT-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS, AND
LAWSUITS



Tammy Corn, Executive Director
Kokomo/Howard County
Governmental Coordinating Council
209 South Union Street
Kokomo, Indiana. 46901
765.456.2338

Federal Transit Administration
Title VI Program Civil Rights
200 West Adams Street
Suite 320
Chicago, IL 60606
Telephone: (312) 353-2789

Date: May 5, 2025

Re: List of Transit-Related Title VI Investigations

Civil Rights Office Representative,

This letter is to report, as a grantee under 5307 we have had two Transit-Related Title VI investigations, complaints, and/or lawsuits (see below).

Fixed Route passenger, December 2022: excerpt from the Indiana Civil Rights Commission's finding states: *The evidence does not substantiate complaints' allegations. Rather, evidence shows the only verifiable incident in which the Complainant was unable to board the transit system was due to his error in which stop he was waiting at. In addition, Complainant admitted during an interview with the Commission he felt his race was not a factor in the treatment he alleged by Respondent.*

Paratransit applicant, August 2024: Applicant alleged he was discriminated against when denied recertification for paratransit service. *This is still pending.*

Thank you for your consideration in this matter.

Sincerely,



Tammy Corn

5. GENERAL REQUIREMENTS (CH.III)

PUBLIC PARTICIPATION PLAN



Tammy Corn, Executive Director
Kokomo/Howard County
Governmental Coordinating Council
219 E. Sycamore Street
Kokomo, Indiana. 46901
765.456.2338

Federal Transit Administration
Title VI Program Civil Rights
200 West Adams Street
Suite 320
Chicago, IL 60606
Telephone: (312) 353-2789

Date: May 5, 2025

Re: Summary of outreach

Civil Rights Office Representative,

This letter is to confirm we, the grantee under 5307 in conjunction with our Public Participation Plan adhere to all guidance for public outreach.

As a recipient of federal funds, steps are taken to ensure comments and concerns are obtained from our residents and especially our residents that are at a disadvantage. During the period from our last Title VI approval all projects that were federally funded we submitted public comments to stakeholders and the general public. The information is also dispersed via the following methods:

- Public meetings
- Request for public involvement posted on Facebook and websites
- Posted in the City of Kokomo Municipal building (both elevators)
- Canvassing for surveys
- Rider surveys

A hard copy of documents along with comment forms are offered at the following locations:

Public libraries
United Way
Center Township Trustee's office
Housing Authority
Rescue Mission
Transit office and lobby
Caver Center
Distributed to our CAC, TAC and Policy Board members
Urban Outreach
CAM (Coordinated Assisted Ministries)
Workforce Development

Sincerely,

A handwritten signature in blue ink that reads "Tammy Corn." The signature is fluid and cursive, with a large initial "T" and a trailing period.

Tammy Corn



INVITATION FOR POTENTIAL CITIZENS' ADVISORY COMMITTEE (CAC) MEMBERS

Kokomo and Howard County
Governmental Coordinating Council (KHCGCC)
219 E. Sycamore St.
Kokomo, IN 46901
765.456.2336

Date:

The KHCGCC is committed to excellence in its efforts to serve the entire Kokomo and Howard County area. We work toward having boards and committees that represent a variety of population demographics. To help us achieve this goal, we reach out to our stakeholders, leaders in business and industry, community leaders, local government, and transit riders by asking them to work with us in an advisory capacity to improve our programs and projects.

The KHCGCC is currently seeking people to participate on our Citizens' Advisory Committee (CAC). The committee plays an important role as an advisory body to help ensure safe, efficient, reliable transit with world-class customer service for all patrons.

The CAC meets on a quarterly basis and the meetings are usually held to one hour or less. The committee members not only help ensure safe and reliable transit, but they also oversee the transit application process and weigh in on any denial appeals.

Please indicate your willingness to serve on this committee by calling or emailing the Kokomo and Howard County Governmental Coordinating Council (KHCGCC):

Email: tcorn@kokomompo.com, in the subject line, please type CAC.
Call 764.456.2338 Tammy Corn.

We look forward to making our community better with your assistance.

Sincerely,

A handwritten signature in blue ink that reads 'Tammy Corn'.

Tammy Corn, Executive Director
Kokomo and Howard County
Governmental Coordinating Council (KHCGCC)

6. GENERAL REQUIRMENTS (CH.III)

LANGUAGE ASSISTANCE PLAN

P.9 in the City of Kokomo's

Title VI Nondiscrimination Implementation

Plan and Policy



Tammy Corn, Executive Director
Kokomo/Howard County
Governmental Coordinating Council
219 E. Sycamore Street
Kokomo, Indiana. 46901
765.456.2338

Federal Transit Administration
Title VI Program Civil Rights
200 West Adams Street
Suite 320
Chicago, IL 60606
Telephone: (312) 353-2789

Date: May 5, 2025

Re: LEP waiver request

Civil Rights Office Representative:

With the limited population in our area that speaks little to no English, I would respectfully request a waiver for the LEP Plan.

Within our Title VI documents uploaded to TrAMS included our complaint form and process; to date the City of Kokomo has had **no** complaints regarding language barriers for our transit systems, investigations or lawsuits filed against them and is in compliance with 4702.1B.

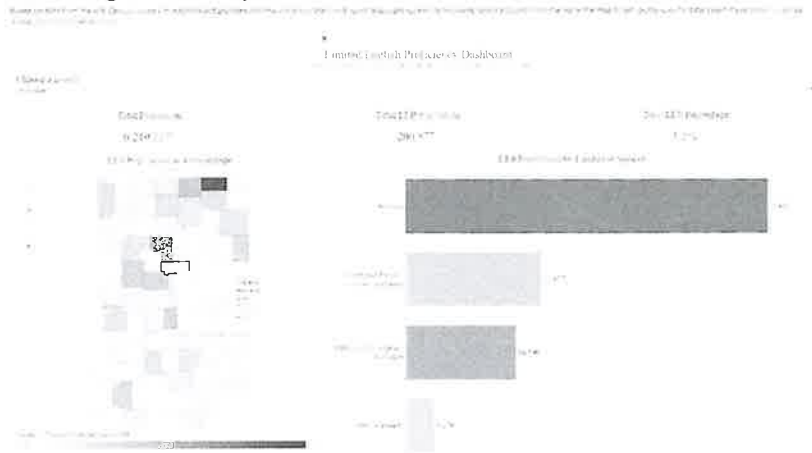
We are requesting a waiver not to have to develop a specific "Plan" at this time as we believe we fall under the threshold required. We do recognize the importance of all citizens having the ability to communicate and although a LEP Plan may not be required, as there has been no communication issues within our transportation systems to date. The City of Kokomo has addressed LEP in their Title VI plan, as well as there are several different avenues, we offer our citizens if there were to be a request:

- Local law enforcement agency provides Spanish interpretation (our highest measurable non-English language used). Available 24hrs a day, 365 days a year.
- United Way of Howard County 211 referral line offers multiple language translation assistance.
- Our website offers Google Translator.
- We offer 'I Speak' cards to help identify what language someone may need help translating.
- Several city employees are bi/multi-lingual.

- Optimum Translation Service to translate documents if ever needed.

The following are demographics showing the concentration of English Proficiency issues in our area; taken from the US Census. Showing a total, 1.6% LEP from the Indiana.gov (see table 3) for Howard County Indiana.

Limited English Proficiency in Indiana



Race and Hispanic Origin

White alone, percent	82.4%	75.6%
Black or African American alone, percent	11.0%	13.6%
American Indian and Alaska Native alone, percent	0.7%	1.3%
Asian alone, percent	1.6%	6.1%
Native Hawaiian and Other Pacific Islander alone, percent	0.0%	0.3%
Two or More Races, percent	3.1%	2.6%
Hispanic or Latino, percent	4.3%	18.9%
White alone, not Hispanic or Latino, percent	80.0%	59.3%

Population Characteristics

Veterans, 2016-2020	4,027	17,835,456
Foreign born persons, percent, 2016-2020	2.5%	13.5%

Housing

Housing units, July 1, 2021, (V2021)	X	142,153,010
Owner-occupied housing unit rate, 2016-2020	65.4%	64.4%
Median value of owner-occupied housing units, 2016-2020	\$93,300	\$229,800
Median selected monthly owner costs -with a mortgage, 2016-2020	\$484	\$1,621
Median selected monthly owner costs -without a mortgage, 2016-2020	\$325	\$509
Median gross rent, 2016-2020	\$741	\$1,056
Building permits, 2021	X	1,736,982

Families & Living Arrangements

Households, 2016-2020	25,536	122,354,219
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Howard County Indiana information from <https://www.in.gov/judiciary/language/>

This organization has operated since inception without an active LEP Plan and has never been informed of, or received, a Title VI Compliance Review, additionally our Title VI program was included in our triennial review dated October 2024 and no deficiencies were found.

We will continually monitor if our residents need changes, as it is our mission to provide transportation to all in need.

Thank you for your consideration in this matter.

Sincerely,

Tammy Corn
Tammy Corn

All

Tables

Maps

Charts

Profiles

Pages

P9 | HISPANIC OR LATINO, AND NOT HISPANIC OR LATINO BY RACE

Decennial Census

Universe: Total population

2020: DEC Demographic and Housing Characteristics

Notes

Geos

Topics

Codes 123

Dataset

Label

Howard County, Indiana

▼ Total:	83,658
Hispanic or Latino	3,060
▼ Not Hispanic or Latino:	80,598
▼ Population of one race:	76,447
White alone	68,470
Black or African American alone	6,416
American Indian and Alaska Native alone	209
Asian alone	1,027
Native Hawaiian and Other Pacific Islander alone	19
Some Other Race alone	306
▼ Population of two or more races:	4,151
▼ Population of two races:	3,935
White; Black or African American	1,586
White; American Indian and Alaska Native	1,402
White; Asian	310
White; Native Hawaiian and Other Pacific Islander	27
White; Some Other Race	486
Black or African American; American Indian and Alaska Native	32
Black or African American; Asian	22
Black or African American; Native Hawaiian and Other Pacific Islander	0
Black or African American; Some Other Race	41
American Indian and Alaska Native; Asian	8
American Indian and Alaska Native; Native Hawaiian and Other Pacific Islander	0
American Indian and Alaska Native; Some Other Race	4
Asian; Native Hawaiian and Other Pacific Islander	13
Asian; Some Other Race	4

County Seat: Kokomo

Largest City: Kokomo (2023 population: 59,890)

Population per Square Mile: 286.87

Square Miles: 293.10

[Go to county's in.gov site](#)

Population over Time	Number	Rank in State	Percent of State	Indiana
Yesterday (2020)	83,658	18	1.3%	6,484,050
Today (2024)	84,082	20	1.2%	6,924,275
Tomorrow (2030 projection)*	84,281	21	1.2%	7,013,509
Percent Change 2020 to Today	0.5%	35		2.0%

*Projection based on 2020 Census population estimates.

