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# TITLE VI PROGRAM

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Seneca County Agency Transportation



Approved:  
Reviewed:  
Revised:

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Adopted: 1/20/15

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## A. Title VI Assurances

**Seneca County Agency Transportation (SCAT)** agrees to comply with all provisions prohibiting discrimination on the basis of race, color, or national origin of Title VI of the Civil Rights Act of 1964, as amended, 42 U.S.C. 200d *et seq.*, and with U.S. DOT regulations, “Nondiscrimination in Federally-Assisted Programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act,” 49 CFR part 21.

**SCAT** assures that no person shall, as provided by Federal and State civil rights laws, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity. **SCAT** further ensures every effort will be made to ensure non-discrimination in all programs and activities, whether those programs and activities are federally funded or not.

**SCAT** meets the objectives of the FTA Master Agreement which governs all entities applying for FTA funding, including SCAT and its third-party contractors by promoting actions that:

- A. Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin.
- B. Identify and address, as appropriate, disproportionately high and adverse effects of programs and activities on minority populations and low-income populations.
- C. Promote the full and fair participation of all affected Title VI populations in transportation decision making.
- D. Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations.
- E. Ensure meaningful access to programs and activities by persons with Limited English Proficiency (LEP).

## B. Title VI Notice to the Public

### Notifying the Public of Rights under Title VI Seneca County Agency Transportation Board of Directors

- The Seneca County Agency Transportation (“the Board of Directors”) operates its program and services, including Access Scioto County Public Transit (SCAT), without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the Board of Directors
- For more information on the Board of Directors’ civil rights program, and the procedures to file a complaint, contact Mary E. Habig at 419-448-7344 (TTY 800-750-0750); email [scat@bright.net](mailto:scat@bright.net); or visit at the SCAT Office, located at 3446 S. Twp. Rd. , Tiffin, Ohio 44883.
- For transportation-related Title VI matters, a complainant may file a complaint directly with the Ohio Department of Transportation by filing a complaint with the Office of Equal Opportunity, Attention: Title VI Coordinator, 1980 West Broad Street, Columbus, OH 43223.
- For transportation-related Title VI matters, a complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE, Washington DC 20590.
- If information is needed in another language, contact 419-448-7344.
- Translation services are available to the public who do not speak English.
- Servicios de traducción están disponibles para el público que no hablan Inglés.

## C.Certification of Title VI Rights Notification Postings

### **CERTIFICATION OF TITLE VI RIGHTS NOTIFICATION POSTINGS FOR**

#### **Seneca County Agency Transportation**

Date: October 1, 2015

Seneca County Agency Transportation Title VI Notification of the Public's Rights is as follows:

### **Notifying the Public of Rights under Title VI**

#### **Seneca County Agency Transportation**

- The Seneca County Agency Transportation ("the Board of Directors") operates its program and services Transit, without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the Board of Directors
- For more information on the Board of Directors' civil rights program, and the procedures to file a complaint, contact Mary E. Habig, 419-448-7344 (TTY 800-750-0750); email [sct@bright.net](mailto:sct@bright.net); or visit the SCAT Office at 3446 S. Twp. Rd, Tiffin, Ohio 44883.
- For transportation-related Title VI matters, a complainant may file a complaint directly with the Ohio Department of Transportation by filing a complaint with the Office of Equal Opportunity, Attention: Title VI Coordinator, 1980 West Broad Street, Columbus, OH 43223.
- For transportation-related Title VI matters, a complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE, Washington DC 20590.
- If information is needed in another language, contract 419-448-7344.
- Translation services are available to the public who do not speak English.
- Servicios de traducción están disponibles para el público que no hablan Inglés.

In accordance with Title VI general reporting requirements I (the undersigned) certify that the Notification of the Public's Rights under Title VI is posted in the following Seneca County Transportation Locations:

- In the lobby of the SCAT office building
- On each SCAT County bus

In addition the following statement appears on the SCAT brochure:

Rural Transit Program grantees/contract service providers must adhere to Title VI of the Civil Rights Act of 1964 as amended, Section 601. This section states "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."