Sources: U.S. Census Bureau; Indiana Business Research Center

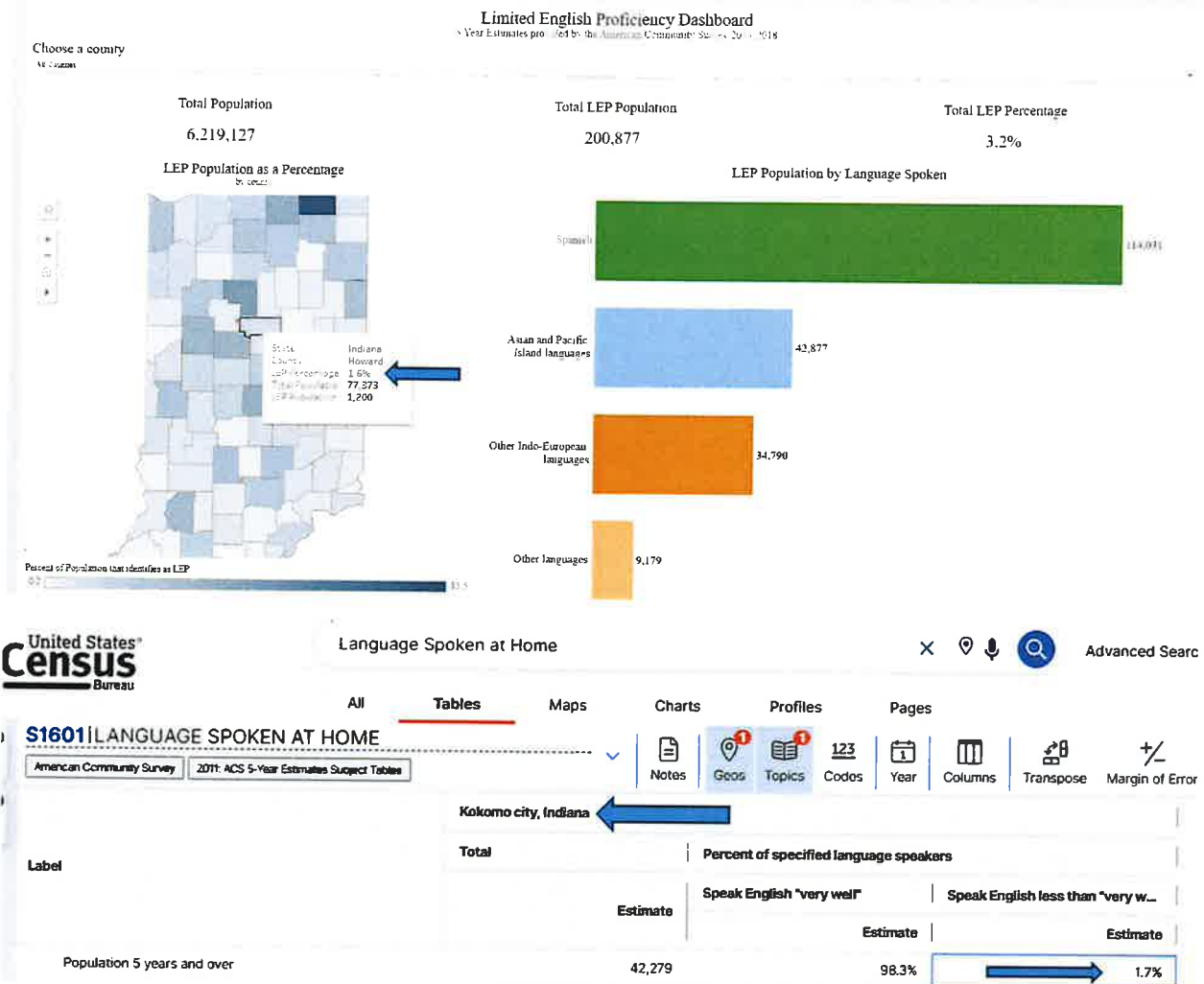
Components of Population Change, 2023-2024	Number	Rank in State	Percent of State	Indiana
Net Domestic Migration	394	14		4,268
Net International Migration	52	41		30,852
Natural Increase (births minus deaths)	-218	89	-2.4%	9,159

Population Estimates by Race and Hispanic Origin, 2023	Number	Rank of	Pct Dist. in County	Pct Dist. in State
American Indian or Alaska Native Alone	426	20	0.5%	0.5%
Asian Alone	1,133	22	1.4%	2.9%
Black Alone	7,010	16	8.4%	10.4%
Native Hawaiian and Other Pac. Isl. Alone	57	23	0.1%	0.1%
White	72,422	22	86.4%	83.7%
Two or More Race Groups	2,783	18	3.3%	2.5%
Hispanic or Latino Origin (can be of any race)				
Non-Hispanic	80,259	19	95.7%	91.2%
Hispanic	3,572	26	4.3%	8.8%

The following are demographics showing the concentration of English Proficiency issues in our area; taken from the US Census. Showing a total, 1.6% LEP for all of Howard County (the transit system is only within the Kokomo City limits) from Indiana.gov (see table 3).

Limited English Proficiency in Indiana

Based on data from the U.S. Census Bureau, this dashboard provides information about the non-English languages spoken by Hoosiers. Select a county from the list or the map to get county-specific data. Learn more about language access plans for Indiana courts.



This organization has operated since inception without a LEP Plan and has never been informed of or received a Title VI Compliance Review or language barrier complaint. Additionally, our Title VI program was included in our triennial review August 2024 and no deficiencies were found.

We will continually monitor if our residents' language needs change, as it is our mission to provide transportation to all.

Thank you for your consideration in this matter.

Sincerely,

Tammy Corn
Tammy Corn

7. GENERAL REQUIREMENTS (CH.III)

TABLE DEPICTING COMMITTEES & COUNCIL BROKEN DOWN BY RACE

APPENDIX F

Table depicting membership on Committees, Councils, and Boards. Broken down by Race:

Body	Caucasian	Latino	African American	Asian American	Native American
Population	77.63%	4.25%	10.4%	<1.5%	<1.0%
Policy Board	80%	0%	20%	0%	0%
Tech. Adv. Com	100%	0%	0%	0%	0%
Transit Adv. Com	90%	0%	10%	0%	0%

TABLE DEPICTING REPRESENTATION ON COMMITTEES AND COUNCILS

Background

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 membership of those committees broken down by race, and a description of efforts made to encourage the participation of minorities on such committees.

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

Body	Caucasian	Hispanic/Latino	African American	Asian American	American Indian/Alaskan
Population 83,658 Ho. Co.	81.85%	3.66%	7.67%	1.23%	0.25%
Policy Board	80%	0%	20%	0%	0%
Citizens Advisory Council (CAC)	90%	0%	10%	0%	0%
Technical Advisory Committee (TAC)	90%	0%	10%	0%	0%

The KHCGCC, Howard county, and the City of Kokomo are committed to excellence in its efforts to serve the entire Kokomo and Howard County area. We work toward having boards and committees that represent “demographic diversity,” as well as “equity” and “inclusion.”

While demographic diversity simply means “a range of differences along dimensions of race, ethnicity, disabilities, education, language, socioeconomic status, age, and gender.” Equity refers to “ensuring fair treatment, equal access, and equal opportunity for advancement for all members of our society – understanding and striving to remove systematic barriers that block achievement.” Inclusive means making sure people feel that they belong. When board and committee members feel included, they are encouraged to let their opinions, backgrounds, language, ideas, ethnicity, etc. be known and they participate and fully engage in the governing process.

Although the Policy Board and the Technical Advisory Committee (TAC) are defined by positions held within the community. We actively recruit Citizens Advisory Committee (CAC) members by word of mouth from our current and past committee members, postings in our transit area, the United Way, the Carver Center, the local library, social media, our website, etc.

8. GENERAL REQUIREMENTS (CH.III)

MONITORING SUBRECIPIENTS



Tammy Corn, Executive Director
Kokomo/Howard County
Governmental Coordinating Council
219 E. Sycamore Street
Kokomo, Indiana. 46901
765.456.2338

Federal Transit Administration
Title VI Program Civil Rights
200 West Adams Street
Suite 320
Chicago, IL 60606
Telephone: (312) 353-2789

Date: May 5, 2025

Re: Subrecipients

Civil Rights Office Representative,

This letter is to confirm; we the grantee under 5307 do not currently have any subrecipients that we pass any FTA funds through; however, we have in place monitoring procedures if in the future there is such a need.

Thank you for your consideration in this matter.

Sincerely,

A handwritten signature in blue ink that reads "Tammy Corn." The signature is fluid and cursive.

Tammy Corn

9. GENERAL REQUIREMENTS (CH.III)

EQUITY ANALYSIS



Tammy Corn, Executive Director
Kokomo/Howard County
Governmental Coordinating Council
209 South Union Street
Kokomo, Indiana. 46901
765.456.2338

Federal Transit Administration
Title VI Program Civil Rights
200 West Adams Street
Suite 320
Chicago, IL 60606
Telephone: (312) 353-4025

Re: Conduct Equity Analysis

Civil Rights Office Representative,

This letter is to confirm we the grantee under 5307 did not acquire any land for projects therefore no one was displaced from their residence and/or business.

Thank you for your consideration in this matter.

Sincerely,



Tammy Corn

10. GENERAL REQUIREMENTS (CH.III)

APPROVAL OF TITLE VI PROGRAM



May 7, 2025

Weston Reed, President and
Kokomo Board of Public Works and Safety Board Members
City of Kokomo
100 South Union Street
Kokomo, IN 46901

Board of Works Members:

This memo is to request the City of Kokomo's Board of Public Works and Safety adopt the City of Kokomo Transit's Title VI program for submission to the Federal Transit Administration (FTA) via the Kokomo Howard County Governmental Coordinating Council (KHCGCC).

Feel free to contact me if you have any questions or concerns.

Regards,

A handwritten signature in blue ink that reads "Tammy Corn".

Tammy Corn, Executive Director
KHCGCC

**BE IT KNOWN , THIS TITLE VI POLICY SHALL BE IN FULL FORCE AND EFFECT
IMMEDIATELY UPON ITS PASSAGE AND SIGNING.**

City of Kokomo, Indiana by and through
its Board of Public Works and Safety

Kokomo-Howard County Governmental
Coordinating Council Policy Board

By: _____
Weston Reed, President
Board of Public Works and Safety

By: _____
Chairman, KHCGCC Policy Board
Kokomo/Howard County Governmental
Coordinating Council

Date: _____

Date: _____

ATTEST:

By: _____
Sarah White, Clerk
Board of Public Works and Safety

By: _____
Greg Sheline, Secretary/Treasurer
KHCGCC Policy Board

Date: _____

Date: _____

Attachment #1

FEDERAL TRANSIT ADMINISTRATION CIVIL RIGHTS ASSURANCE

The City of Kokomo HEREBY CERTIFIES THAT, as a condition of receiving Federal assistance under the Federal Transit Act of 1964, as amended, it will ensure that:

1. No person on the basis of race, color, or national origin will be subjected to discrimination in the level and quality of transportation services and transit-related benefits.
2. The City of Kokomo will compile, maintain and submit in a timely manner Title VI information required by FTA Circular 4702.1 and in compliance with the Department of Transportation's Title VI regulation, 49 CFR Part 21.9.
3. The City of Kokomo will make it known to the public that those person or persons alleging discrimination on the basis of race, color, or national origin as it relates to the provision of transportation services and transit-related benefits may file a complaint with the Federal Transit Administration and/or the U.S. Department of Transportation.

The person or persons whose signature appears below are authorized to sign this assurance on behalf of the grant applicant or recipient.

Tammy Corn, Executive Director
Name and Title

March 20, 2025
Date


Signature

11. ADDITIONAL INFORMATION AS SPECIFIED IN CHAPTERS

2. REQUIREMENTS OF TRANSIT PROVIDERS (CH.IV)

SERVICE POLICIES



City of Kokomo

Standard U.S. DOT Title VI Assurances

The **City of Kokomo, Kokomo, Indiana** (hereinafter referred to as the "Recipient") HEREBY AGREES THAT as a condition to receiving any Federal financial assistance from the Department of Transportation it will comply with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C. 2000d-42 U.S.C. 2000d-4 (hereinafter referred to as the Act), and all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-Assisted Programs of the Department of Transportation-Effectuation of Title VI of the Civil Rights Act of 1964 (hereinafter referred to as the Regulations) and other pertinent directives, no person in the United States shall, on the grounds of race color, or national origin, be excluded from participation in, be denied the benefits of, or otherwise subjected to discrimination under any program or activity for which the Recipient received Federal financial assistance from the Department of Transportation, including the **Indiana Department of Transportation** and HEREBY GIVES ASSURANCE THAT it will promptly take any measures necessary to effectuate this agreement. This assurance is required by subsection 21.7(a)(1) of the Regulations, a copy of which is attached.

More specifically and without limiting the above general assurance, the Recipient hereby gives the following specific assurance with respect to its **Federal Aid Transportation Program**:

1. That the Recipient agrees that each "program" and each "facility as defined in subsections 21.23(e) and 21.23(b) of the Regulations, will be (with regard to a "program") conducted, or will be (with regard to a "facility") operated in compliance with all requirements imposed by, or pursuant to, the Regulations.
2. That the Recipient shall insert the following notification in all solicitations for bids for work or material subject to the Regulations and made in connection with all **Federal Aid Transportation Program** and, in adapted form in all proposals for negotiated agreements:

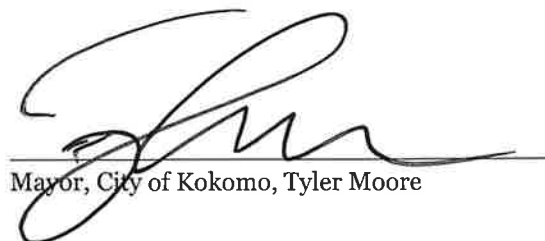
The **City of Kokomo, Kokomo, Indiana**, in accordance with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C. 2000d to 2000d-4 and Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office the Secretary, Part 21, Nondiscrimination in Federally assisted programs of the Department of Transportation issued pursuant to such Act, hereby notifies all bidders that it will affirmatively insure that in any contract entered into pursuant to this advertisement, minority business enterprises will be afforded full opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award.

3. That the Recipient shall insert the clauses of Appendix A of this assurance in every contract subject to the Act and the Regulations.

4. That the Recipient shall insert the clauses of Appendix B of this assurance, as a covenant running with the land, in any deed from the United States effecting a transfer of real property, structures, or improvements thereon, or interest therein.
5. That where the Recipient receives Federal financial assistance to construct a facility, or part of a facility, the assurance shall extend to the entire facility and facilities operated in connection therewith.
6. That where the Recipient receives Federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the assurance shall extend to rights to space on, over or under such property.
7. That the Recipient shall include the appropriate clauses set forth in Appendix C of this assurance, as a covenant running with the land, in any future deeds, leases permits, licenses, and similar agreements entered into by the Recipient with other parties: (a) for the subsequent transfer of real property acquired or improved under **Federal Aid Transportation Program** and (b) for the construction or use of or access to space on, over or under real property acquired, or improved under **Federal Aid Transportation Program**.
8. That this assurance obligates the Recipient for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of, personal property, or real property or interest therein or structures or improvements thereon, in which case the assurance obligates the Recipient or any transferee for the longer of the following periods: (a) the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or (b) the period during which the Recipient retains ownership or possession of the property.
9. The Recipient shall provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom he delegates specific authority to give reasonable guarantee that it, other recipients, sub-grantees, contractors, subcontractors, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Act, the Regulations and this assurance.
10. The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Act, the Regulations, and this assurance.

THIS ASSURANCE is given in consideration of and for the purpose of obtaining any and all Federal grants, loans, contracts, property, discounts or other Federal financial assistance extended after the date hereof to the Recipient Department of Transportation under the **Federal Aid Transportation Program** and is binding on it, other recipients, sub-grantees, contractors, subcontractors, transferees, successors in interest and other participants in the **Federal Aid Transportation Program**. The person or persons whose signatures appear below are authorized to sign this assurance on behalf of the Recipient.

Dated: April 29, 2025



Mayor, City of Kokomo, Tyler Moore

APPENDIX A

During the performance of this contract, the contractor, for itself, its assignees and successors in interest (hereinafter referred to as the “contractor”) agrees as follows:

- (1) **Compliance with Regulations:** The contractor shall comply with the Regulation relative to nondiscrimination in Federally assisted programs of the Department of Transportation (hereinafter, “DOT”) Title 49, Code of Federal Regulations, Part 21, as they may be amended from time to time, (hereinafter referred to as the Regulations), which are herein incorporated by reference and made a part of this contract.
- (2) **Nondiscrimination:** the Contractor, with regard to the work performed by it during the contract, shall not discriminate on the grounds of race, color, or national origin in the selection and retention of subcontractors, including procurements of materials and leases or equipment. The contractor shall not participate either directly or indirectly in the discrimination prohibited by section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.
- (3) **Solicitations for Subcontractors, Including Procurements of Materials and Equipment:** In all solicitations either by competitive bidding or negotiation made by the contractor for work to be performed under a subcontract, including procurements of materials or leases of equipment, each potential subcontractor or supplier shall be notified by the contractor of the contractor’s obligations under this contract and the Regulation relative to nondiscrimination on the grounds of race, color, or national origin.
- (4) **Information and Reports:** The contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the **City of Kokomo** or the *Indiana Department of Transportation (INDOT)* or the *Federal Highway Administration (FHWA)* to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish this information the contractor shall certify to the **City of Kokomo**, or the *Indiana Department of Transportation* or the *Federal Highway Administration* as appropriate and shall set forth what efforts it has made to obtain the information.
- (5) **Sanctions for Noncompliance:** In the event of the contractor’s noncompliance with the nondiscrimination provisions of this contract, the **City of Kokomo** shall impose such contract sanctions as it or *INDOT* or *FHWA* may determine to be appropriate, including, but not limited to:
 - (a) Withholding payments to the contractor under the contract until the contractor complies, and/or
 - (b) Cancellation, termination or suspension of the contract, in whole or in part
- (6) **Incorporation of Provisions:** The contractor shall include the provisions of paragraphs (1) through (6) in every subcontract, including procurement of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto.

The contractor shall take such action with respect to any subcontractor procurement as the **City of Kokomo** or *INDOT* or *FHWA* may direct as a means of enforcing such provisions including sanctions for noncompliance: Provided, however that, in the event a contractor becomes involved in, or is threatened with,

litigation with a subcontractor or supplier as a result of such direction, the contractor may request the **City of Kokomo** to enter into such litigation to protect the interests of the **City of Kokomo**, and, in addition, the contractor may request the United States to enter into such litigation to protect the interests of the United States.

APPENDIX B

A. The following clauses shall be included in any and all deeds effecting or recording the transfer of real property, structures or improvements thereon, or interest therein from the United States.

(GRANTING CLAUSE)

NOW, THEREFORE, the Department of Transportation, as authorized by law, and upon the condition that the **City of Kokomo** will accept Title to the lands and maintain the project constructed thereon, in accordance with Title 23, *United States Code of Federal Regulations* the Regulations for the Administration of *Federal Aid Transportation Program* and the policies and procedures prescribed by *INDOT* or *FHWA* and, also in accordance with and in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in federally assisted programs of the Department of Transportation (hereinafter referred to as the Regulations) pertaining to and effectuating the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252; 42 U.S.C. 2000d to 2000d-4), does hereby remise, release, quitclaim and convey unto the **City of Kokomo** all the right, Title and interest of the Department of Transportation in and to said lands described in Exhibit "A" attached hereto and made a part hereof.

(HABENDUM CLAUSE)

TO HAVE AND TO HOLD said lands and interests therein unto **City of Kokomo** and its successors forever, subject, however, to the covenants, conditions, restrictions and reservations herein contained as follows, which will remain in effect for the period during which the real property or structures are used for a purpose for which Federal financial assistance is extended or for another purpose involving the provision of similar services or benefits and shall be binding on the **City of Kokomo**, its successors, and assigns.

The **City of Kokomo**, in consideration of the conveyance of said lands and interests in lands, does hereby covenant and agree as a covenant running with the land for itself, its successors and assigns, that (1) no person shall on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination with regard to any facility located wholly or in part on over or under such lands hereby conveyed [,] (and) * (2) that the **City of Kokomo** shall use the lands and interests in lands and interests in lands so conveyed, in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in federally assisted programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations may be amended [,] and (3) that in the event of breach of any of the above-mentioned nondiscrimination conditions, the Department shall have a right to reenter said lands and facilities on said land, and the above described land and facilities shall thereon revert to and vest in and become the absolute property of the Department of Transportation and its assigns as such interest existed prior to this instruction.*

*Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to effectuate the purposes of Title VI of the Civil Rights Act of 1964.

APPENDIX C

The following clauses shall be included in all deeds, licenses, leases, permits, or similar instruments entered into by the **City of Kokomo** pursuant to the provisions of Assurance 6(a).

The (grantee, licensee, lessee, permittee, etc., as appropriate) for himself, his heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby represent, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree [in the case of deeds and leases add "as a covenant running with land"] that in the event facilities are constructed, maintained, or otherwise operated on the said property described in this (deed, license, lease, permit, etc.) for a purpose for which a Department of Transportation program or activity is extended or for another purpose involving the provision of similar services or benefits, the (grantee, licensee, lessee, permittee, etc.) shall maintain and operate such facilities and services in compliance with all other requirements imposed pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, office of the Secretary, Part 21, Nondiscrimination in Federally-assisted programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations may be amended.

[Include in licenses, leases, permits, etc.]*

That in the event of breach of any of the above nondiscrimination covenants, **City of Kokomo** shall have the right to terminate the [license, lease, permit, etc.] and to re-enter and repossess said land and the facilities thereon, and hold the same as if said [licenses, lease, permit, etc.] had never been made or issued.

[Include indeed.]*

That in the event of breach of any of the above nondiscrimination covenants, **City of Kokomo** shall have the right to reenter said lands and facilities thereon, and the above-described lands and facilities shall thereupon revert to and vest in and become the absolute property of **City of Kokomo** and its assigns.

The following shall be included in all deeds, licenses, leases, permits, or similar agreements entered into by **City of Kokomo** pursuant to the provisions of Assurance 6(b).

The (grantee, licensee, lessee, permittee, etc., as appropriate) for himself, his personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree (in the case of deeds, and leases add "as a covenant running with the land") that (1) no person on the ground of race, color, or national origin shall be excluded from participation in, denied the benefits of, or he otherwise subjected to discrimination in the use of said facilities, (2) that in the construction of any improvements on, over or under such land and the furnishing of services thereon, no person on the ground of, race, color, or national origin shall be excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination, (3) that the (grantee, licensee, lessee, permittee, etc.) shall use the premises in compliance with all other requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-assisted programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations may be amended.

[Include in licenses, leases, permits, etc.]*

*Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to effectuate the purposes of Title VI of the Civil Rights Act of 1964.

That in the event of breach of any of the above nondiscrimination covenants, ***City of Kokomo*** shall have the right to terminate the [license, lease, permit, etc.] had never been made or issued.

[Include in deeds]*

That in the event of breach of any of the above nondiscrimination covenants, ***City of Kokomo*** shall have the right to reenter said land and facilities there-on, and the above described lands and facilities shall thereupon revert to and vest in and become the absolute property of ***City of Kokomo*** and its assigns.

*Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to effectuate the purposes of Title VI of the Civil Rights Act of 1964.