Certified by:

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Mary E. Habig, Executive Director

Seneca County Agency Transportation

## D. Title VI Complaint Procedures

1. Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the Seneca County Agency Transportation (hereinafter referred to as ("the Board of Director")), may file a Title VI complaint. All complaints are to be documented using the SCAT Title VI Complaint Form. The completed forms, including resolutions, are to be maintained in the SCAT Office located at: 3446 S. Twp. Rd. 151, Tiffin, Ohio 44883.
2. The Board of Directors will investigate all complaints received no more than 180-days after the alleged incident. The Board of Directors will process complaints that are complete. Once the complaint is received, the Board of Directors will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.
3. The option of informal mediation meeting(s) or telephone conversations between the affected parties and the Board of Directors may be utilized for resolution however the Board of Directors' Title VI Complaint Form must be completed documenting the complaint and the resolution resulting from the informal mediation.
4. Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the Board of Directors may file a Title VI complaint by completing and submitting the Board of Directors' Title VI Complaint Form to the following address:

Seneca County Agency Transportation Board of Directors  
3446 S. Twp. Rd 151  
Tiffin, Ohio 44883

5. The investigator will respond to all written complaints within forty eight (48) hours after receipt with follow up and resolution, if possible, to be provided within fifteen (15) working days.
6. The Board of Directors have 60 days to investigate the complaint. If more information is needed to resolve the complaint, the Board of Directors may contact the complainant. The complainant has 15 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 15 business days, the Board of Directors can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.
7. After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary



action, additional training of the staff member, or other action will occur. If the complainant is not satisfied with the investigator's decision, the decision may be appealed in writing to the Board of Directors within fifteen (15) working days after receipt of the letter of finding (LOF).

8. The appeal will be reviewed by the Board of Directors, who will provide a written response to the complainant and the Coordinator within thirty (30) days of receipt of the appeal.
9. For transportation-related Title VI matters, a complainant may also file a complaint directly with the Ohio Department of Transportation, Office of Equal Opportunity, Attention: Title VI Coordinator, 1980 West Broad Street, Columbus, OH 43223.

For transportation-related Title VI matters, a complainant may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590

## E. Title VI Complaint Form

<b>Seneca County Agency Transportation Title VI Complaint Form</b>			
<b>Section I:</b>			
Name:			
Address:			
Telephone (Home):		Telephone (Work):	
Accessible Format Requirements?	Large Print		Audio Tape
	TDD		Other
<b>Section II:</b>			
Are you filing this complain on your own behalf?		Yes* <input type="checkbox"/>	No <input type="checkbox"/>
*If you answered "Yes" to this question, go to Section III.			
If you answered "No" to this question, please supply the name and relationship of the person for whom you are complaining:		Person's Name:	Relationship:
Please explain why you have filed for a third party:			
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.		Yes <input type="checkbox"/>	No <input type="checkbox"/>
<b>Section III:</b>			
I believe the discrimination I experienced was based on (check all that apply):			
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin			
Date of Alleged Discrimination (MM/DD/YYYY): _____			
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name of contact information of the person(s) who discriminated against you (if known) as well as the names and contact information of witnesses. If more space is need, please use the back of this form.			
<b>Section IV:</b>			
Have you previously files a Title VI complaint with this agency?		Yes <input type="checkbox"/>	No <input type="checkbox"/>
<b>Section V:</b>			
Have you filed this complaint with any other Federal, State or local agency or with any Federal or State court?		Yes <input type="checkbox"/>	No <input type="checkbox"/>
If yes, check all that apply:			
<input type="checkbox"/> Federal Agency: _____		<input type="checkbox"/> State Court: _____	
<input type="checkbox"/> Federal Court: _____		<input type="checkbox"/> Local Agency: _____	
<input type="checkbox"/> State Agency: _____			
Please provide information about a contact person at the agency/court where the complaint was filed:			
Name:			
Title:			
Agency:			
Address:			
Telephone:			
<b>Section VI:</b>			
Name of agency complaint is against:			
Contact person:			
Title:			
Telephone number:			
You may attach any written material or other information that you think is relevant to your complaint.			
Signature and date required below:			

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Please submit this form in person at the address below or mail this form to:

Seneca County Board of Directors  
3446 S. Twp. 151  
Tiffin, Ohio 44883

## F. List of Title VI Investigations, Complaints, and Lawsuits

**Start Date:** January 1, 2015      **End Date:** Sept 15, 2015

The following table documents all Title VI investigations, complaints and/or lawsuits against Seneca County Agency Transportation alleging discrimination on the basis of race, color or national origin with respect to service or other transit benefits:

List of Transit-Related Title VI Investigations, Complaints, and Lawsuits				
	Date (Month, Day, Year)	Summary (include basis of complaint; race, color, or national origin)	Status	Action(s) Taken
Investigations	None			
1.				
2.				
Complaints	None			
1.				
2.				
Lawsuits	None			
1.				
2.				

**To date there have been no Title VI investigation, complaints or lawsuits against Seneca County Agency Transportation.**

# G.Seneca County Agency Transportation Public Participation Plan

## Introduction

Seneca County Agency Transportation (SCAT) operates a countywide, curb-to-curb, shared ride, demand response public transit service in Seneca County, Ohio Monday through Friday 5 a.m. to 6 p.m.; all users, including wheelchair users must schedule service 48 hours in advance. Door-to-door service is available upon request.

This Public Participation Plan (PPP) has been developed as guide for SCAT's public participation activities. It sets forth various means of providing information and receiving public input, promoting public participate in planning and how SCAT will undertake outreach methods to engage persons from diverse backgrounds, those with low-moderate incomes and populations with limited English proficiency (LEP) skills as well as a summary of outreach efforts made since the last Title VI Program submission.

## Purpose

The purpose of this PPP, in accordance with Federal Transit Administration (FTA) Circular 4702.1B *Title VI Requirements & Guidelines for FTA Recipients*, is to promote public participation by all citizens of Scioto County, Ohio, including those from diverse racial backgrounds, with disabilities, limited English proficiency (LEP) skills and persons with low and moderate income levels, are included in active public participation opportunities related to the planning and implementation of SCAT activities.

## Encouragement of Public Participation

SCAT recognizes the importance of stakeholders in its decision making processes. The public, our passengers, as well as other governmental agencies, social service agencies, community service and faith-based organizations is encouraged to participate in all aspects related to the planning and implementation of SCAT; including the development of grant applications, procedures, policies, strategic planning, public hearings, public meetings, and operational assessment processes.

SCAT especially encourages participation from its residents with low- and moderate-incomes, minority, Non-speaking and limited-English proficient speaking residents as well as persons with disabilities living in Senca County.

Sound policy and service delivery decisions need to reflect community sentiment and public opinion from a broad outreach. These public outreach strategies must be designed to offer our clients effective access to information and efficient and convenient methods of participating in SCAT's public process.

To further the goal of public participation in the SCAT decision making process a board representation of our stakeholders shall be represented on the SCAT Advisory Board.

## Public Comment

SCAT will provide the public with at least a 30-day period to review and comment on all grant applications, proposed service or fare changes and any other documents or plans requiring specified public review and comment periods. SCAT will give full consideration and response to the public's concerns, comments and recommendations. Where applicable, review will be advertised in the local newspaper, the *Advertiser Tribune* in accordance with ODOT mandates, prior to the first day of the review and comment period. All affected documents will also be made available in electronic (and other) formats to persons with disabilities, upon request. All documents will be considered public and available for public review, upon request, in the Executive Director office, located in at 3446 S. Twp. Rd. 151, Tiffin, Ohio 44883 during normal SCAT business hours.

## Public Hearings

Public hearings will be held to obtain the public's input and to respond to proposals and questions. At least one public hearing is held annually prior to the rural grant proposal being submitted to ODOT. This public hearing is to be held before the proposed application is published for comment.