City of Kokomo Transit System-wide Title VI Service Standards and Policies

October 21, 2014

Tammy Corn, Executive Director

Updated August 28, 2017

Updated April 7, 2021

Updated May 15, 2024

Mission: To provide coordinated, accessible, timely, and safe transportation by means of friendly, knowledgeable, professional staff enhancing the quality of life for our friends and neighbors.

Summary:

Federal Title VI requirements of the Civil Rights Act of 1964 were recently updated by the Federal Transit Administration (FTA) and now require transportation providers to approve standards and policies. Small transit agencies must define system-wide service standards. Pursuant to requirements set forth in The Federal Transit Administration's (FTA) Circular 4702.1B City-Line Transit (CLT) must establish and monitor its performance under quantitative Service Standards and qualitative Service Policies. These service standards contained herein are used to develop and maintain efficient and effective fixed-route transit service. In some cases, these standards differ from standards used by CLT for other purposes. The FTA requires all fixed-route transit providers of public transportation to develop quantitative standards for the following indicators. Individual public transportation providers set these standards; therefore, these standards will apply to each individual agency rather than across the entire transit industry:

Service Standards and Policies to fixed route service.

System-wide Service Standards

- a. Vehicle Load
- b. Vehicle Headways
- c. On-time Performance
- d. Service Availability
- e. System-wide Service Policies
- a. Vehicle Assignment
- b. Transit Amenities

Vehicle Inventory

The City-Line Trolley currently operates six (6) routes using 5 vehicles and an inventory of 6 low-floor buses, operating Mon-Fri 6:30a to 7pm.

System-wide Service Standards

Vehicle Load

Vehicle Load Factor is described as follows by FTA Circular 4702.1B:

Vehicle load can be expressed as the ratio of passengers to the total number of seats on a vehicle. For example, on a 40-seat bus, a vehicle load of 1.3 means all seats are filled and there are approximately 12 standees. A vehicle load standard is generally expressed in terms of peak and off-peak times.

City-Line calculates Vehicle Load Factor by dividing the average peak passenger load on each route by the fleet's average seating capacity. Vehicle Load Factor is monitored regularly and used to determine whether additional capacity needs to be added to specific trips or routes based on changing demand patterns.

Proposed Standard:

Vehicle Load Factor of 1.2 during peak and 1.00 during off-peak times.

BUSES	SEATED	STANDING	TOTAL	MAX LOAD FACTOR
32'	30	15	45	1.2
35'	32	15	47	1.3

Vehicle Headway

Vehicle headway is described as follows by FTA Circular 4702.1B:

Vehicle headway is the amount of time between two vehicles traveling in the same direction on a given line or combination of lines. A shorter headway corresponds to more frequent service. Vehicle headways are measured in minutes (e.g., every 15 minutes). Headways and frequency of service are general indications of the level of service provided along a route. Vehicle headway is one component of the amount of travel time expended by a passenger to reach his/her destination.

City-Line calculates headway by determining the average length of time between buses on each route. In the event a route regularly exceeds Vehicle Load Factor standards, City-Line will evaluate whether headways should be reduced within the confines of funding levels.

WEEKDAY SERVICE ONLY, URBAN FIXED ROUTE SYSTEM	*PEAK	*BASE
*TIMES EXPRESSED IN MINUTES	30	30
	60	60

On-Time Performance

On-time performance is described as follows by FTA Circular 4702.1B:

On-time performance is a measure of runs completed as scheduled. This criterion first must define what is considered to be "on time." For example, a transit provider may consider it acceptable if a vehicle completes a scheduled run between zero and five minutes late in comparison to the established schedule. On-time performance can be measured against route origins and destinations only, or against origins and destinations as well as specified time points along the route. Some transit providers set an on-time performance standard that prohibits vehicles from running early (i.e., ahead of schedule) while others allow vehicles to run early within a specified window of time (e.g., up to five minutes ahead of schedule). An acceptable level of performance must be defined (expressed as a percentage). The percentage of runs completed system-wide or on a particular route or line within the standard must be calculated and measured against the level of performance for the system. City-Line defines a bus as late if it departs the "time point" five or more minutes later than the published time. Buses are considered early if they depart from a published time point at any time prior to the scheduled departure.

Current Standard: Since our fixed route system is small by industry standards, on-time performance is exceptionally good. We offer back-up vehicles if the system falls outside the stated perimeter. City-Line has an adopted on-time performance goal of 92- 95 percent. On-time performance

Service Availability

Service availability/transit access is described as follows by FTA Circular 4702.1B: Service availability is a general measure of the distribution of routes within a transit provider's service area. For example, a transit provider might set a service standard to distribute routes such that a specified percentage of all residents in the service area are within a one-quarter mile walk of bus service or a one-half mile walk of rail service. A standard might also indicate the maximum distance between stops or stations. These measures related to coverage and stop/station distances might also vary by population density. City-Line will determine transit availability by mapping all active bus stops within the system and then calculating the population that resides within one-half mile radii of those stops. This information is then compared to the total service area population.

Proposed Standard:

City-Line has a goal of ensuring 60 percent of city residents live within one-half mile of a bus stop.

System-wide Service Policies

The FTA requires fixed-route transit providers to develop a policy for each of the following service indicators. The following policies differ from service standards in that they are not based on meeting a quantitative threshold, but rather qualitative evaluation results.

Vehicle Assignment

Vehicle assignment is described as follows by FTA Circular 4702.1B: Vehicle assignment refers to the process by which transit vehicles are placed into service in depots and on routes throughout the transit provider's system. Policies for vehicle assignment may be based on the age of the vehicle, where age would be a proxy for condition. For example, a transit provider could set a policy to assign vehicles to depots so that the age of the vehicles at each depot does not exceed the system-wide average. The policy could also be based on the type of vehicle. For example, a transit provider may set a policy to assign vehicles with more capacity to routes with higher ridership and/or during peak periods.

City-Line currently has two general types of buses in the fleet, all of which are maintained to the same strict standards:

2- 32-foot heavy-duty transit buses

4 - 35-foot heavy-duty transit buses

Proposed Policy:

All buses have the same level of amenities (i.e., air conditioning, wheelchair lifts, Wi-Fi), available to riders. Buses are not assigned to specific routes within City-Line service area based on vehicle age, but rather to serve specific routes that call for vehicles of differing lengths based street limitations. Given City-Line's strict standards with respect to maintenance, age does not serve as a viable proxy for diminished quality.

Transit Amenities

Transit amenities are described as follows by FTA Circular 4702.1B:

Transit amenities refer to items of comfort, convenience, and safety that are available to the general riding public. Fixed-route transit providers must set a policy to ensure equitable distribution of transit amenities across the system. Policies in this area address how these amenities are distributed within a transit system, and the manner of their distribution determines whether transit users have equal access to these amenities. This is not intended to impact funding decisions for transit amenities, rather, this applies after a transit provider has decided to fund an amenity.

City-Line Transit amenities are distributed on a system-wide basis. Transit amenities include vehicle Wi-Fi, HVAC, ADA compliant wheelchair lifts, 28 bus stop shelters and benches, a transit station with HVAC, TV, Wi-Fi, vending, and restrooms. There is security cameras equipped with audio on all vehicles as well as in the Transit Center. The location of transit amenities is determined by factors such as ridership, individual requests, and staff recommendations.

Transit Service Planning & Service and Fare Setting Policies

These policies are handled by the appropriate governing bodies for said services as noted below. This section of the policy is designed to inform and involve public transit riders, stakeholders, and the general public about proposed changes in transit service.

Fare Changes

Currently the City of Kokomo does not charge fares for the transit system. "If" any amount would be proposed the City of Kokomo will be seek public input and approval by the Board of Public Works and KHCGCC Policy Board to implement fares.

Major Service Reductions

Are defined as any reduction in service miles or hours exceeding twenty-five (25%) percent of the total service miles or hours provided.

Major Route Modifications

Are defined as any fixed-route transit service change that exceeds twenty-five (25%) of the round-trip mileage of a route. All Service and Route related modifications that fall under the twenty-five (25%) threshold are considered routine and minor and are not subject to these procedures. Public information and involvement programs for service changes would also fall under adopted ordinances by the City of Kokomo.

REQUIREMENTS OF MPO

(MPO IS OVERSIGHT FOR TRANSIT PROVIDER)



Tammy Corn, Executive Director
Kokomo/Howard County
Governmental Coordinating Council
219 E. Sycamore Street
Kokomo, Indiana. 46901
765.456.2338

Federal Transit Administration
Title VI Program Civil Rights
200 West Adams Street
Suite 320
Chicago, IL 60606
Telephone: (312) 353-4025

Re: Transit Provider

Civil Rights Office Representative,

This letter is to confirm that the MPO is not the Transit Provider/Fixed Route Provider as set out in Chapter IV.

Thank you for your consideration in this matter.

Sincerely,

A handwritten signature in blue ink that reads "Tammy Corn." The signature is fluid and cursive, with a period at the end.

Tammy Corn



Tammy Corn, Executive Director
Kokomo/Howard County
Governmental Coordinating Council
219 E. Sycamore St.
Kokomo, Indiana. 46901
765.456.2338

Federal Transit Administration
Title VI Program Civil Rights
200 West Adams Street
Suite 320
Chicago, IL 60606
Telephone: (312) 353-2789

Re: Vehicle assignment

Mr. Seeskin,

This letter is to outline how the distribution of transit amenities are/were determined. When the fixed route transit (City-Line Trolley) was first considered for the area (2008) several local human service agencies were consulted for feedback, several community surveys were distributed and then a transportation consultant (McDonald Transit) was hired to guide us through the process. In September 2010 we began service with 2 lines (4 routes). In July 2013 we expanded service; again, following the same steps as before as well as having numerous requests for service from citizens throughout our community, in April 2019 we expanded our Orange-Line to service not only the southwest area, but also our midtown area. We now offer 4-5 vehicles running 6 routes, operating Monday – Friday 6:30am to 7pm (orange line ends at 7pm). The vehicle headways for the fixed route system are measured in minutes (e.g. every 30-60 minutes), while the para-transit is a demand response system.

In 2023 we purchased two (2) 35' low-floor Hometown Trolley buses, completing the retirement of the three (3) original Specialty Buses, bringing our fleet to six (6) 35' buses. The city has a central maintenance facility that adheres to a strict preventative maintenance schedule exceeding FTA guidelines. Our amenities (transit station, bus shelters, stops, etc.) are maintained at the highest level and show no current signs of deterioration.

The fixed route system (City-Line Trolley) although small in comparison to some, generates a very large ridership for a community of just over 58,000 in population. Pre-Covid (2019) we had 356,576 passenger boarding's and transported 104,425 on our complimentary para-transit system (Spirit of Kokomo). Post-Covid we have continued to struggle to regain ridership but are beginning to see increases. In 2024 we had 266,348 fixed route passenger boardings and our para-transit system had 81,882.

Thank you for your consideration in this matter.

Sincerely,

A handwritten signature in blue ink that reads "Tammy Corn".

Tammy Corn

SERVICE POLICIES

The City of Kokomo offers a fixed-route system called the City-Line Trolley. Routes are designed to transfer at a central location (Transit Center). There are six (6) routes run with a maximum of 5 vehicles.

- Red-Line: one-hour, south-bound loop route - bottom of the hour (:30), beginning at 6:30am
- Blue-Line West: thirty-minute route, bottom of the hour (:30), beginning at 6:30am and
- Blue-Line East: thirty-minute route, top of the hour (:00)
- Green: thirty-minute route running Northeast, bottom of the hour (:30) beginning at 6:30am
- Yellow: thirty-minute route running Northwest, top of the hour (:00)
- Orange-Line: one-hour south-west (and midtown), top of the hour (:00), beginning at 7am, last route ends at 7pm

We run 30-minute headways on 4 lines: Blue-Line East, Blue-Line West, Yellow and Green. Sixty-minute (60min) headways on both the Red-Line and Orange-Line routes.

All vehicles are maintained by the City of Kokomo's Central Equipment. They are maintained to the highest standards and all are equipped with heat/air-conditioning, video/audio security system, as well as Wi-Fi for rider's convenience.

There are currently 254 bus stops with 28 covered shelters. All shelters have system maps, trash receptacles and are cleaned and maintained regularly (including steam sanitation two times per year).

The Spirit of Kokomo para-transit system operates a parallel transit system exceeding the area set forth by the FTA. We transport seniors as well as all ADA qualified disabled clients. There are 22-26 vehicles running daily on this system, all are equipped for wheelchair transport. We are currently scheduling upwards to 700 trips per day on this system.

The Spirit of Kokomo para-transit system is curb-to-curb or door-to-door and mirrors the hours of operation of the fixed-route system. This system is maintained at the same level as the fixed-route system.



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1. That the Recipient agrees that each "program" and each "facility as defined in subsections 21.23(e) and 21.23(b) of the Regulations, will be (with regard to a "program") conducted, or will be (with regard to a "facility") operated in compliance with all requirements imposed by, or pursuant to, the Regulations.
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4. That the Recipient shall insert the clauses of Appendix B of this assurance, as a covenant running with the land, in any deed from the United States effecting a transfer of real property, structures, or improvements thereon, or interest therein.

6. That where the Recipient receives Federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the assurance shall extend to rights to space on, over or under such property.
7. That the Recipient shall include the appropriate clauses set forth in Appendix C of this assurance, as a covenant running with the land, in any future deeds, leases permits, licenses, and similar agreements entered into by the Recipient with other parties: (a) for the subsequent transfer of real property acquired or improved under **Federal Aid Transportation Program** and (b) for the construction or use of or access to space on, over or under real property acquired, or improved under **Federal Aid Transportation Program**.
8. That this assurance obligates the Recipient for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of, personal property, or real property or interest therein or structures or improvements thereon, in which case the assurance obligates the Recipient or any transferee for the longer of the following periods: (a) the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or (b) the period during which the Recipient retains ownership or possession of the property.
9. The Recipient shall provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom he delegates specific authority to give reasonable guarantee that it, other recipients, sub-grantees, contractors, subcontractors, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Act, the Regulations and this assurance.
10. The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Act, the Regulations, and this assurance.

THIS ASSURANCE is given in consideration of and for the purpose of obtaining any and all Federal grants, loans, contracts, property, discounts or other Federal financial assistance extended after the date hereof to the Recipient Department of Transportation under the **Federal Aid Transportation Program** and is binding on it, other recipients, sub-grantees, contractors, subcontractors, transferees, successors in interest and other participants in the **Federal Aid Transportation Program**. The person or persons whose signatures appear below are authorized to sign this assurance on behalf of the Recipient.

Dated: April 29, 2025


Executive Director, KHC GCC, Tammy Corn

APPENDIX A

During the performance of this contract, the contractor, for itself, its assignees and successors in interest (hereinafter referred to as the "contractor") agrees as follows:

- (1) **Compliance with Regulations:** The contractor shall comply with the Regulation relative to nondiscrimination in Federally-assisted programs of the Department of Transportation (hereinafter, "DOT") Title 49, Code of Federal Regulations, Part 21, as they may be amended from time to time, (hereinafter referred to as the Regulations), which are herein incorporated by reference and made a part of this contract.
- (2) **Nondiscrimination:** The Contractor, with regard to the work performed by it during the contract, shall not discriminate on the grounds of race, color, or national origin in the selection and retention of subcontractors, including procurements of materials and leases or equipment. The contractor shall not participate either directly or indirectly in the discrimination prohibited by section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.
- (3) **Solicitations for Subcontractors, Including Procurements of Materials and Equipment:** In all solicitations either by competitive bidding or negotiation made by the contractor for work to be performed under a subcontract, including procurements of materials or leases of equipment, each potential subcontractor or supplier shall be notified by the contractor of the contractor's obligations under this contract and the Regulation relative to nondiscrimination on the grounds of race, color, or national origin.
- (4) **Information and Reports:** The contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the **Kokomo/Howard County Governmental Coordinating Council (KHCGCC)** or the *Indiana Department of Transportation (INDOT)* or the *Federal Highway Administration (FHWA)* to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish this information the contractor shall so certify to the **KHCGCC**, or the *Indiana Department of Transportation* or the *Federal Highway Administration* as appropriate, and shall set forth what efforts it has made to obtain the information.
- (5) **Sanctions for Noncompliance:** In the event of the contractor's noncompliance with the nondiscrimination provisions of this contract, the **Kokomo/Howard County Governmental Coordinating Council (KHCGCC)** shall impose such contract sanctions as it or *INDOT* or *FHWA* may determine to be appropriate, including, but not limited to:
 - (a) Withholding of payments to the contractor under the contract until the contractor complies, and/or
 - (b) Cancellation, termination or suspension of the contract, in whole or in part
- (6) **Incorporation of Provisions:** The contractor shall include the provisions of paragraphs (1) through (6) in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto.

The contractor shall take such action with respect to any subcontractor procurement as the **Kokomo/Howard County Governmental Coordinating Council (KHCGCC)** or *INDOT* or *FHWA* may direct as a means of enforcing such provisions including sanctions for noncompliance: Provided, however

that, in the event a contractor becomes involved in, or is threatened with, litigation with a subcontractor or supplier as a result of such direction, the contractor may request the **Kokomo/Howard County Governmental Coordinating Council (KHCGCC)** to enter into such litigation to protect the interests of the **City of Kokomo**, and, in addition, the contractor may request the United States to enter into such litigation to protect the interests of the United States.

APPENDIX B

A. The following clauses shall be included in any and all deeds effecting or recording the transfer of real property, structures or improvements thereon, or interest therein from the United States.

(GRANTING CLAUSE)

NOW, THEREFORE, the Department of Transportation, as authorized by law, and upon the condition that the **Kokomo/Howard County Governmental Coordinating Council (KHCGCC)** will accept Title to the lands and maintain the project constructed thereon, in accordance with *Title 23, United States Code of Federal Regulations* the Regulations for the Administration of *Federal Aid Transportation Program* and the policies and procedures prescribed by *INDOT or FHWA* and, also in accordance with and in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in federally assisted programs of the Department of Transportation (hereinafter referred to as the Regulations) pertaining to and effectuating the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252; 42 U.S.C. 2000d to 2000d-4), does hereby remise, release, quitclaim and convey unto the **Kokomo/Howard County Governmental Coordinating Council (KHCGCC)** all the right, Title and interest of the Department of Transportation in and to said lands described in Exhibit "A" attached hereto and made a part hereof.

(HABENDUM CLAUSE)

TO HAVE AND TO HOLD said lands and interests therein unto **Kokomo/Howard County Governmental Coordinating Council (KHCGCC)** and its successors forever, subject, however, to the covenants, conditions, restrictions and reservations herein contained as follows, which will remain in effect for the period during which the real property or structures are used for a purpose for which Federal financial assistance is extended or for another purpose involving the provision of similar services or benefits and shall be binding on the **KHCGCC**, its successors, and assigns.

The **KHCGCC**, in consideration of the conveyance of said lands and interests in lands, does hereby covenant and agree as a covenant running with the land for itself, its successors and assigns, that (1) no person shall on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination with regard to any facility located wholly or in part on over or under such lands hereby conveyed [,] (and) * (2) that the **Kokomo/Howard County Governmental Coordinating Council (KHCGCC)** shall use the lands and interests in lands and interests in lands so conveyed, in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in federally assisted programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations may be amended [,] and (3) that in the event of breach of any of the above-mentioned nondiscrimination conditions, the Department shall have a right to reenter said lands and facilities on said land, and the above described land and facilities shall thereon revert to and vest in and become the absolute property of the Department of Transportation and its assigns as such interest existed prior to this instruction.*

*Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to effectuate the purposes of Title VI of the Civil Rights Act of 1964.

APPENDIX C

The following clauses shall be included in all deeds, licenses, leases, permits, or similar instruments entered into by the **Kokomo/Howard County Governmental Coordinating Council (KHCGCC)** pursuant to the provisions of Assurance 6(a).

The (grantee, licensee, lessee, permittee, etc., as appropriate) for himself, his heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree [in the case of deeds and leases add “as a covenant running with land”] that in the event facilities are constructed, maintained, or otherwise operated on the said property described in this (deed, license, lease, permit, etc.) for a purpose for which a Department of Transportation program or activity is extended or for another purpose involving the provision of similar services or benefits, the (grantee, licensee, lessee, permittee, etc.) shall maintain and operate such facilities and services in compliance with all other requirements imposed pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, office of the Secretary, Part 21, Nondiscrimination in Federally-assisted programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations may be amended.

[Include in licenses, leases, permits, etc.] *

That in the event of breach of any of the above nondiscrimination covenants, **Kokomo/Howard County Governmental Coordinating Council (KHCGCC)** shall have the right to terminate the [license, lease, permit, etc.] and to re-enter and repossess said land and the facilities thereon, and hold the same as if said [licenses, lease, permit, etc.] had never been made or issued.

[Include in deed.] *

That in the event of breach of any of the above nondiscrimination covenants, **Kokomo/Howard County Governmental Coordinating Council (KHCGCC)** shall have the right to reenter said lands and facilities thereon, and the above described lands and facilities shall thereupon revert to and vest in and become the absolute property of **Kokomo/Howard County Governmental Coordinating Council (KHCGCC)** and its assigns.

The following shall be included in all deeds, licenses, leases, permits, or similar agreements entered into by **Kokomo/Howard County Governmental Coordinating Council (KHCGCC)** pursuant to the provisions of Assurance 6(b).

The (grantee, licensee, lessee, permittee, etc., as appropriate) for himself, his personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree (in the case of deeds, and leases add “as a covenant running with the land”) that (1) no person on the ground of race, color, or national origin shall be excluded from participation in, denied the benefits of, or he otherwise subjected to discrimination in the use of said facilities, (2) that in the construction of any improvements on, over or under such land and the furnishing of services thereon, no person on the ground of, race, color, or national origin shall be excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination, (3) that the (grantee, licensee, lessee, permittee, etc.) shall use the premises in compliance with all other requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-assisted programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations may be amended.

[Include in licenses, leases, permits, etc.] *

*Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to effectuate the purposes of Title VI of the Civil Rights Act of 1964.

That in the event of breach of any of the above nondiscrimination covenants, ***Kokomo/Howard County Governmental Coordinating Council (KHCGCC)*** shall have the right to terminate the [license, lease, permit, etc.] had never been made or issued.

[Include in deeds] *

That in the event of breach of any of the above nondiscrimination covenants, ***Kokomo/Howard County Governmental Coordinating Council (KHCGCC)*** shall have the right to reenter said land and facilities there-on, and the above described lands and facilities shall thereupon revert to and vest in and become the absolute property of ***Kokomo/Howard County Governmental Coordinating Council (KHCGCC)*** and its assigns.

*Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to effectuate the purposes of Title VI of the Civil Rights Act of 1964.