All public hearings will be held in an accessible location (Normally the SCAT Office, Board of Directors Conference Room 3446 S. Twp. Rd, Tiffin, Ohio 44883). All public hearings will be advertised in the local newspaper with the largest circulation (The Advertiser Tribune) not less than 30 calendar days before the scheduled public hearing. The public notice will state the date, time and place of the public hearing. All public hearings will be held in an accessible location and centrally located in the community to provide easy access to all residents. All public hearings will begin and be completed within timeframes when SCAT is in operation, making the hearing more accessible to persons who might be potential or actual stakeholder.

While the population of Seneca County does not include a large number of Non-English speaking persons SCAT will make every effort to encourage participation at all public hearings by all Non-English speaking persons by providing interpretation and translation if requested at least 48-hours in advance. This and any other special accommodation requests will be noted in the public notice appearing in the local newspaper advertising that specific meeting. The cost accommodated any special requests will be paid for by SCAT using ODOT funds and will not be passed along to those persons being assisted.

## SCAT Meetings

All scheduled SCAT meetings, including the SCAT Advisory Board meetings, are open to the public and the public is encouraged to attend. Notices will be placed at least 7 calendar days in advance on the bulletin boards at the SCAT office building located at 3446 St. Twp. Rd. 151, Tiffin, Ohio 44883. An announcement will be submitted to the *Advertiser Tribune* for publication at least 7 calendar days prior to the meeting. Both the notices and announcements will state the date, time and place of the meeting.

Public hearings will be held in an accessible location (generally the SCAT Office, 3446 S. Twp. Rd. 151, Tiffin, Ohio 44883). Public hearings will also be held during SCAT operating hours in order to promote a greater likelihood of participation of SCAT stakeholders.

## Availability to the Public

All public documents related to SCAT will be available to the public upon request. This includes the availability of materials in alternative formats upon request. Requests must be made to the Executive Director located at the SCAT Office, 3446 S. Twp. Rd. 151, Tiffin, Ohio 44883, during normal SCAT business hours on Monday through Friday from 8:00 a.m. until 5:00 p.m. (except during holidays). Hard copies will be available for purchase at a minimal charge per-page rate.

## Access to Records

All public records, documents and reports pertaining to SCAT are kept in the offices of the Executive Director, located at the SCAT Office Building, 3446 S. Twp. Rd. 151, Tiffin, Ohio 44883 (Phone: 419-448-7344; Fax: 419-448-8484). Documents will be made available to the public upon request during regular business hours as stated above. Records will be retained in accordance with applicable Public Record Retention laws, but in no case for a period not less than three years. Hard copies will be available for purchase at a minimal charge per-page rate.

## Technical Assistance in Making Comments & Complaints

Technical assistance will be provided to anyone requesting such assistance in developing complaints or comments as an accommodation. For example, SCAT personnel can record audio versions of comments or complaints or transcribe them with final review and approval of the person making the comment and or complaint.

## Complaints

All complaints and comments received by SCAT including those dealing with matters related to Title VI are addressed in the SCAT Complaint Policy.

It is the goal of SCAT to resolve any complaint in a prompt and timely manner and at the lowest level of supervision. All employees receiving customer complaints should always be friendly, polite, and helpful and try their best to resolve the problem if they can.

All complaints received are to be documented on an SCAT Complaint Form. The Executive Director or will respond to all written complaints within 48-hours of receipt of the complaint and with a resolution, if possible, within 15-working days. The complaint process offers several levels of review and remedy including the Seneca County Board of Directors. The Ohio Dept. of Transportation and the Federal Transit Administration (FTA).

## Persons with Disabilities

All SCAT public hearings and community meetings will be held in accessible locations. Those persons needing special accommodations should contact SCAT at least 48-hours prior to the public hearing or community meeting. All SCAT public hearings and community meetings are held during SCAT operating hours in order to permit the use of SCAT's accessible vehicles for transportation to the public hearing or community meeting. Copies of all written materials presented will be made available in alternative forms upon request.

## Persons with Limited English Proficiency (LEP)

According to 2013 U.S. Census estimates and a survey of local area governmental and social service agencies and organizations likely to serve LEP persons there are no large Non-English speaking populations in Scioto County. The likelihood of encountering a LEP person is small however if such an encounter should take place SCAT will make every reasonable effort to provide the LEP person with interpretation and translation within 72-hours of the request. This service will be provided to the LEP person free of charge.

On an annual basis SCAT will conduct a LEP Four-Factor Analysis. The Executive Director will use the data collected from the annual analysis to update the SCAT LEP Plan. The updated SCAT LEP Plan will be presented by the Executive Director to the Board of Directors their review and approval.

## Access to Information

Various policies and procedures promoting greater public access to information have been adopted the Board of Directors and are included in the SCAT Policies & Procedures Manual. Included among the policies and procedures are those related to Americans with Disabilities Act (ADA) compliance, communication of changes, access to information and a procedure for implementing changes in the service provided to the public.

The public is encouraged to participate in the process of making service changes. SCAT encourages participation from all stakeholders including those with low- and moderate-level incomes, minorities, Non-English speaking persons as well as persons with disabilities. SCAT also encourages other governmental agencies, social service agencies, community service and faith-based organizations to participate in the process of making service changes.

## Seneca County Agency Transportation Board of Directors Meetings

The Seneca County Agency Transportation Board of Directors is the governing body for SCAT.

The Seneca County Agency Transportation Board of Directors meets the third Tuesday of every month at the Seneca County Agency Transportation Office, 3446 S. Twp. Rd. 151, Tiffin, Ohio 44883 @ 9:00 A.M. in the accessible Board of Directors Conference Room. Notice of these meetings is posted in the local paper.

All Seneca County Agency Transportation Board of Directors meeting are open to the public. The public is given the opportunity to ask questions and provide comment on all legislation (including that related to the implementation of the 5311 Rural Transportation Grant) prior to adoption.

## Summary of Outreach Efforts

SCAT's summary of outreach efforts made since the last Title VI Program submission includes:

- Publishing Title VI Notice to the Public (within public areas of the SCAT Office Building, on-board all SCAT buses
- Provided public notice of all public hearings and meetings related to SCAT as indicated within this plan;
- Updating the Complaint Procedures to include specific instruction on how to file a Title VI discrimination complaint;
- Modifying the Complaint form to include the ability to provide the public to make specific Title VI complaints;
- Conducted annual Limited English Proficiency Four-Factor Analysis;
- Developed and adopted an updated Limited English Proficiency Plan which aligns with the most recent Limited English Proficiency Four-Factor Analysis;
- Developed a Public Participation Plan for use for SCAT.



# H.Seneca County Agency Transportation Limited English Proficiency Plan

## Introduction

The purpose of this limited English proficiency plan is to clarify the responsibilities of recipients of federal financial assistance from the U.S. Department of Transportation (DOT) and assist them in fulfilling their responsibilities to limited English proficient (LEP) persons, pursuant to Title VI of the Civil Rights Act of 1964 and implementing regulations. It was prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., and its implementing regulations provide that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance, and;

## Executive Order 13166

Executive Order 13166 "Improving Access to Services for Persons with Limited English Proficiency," reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency that is subject to the requirements of Title VI to publish guidance for its respective recipients clarifying that obligation. Executive Order 13166 further directs that all such guidance documents be consistent with the compliance standards and framework detailed in the Department of Justice's (DOJ's) Policy Guidance entitled "Enforcement of Title VI of the Civil Rights Act of 1964--National Origin Discrimination Against Persons With Limited English Proficiency." (See 65 FR 50123, August 16, 2000 DOJ's General LEP Guidance). Different treatment based upon a person's inability to speak, read, write, or understand English may be a type of national origin discrimination. Executive Order 13166 applies to all federal agencies and all programs and operations of entities that receive funding from the federal government, including state agencies, local agencies such as Access Scioto County Public Transit (SCAT) and governments, private and non-profit entities, and sub recipients.

The DOT issued Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients" on October 1, 2012. The purpose of this Circular is to provide recipients of FTA financial assistance with guidance and instructions necessary to carry out DOT Title VI regulations (49 CFR part 21) and to integrate into their programs and activities considerations expressed in the DOT's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient ("LEP") Persons (70 FR 74087, December 14, 2005). This Circular reiterates the requirement to take responsible steps to ensure meaningful access to benefits, service and information for LEP persons and that FTA recipients and sub recipients develop a LEP plan.