Tammy Corn, Executive Director
Kokomo/Howard County
Governmental Coordinating Council
219 East Sycamore St.
Kokomo, Indiana. 46901
765.456.2338

Federal Transit Administration
Title VI Program Civil Rights
200 West Adams Street
Suite 320
Chicago, IL 60606
Telephone: (312) 353-2789

Re: Statement of Policy and Public Notice

To Whom It May Concern:

This letter is to confirm we the grantee under 5307 have our Title VI Statement of Policy (Public Notice) posted on our website www.kokomompo.com, in our administrative offices, meeting areas, on our vehicles, in our lobby, in our policy and in our rider's guide.

Thank you for your consideration in this matter.

Sincerely,

A handwritten signature in blue ink that reads 'Tammy Corn.' The signature is fluid and cursive, with a period at the end.

Tammy Corn

DEMOGRAPHIC PROFILE

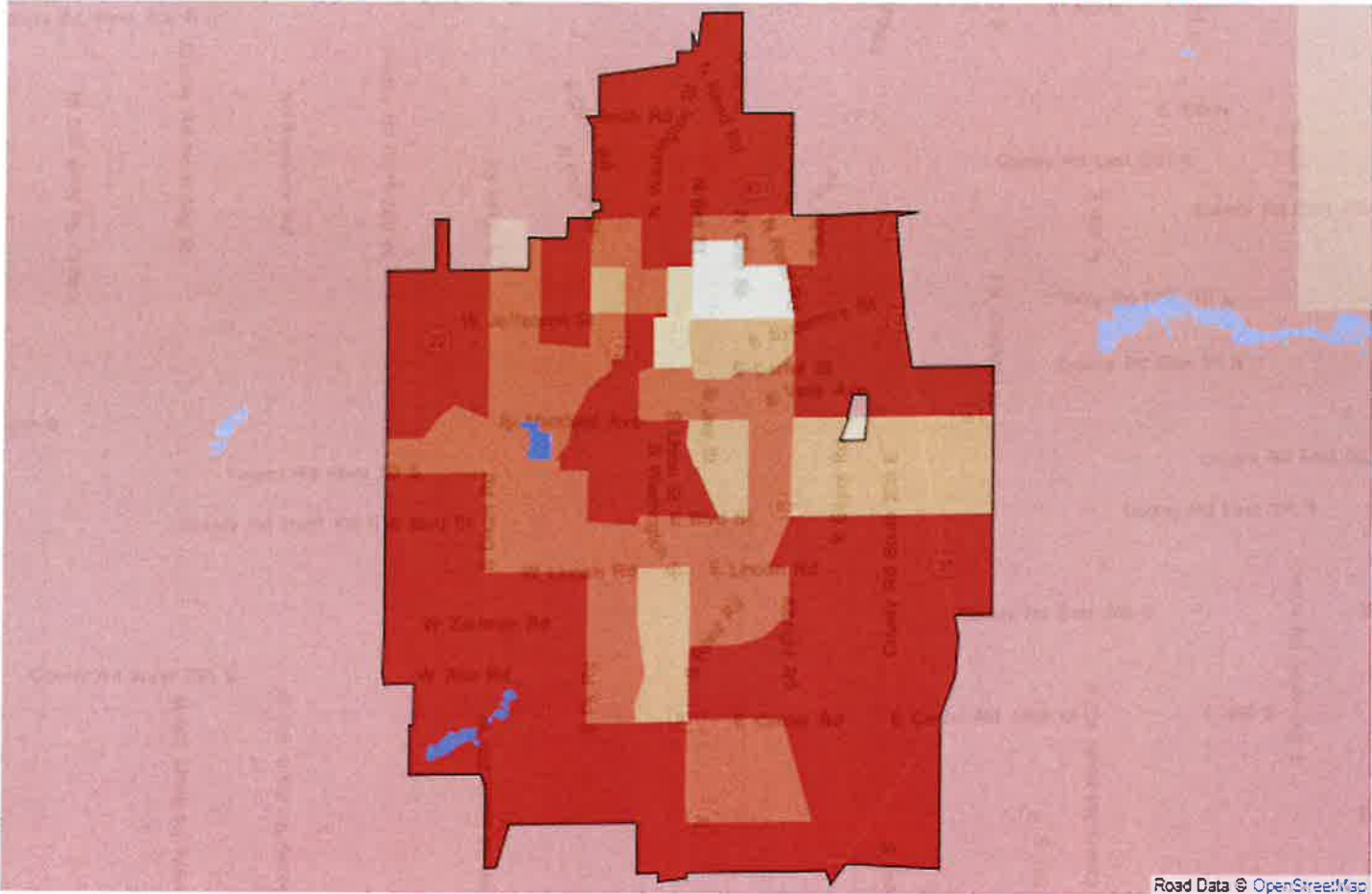
Map of Race and Ethnicity by Block Group in Kokomo

White Hispanic Black Asian Mixed Other

White Race and Ethnicity by Block Group

#13

Whites (non-Hispanic) as a percentage of the population (%):



<https://statisticalatlas.com/place/Indiana/Kokomo/Race-and-Ethnicity>

White

Hispanic

Black

Asian

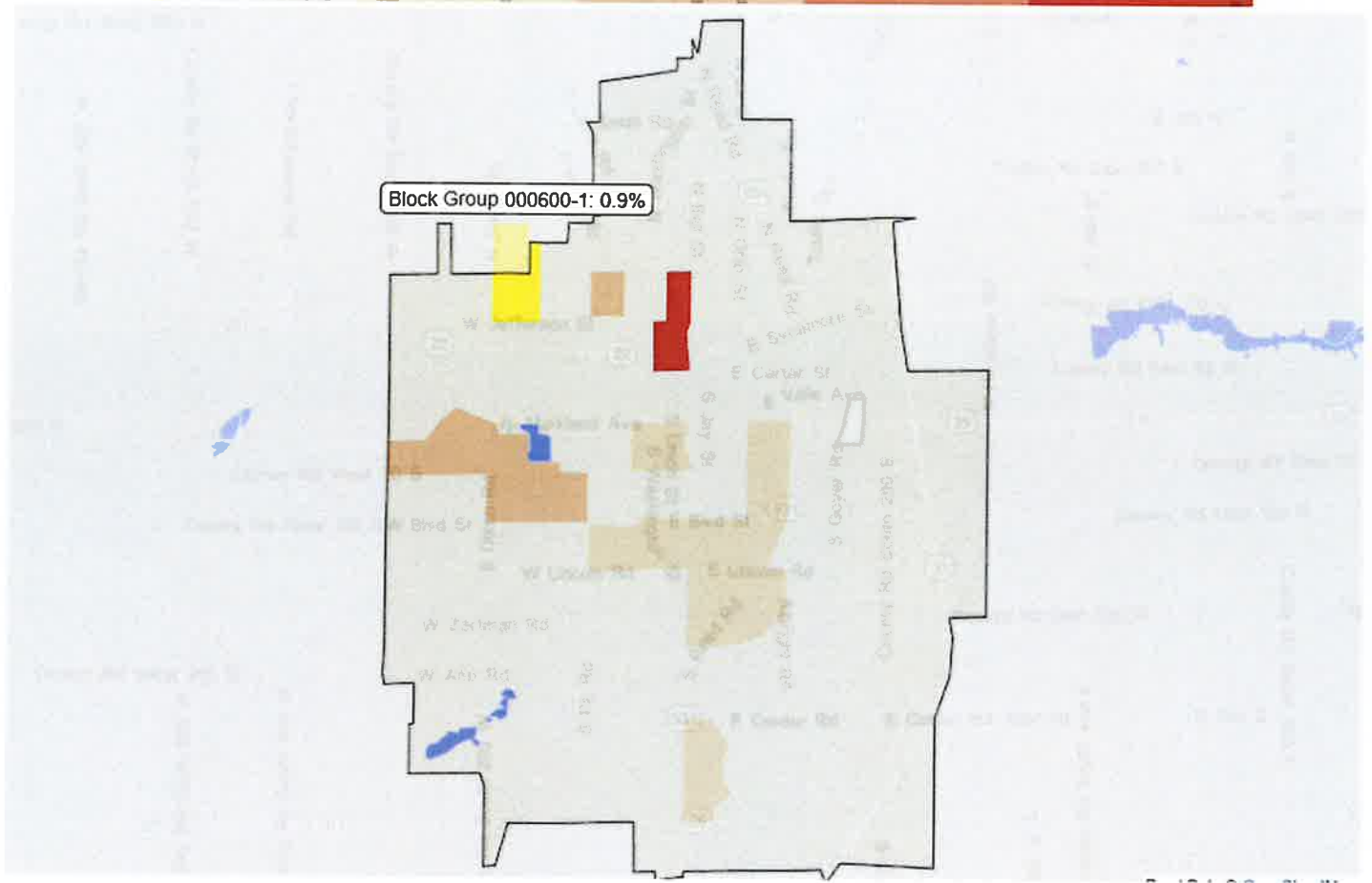
Mixed

Other

Hispanic Race and Ethnicity by Block Group

#14

Hispanics (excluding black and Asian Hispanics) as a percentage of the population (%):



<https://statisticalatlas.com/place/Indiana/Kokomo/Race-and-Ethnicity>

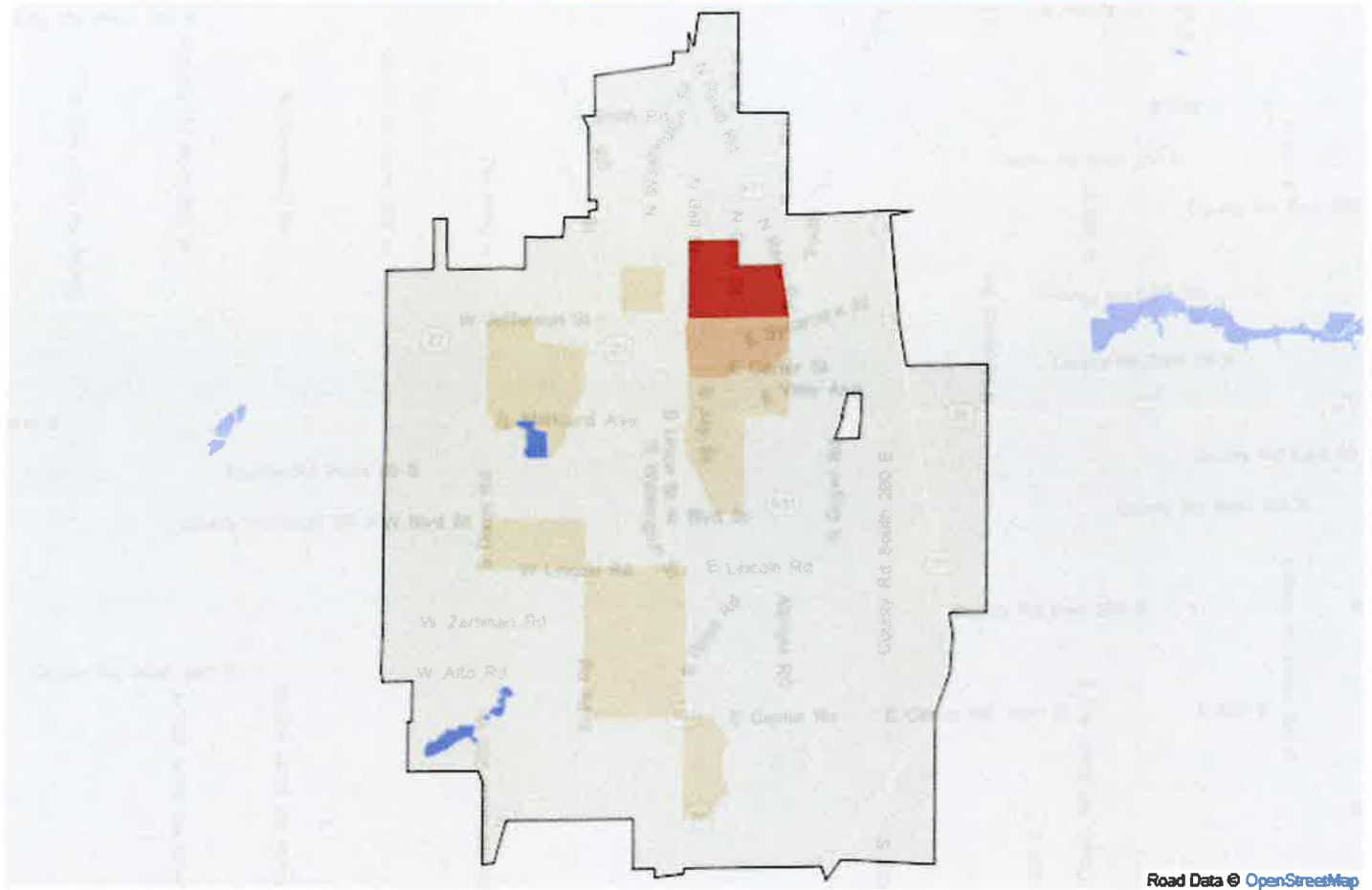
gie

White Hispanic **Black** Asian Mixed Other

Black Race and Ethnicity by Block Group

#15

Blacks as a percentage of the population (%):



<https://statisticalatlas.com/place/Indiana/Kokomo/Race-and-Ethnicity>

White Hispanic Black Asian Mixed Other

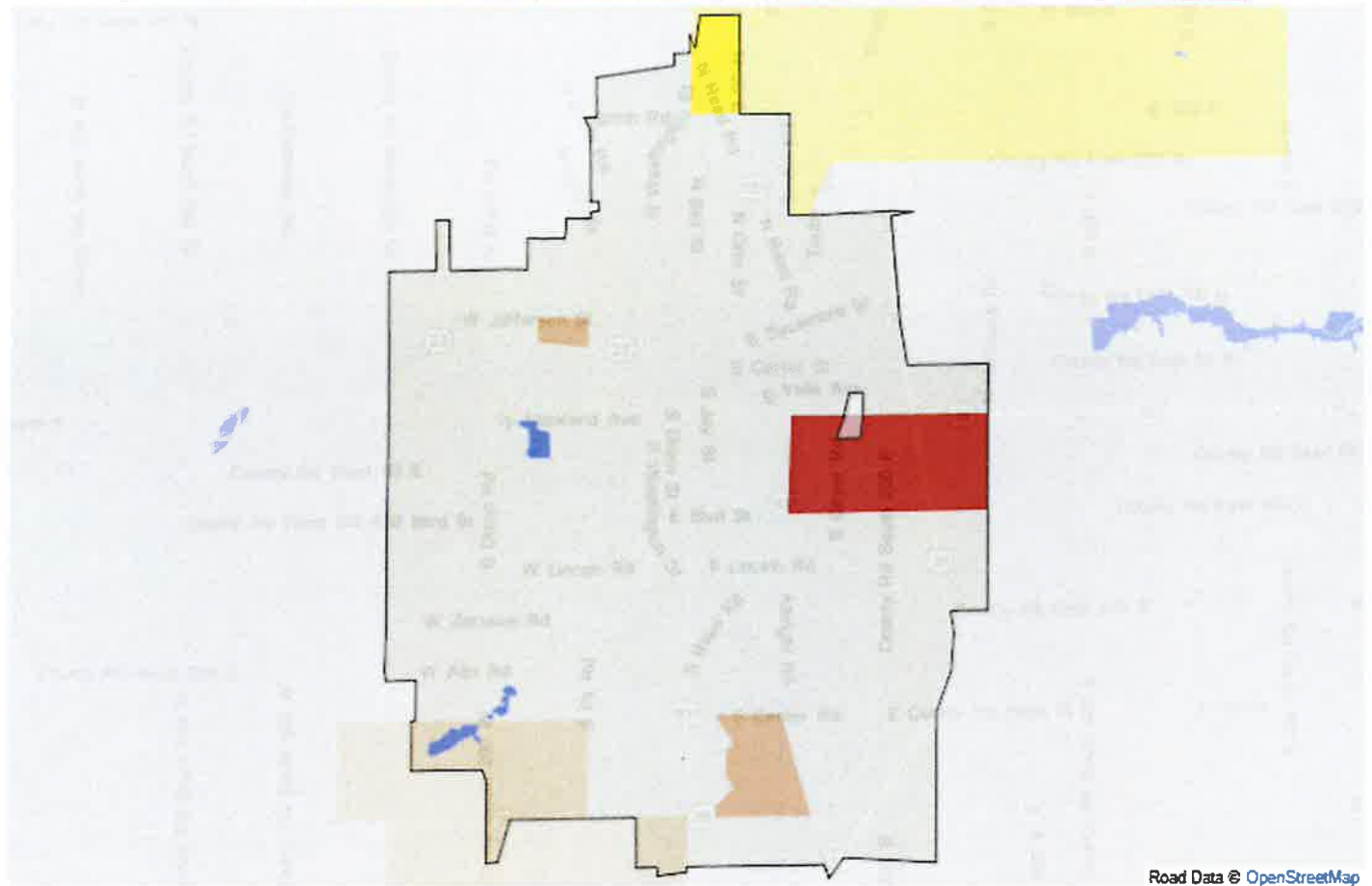
Asian Race and Ethnicity by Block Group

#16

Asians as a percentage of the population (%):

0.0% 3.2% 6.4% 9.5% 12.7% 15.9%

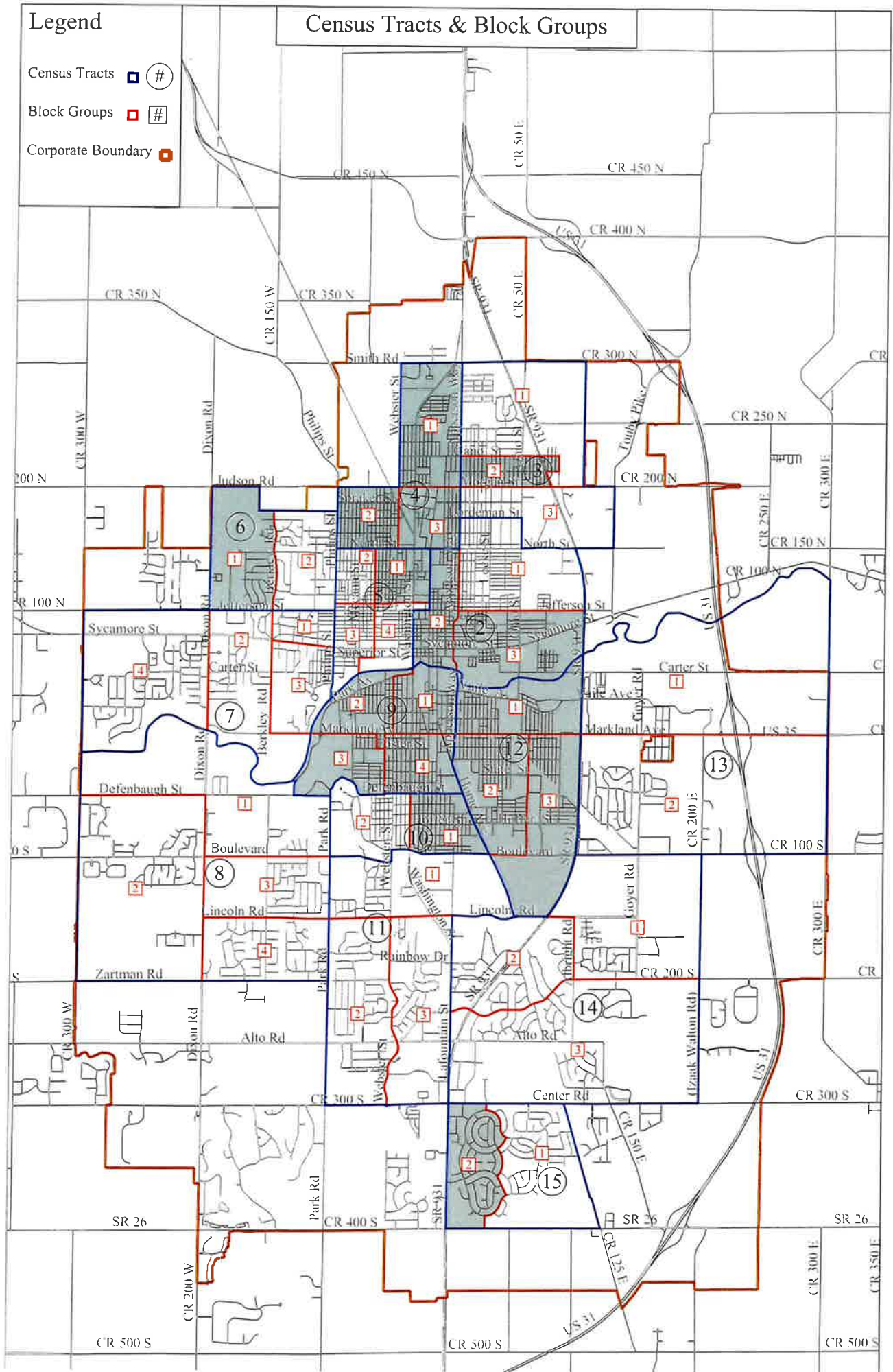
Block Group 010200-4: 0.00%



Road Data © OpenStreetMap

<https://statisticalatlas.com/place/Indiana/Kokomo/Race-and-Ethnicity>

Census Tracts & Block Groups

Corporate Boundary 

PEOPLE

Population

Population estimates, July 1, 2024, (V2024)

NA

Population estimates, July 1, 2023, (V2023)	59,890
Population estimates base, April 1, 2020, (V2024)	NA
Population estimates base, April 1, 2020, (V2023)	59,607
Population, percent change - April 1, 2020 (estimates base) to July 1, 2024, (V2024)	NA
Population, percent change - April 1, 2020 (estimates base) to July 1, 2023, (V2023)	0.5%
Population, Census, April 1, 2020	59,604
Population, Census, April 1, 2010	45,468

Age and Sex

Persons under 5 years, percent	6.0%
Persons under 18 years, percent	23.1%
Persons 65 years and over, percent	19.1%
Female persons, percent	53.0%

Race and Hispanic Origin

White alone, percent	81.5%
Black alone, percent (a) (a)	10.5%
American Indian and Alaska Native alone, percent (a) (a)	0.1%
Asian alone, percent (a) (a)	2.0%
Native Hawaiian and Other Pacific Islander alone, percent (a) (a)	0.0%
Two or More Races, percent	5.1%
Hispanic or Latino, percent (b) (b)	4.0%
White alone, not Hispanic or Latino, percent	79.4%

United States*
Census Bureau

Kokomo Indiana

Advanced Search

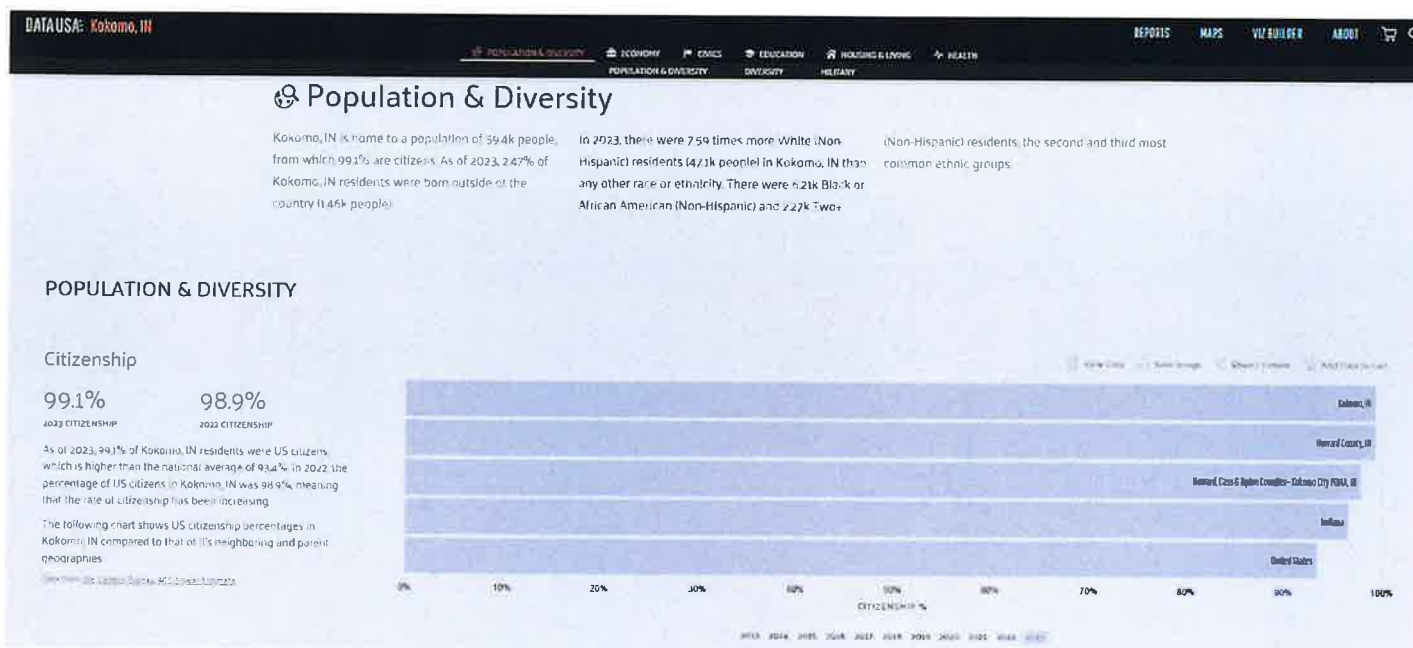
S1601 Language Spoken at Home		Kokomo city, Indiana		Percent		Percent of specified language speakers	
		Total	Estimate	Estimate	Estimate	Estimate	Estimate
Population 5 years and over		55,304	90	55,019	98.6%	785	1.4%
Speak only English		53,674	96.2%	53,000	96.3%	674	1.2%
Speak a language other than English		2,130	3.8%	1,345	63.1%	785	36.9%
SPEAK A LANGUAGE OTHER THAN ENGLISH							
Spanish		621	2.9%	409	65.9%	212	34.1%
5 to 17 years old		53	0.1%	32	60.4%	21	39.6%
18 to 64 years old		510	0.9%	319	62.5%	191	37.5%
65 years old and over		58	0.1%	58	100.0%	0	0.0%
Other Indo-European languages		465	0.8%	321	69.0%	144	31.0%
5 to 17 years old		142	0.3%	91	64.1%	51	35.9%
18 to 64 years old		233	0.4%	208	89.3%	25	10.7%
65 years old and over		90	0.2%	22	24.4%	68	75.6%
Asian and Pacific Island languages		932	1.7%	527	56.5%	405	43.5%
5 to 17 years old		150	0.3%	150	100.0%	0	0.0%
18 to 64 years old		776	1.4%	371	47.8%	405	52.2%
65 years old and over		6	0.0%	6	100.0%	0	0.0%
Other languages		112	0.2%	88	78.6%	24	21.4%
5 to 17 years old		12	0.0%	12	100.0%	0	0.0%
18 to 64 years old		100	0.2%	76	76.0%	24	24.0%
65 years old and over		0	0.0%	0	0	0	0
CITIZENS 18 YEARS AND OVER							
All citizens 18 years old and over		45,161	90	44,649	98.9%	512	1.1%
Speak only English		43,764	96.9%	43,000	98.3%	764	1.7%

Emergency Management of Howard County supplied the information from: Mitigation Policy Institute.

Indiana: Languages Spoken by Limited English Proficient (LEP) Individuals Statewide and by County: Number and Share of Total State/County Population

* LEP number estimates by language are displayed only if 500 persons or more. LEP percentage estimates by language are displayed only if 5 percent or more.

State	County	Total Population	Total LEP Population	Language 1 (name)	Language 1 (LEP number)	Language 1 (LEP % of total pop)	Language 2 (name)	Language 2 (LEP number)	Language 2 (LEP % of total pop)	Language 3 (name)	Language 3 (LEP number)	Language 3 (LEP % of total pop)	Language 4 (name)
Indiana	Hendricks County	133,200	2,400	Spanish	1,200								
Indiana	Henry County	46,500	300										
Indiana	Howard County	77,900	900	Spanish	500								
Indiana	Huntington County	34,800	200										
Indiana	Jackson County	39,300	1,400	Spanish	1,200								
Indiana	Jasper County	31,000	300										
Indiana	Jay County	19,900	200										



<https://datausa.io/profile/geo/kokomo-in#demographics>

The frequency with which LEP individuals come in contact with the program.

Due to the low volume of LEP persons identified in our area, and the fact to date we have never had a situation arise where someone has approached us for translation services; it is difficult to identify the frequency to which an individual “may” encounter a situation throughout the city/county programs. Although we fall well below the threshold that requires an active written LEP Plan, we take communication with our residents and visitors seriously. For that reason, we have procedures available in place if the situation arises to assure, we have an avenue to communicate with a person in need.

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

Whether it is current/ongoing Transportation (Transit, Road/Sidewalk construction, etc.), or long-term planning/goal setting for our area (MTP, TIP, Transit needs, Public Participation Plan, or the Coordinated Public-Transit Human Services Transportation Plan) related, we view all as equal when it comes to the importance of being able to communicate with the people we serve.

The resources available to the recipient and costs.

In addition to the list below, we have several community organizations that are available to partner with if the need arises.

- The local law enforcement agency- Kokomo Police Department, provides Spanish (our highest measurable non-English speaking language used) 24 hours per day/365 days per year, the Development Department (5 languages spoken), as well as several other city departments have Bi/Multi – Lingual staff members that can be called to assist. Cost \$0
- The United Way of Howard and Tipton County resource line. Cost \$0
- Kokomo Center School's - Area Career Center's Language Learners. Offering licensed language instructors. Cost \$0 (any cost would be absorbed by our department).
- Both local higher education facilities offer language assistance. Cost \$0 (any cost would be absorbed by our organization).
- We offer Google Translator on our website. Cost \$0
- Optimum Translator will be used in the event we ever need to translate documents. Cost \$0
- ISpeak Cards are onsite to identify what language is needed. Cost \$0

In conclusion:

In partnership with the City of Kokomo and the Howard County Government, the Kokomo/Howard County Governmental Coordinating Council will take reasonable steps to ensure that persons with LEP have meaningful access and an equal opportunity to participate in services, activities, programs and any other benefits offered. Including but not limited to:

- Effective Communication. Communication sufficient to provide the individual with limited English proficiency with substantially the same level of services received by individuals who are not limited in English proficiency.
- Interpretation. The act of listening to a communication in one language (source language) and orally converting it to another language (target language) while retaining the same meaning.
- Language Assistance Services. Oral and written language services needed to assist individuals with LEP to communicate effectively with staff and to provide individuals with LEP meaningful access and equal opportunity to participate fully in the services, activities, or other programs.
- Meaningful Access. Language assistance that results in accurate, timely, and effective communication at no cost to the individual with LEP. Meaningful access denotes access that is not significantly restricted, delayed or inferior as compared to programs or services provided to persons who are proficient in the English language.
- Primary Language. An individual's primary language is the language in which the individual most effectively communicates.
- Interpreter or Translator. Access to an interpreter (or translator) who can effectively communicate with the LEP individual.
- Translation. The replacement of written text from one language (source language) to an equivalent written text in another language (target language). I. Vital Documents. A document will be considered vital if it contains information that is critical for obtaining federal services and/or benefits, or is required by law.

Four Factor Analysis

Title VI of the Civil Rights Act of 1964 requires recipients of Federal financial assistance to take reasonable steps to make their programs, services, and activities accessible by eligible persons with limited English proficiency.

Smaller recipients with more limited budgets are typically not expected to provide the same level of language service as larger recipients with larger budgets.

<https://www.transportation.gov/civil-rights/civil-rights-awareness-enforcement/dots-lep-guidance>

The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.

Good Data Sources Include: Census, School District data, Health data, State, Community and Internal Agency data.



The Census Bureau and Courts.in.gov, Howard County Indiana has a total of 3.9% of households that speak "Language Other than English" and LEP population of 1.6% with a total.

Below is a table depicting the estimated Limited English Proficiency people for the area.

Kokomo, IN - All households 0.3%

Language Spoken	Estimated LED Persons	Estimated Percentage
Spanish	545	2.1%
Asian and Pacific Island	425	1.6%
Other Indo-European	312	1.2%
Other Language	20	0.1%

Howard County, IN – 2020 (2021 data is not populated) – All households 0.5%

Language Spoken	Estimated LED Persons	Estimated Percentage
Spanish	545	2.3%
Asian and Pacific Island	425	1.7%
Other Indo-European	312	1.0%
Other Language	20	0.2%

Below is an excerpt from the Indiana Department of Transportation: <https://www.in.gov/indot/accessibility-and-non-discrimination/nondiscrimination-at-indot/lep-persons-by-county/>

	Estimated Population	Estimated Population that Speaks English Less than Very Well	Percentage Who Speak English Less than Very Well
Howard County, Indiana	77,861	1403	1.80%



Tammy Corn, Executive Director
Kokomo/Howard County
Governmental Coordinating Council
219 E. Sycamore Street
Kokomo, Indiana. 46901
765.456.2338

Federal Transit Administration
Title VI Program Civil Rights
200 West Adams Street
Suite 320
Chicago, IL 60606
Telephone: (312) 353-2789

Date: May 5, 2025

Re: Summary of outreach

Civil Rights Office Representative,

This letter is to confirm we, the grantee under 5307 in conjunction with our Public Participation Plan adhere to all guidance for public outreach.

As a recipient of federal funds, steps are taken to ensure comments and concerns are obtained from our residents and especially our residents that are at a disadvantage. During the period from our last Title VI approval all projects that were federally funded we submitted public comments to stakeholders and the general public. The information is also dispersed via the following methods:

- Public meetings
- Request for public involvement posted on Facebook and websites
- Posted in the City of Kokomo Municipal building (both elevators)
- Canvassing for surveys
- Rider surveys

A hard copy of documents along with comment forms are offered at the following locations:

Public libraries
United Way
Center Township Trustee's office
Housing Authority
Rescue Mission
Transit office and lobby
Caver Center
Distributed to our CAC, TAC and Policy Board members
Urban Outreach
CAM (Coordinated Assisted Ministries)
Workforce Development

Sincerely,



Tammy Corn