## Plan Summary

SCAT has developed this Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to SCAT services as required by Executive Order 13166. A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English. This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training staff, how to notify LEP persons that assistance is available and information for future plan updates. In developing the plan while determining SCAT's extent of obligation to provide LEP services, SCAT conducted a U.S. Department of Transportation four factor LEP analysis which considers the following: 1) The number or proportion of LEP persons eligible in the SCAT service area who may be served or likely to encounter the SCAT program, activity, or service; 2) the frequency with which LEP individuals come in contact with SCAT services; 3) the nature and importance of the program, activity or service provided by SCAT to the LEP population; and 4) the resources available to SCAT and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

## Four Factor Analysis

### **1. The number or proportion of LEP persons eligible in the SCAT service area who may be served or likely to encounter the SCAT program, activity, or service.**

SCAT examined the US Census estimates from 2014 and using data from Census tracts in the SCAT service area was able to determine that approximately 2.7% or 1,503 people within SCAT's service area age 5 and older spoke a language other than English.

SCAT also conducted a survey of local area agencies and organizations thought likely to serve persons with LEP. The purpose of the survey was to help gather data to identify the number or proportion of persons with LEP in our community. The survey attempted to determine to what extent the agencies were serving persons with LEP including how many persons with LEP were being serving on an annual basis, what non-English languages the agencies or organizations were encountering and what was the dominate, if any, language encountered.

Twenty-five (25) area agencies and organizations were sent the SCAT LEP survey of which ten (10) or approximately forty (40%) percent responded. Eight (8) of the ten (10) responding agencies and organizations reported having at least one LEP encounter during the past year. The total number of LEP persons encountered by all the surveyed agencies or organizations during the past year was forty (40). One hundred (100) percent of the responding agencies and organizations reported that Spanish was the most encountered language. One (1) agency reported encountering deaf or persons using sign language. The results of the survey combined with the analysis of census appear to support the presumption that contact with persons with LEP is very limited in the SCAT service area and if contact is made it is more than likely to be with Spanish speaking persons.

### **2. The frequency with which LEP individuals come in contact with the SCAT program, activity, or service.**

SCAT assesses the frequency at which staff and drivers have or could possibly have contact with LEP persons. This includes documenting phone inquiries and surveying drivers and customer service personnel. In 2010, SCAT contracted with Avalon Professional Translation of Dallas, Texas to provide interpreter services. Avalon offers 24-hour, 7-day a week, 365-days per year telephone interpreting through their state of the art contact center in more than One hundred-forty (140) languages. Since the implementation of this service, SCAT has had no requests for interpreters and zero requests for translated SCAT documents. SCAT staff and drivers have had no contact with LEP individuals.

### **3. The nature and importance of the program, activity, or service provided by the SCAT to LEP community.**

There is no large geographic concentration of any one type of LEP individuals in the SCAT service area. The overwhelming majority of the population of the SCAT service area some 97.3%, speak English. Therefore, for the most part, LEP individuals do not use SCAT's services. However, on occasion, international students from Tiffin University and Heidelberg University do use SCAT's services. While none of these students have ever required language assistance and do speak English very well, SCAT's services are moderately important to these individuals in order to provide access to shopping and work activities. It should be noted that use of SCAT's service by these students is minimal.

### **4. The resources available to the SCAT and overall costs.**

SCAT assessed its available resources that could be used for providing LEP assistance. Currently SCAT's number one resource available for use if a person with LEP is encountered is the Avalon translation service. The cost of this service is based on per-use charge. SCAT also is taking inventory of available organizations that SCAT could partner with for outreach, translation efforts and what level of staff training is needed. After analyzing the four factors, the SCAT developed the plan outlined in the following section for assisting persons of limited English proficiency.

## Limited English Proficiency Plan Outline

### How to Identify an LEP Person who Needs Language Assistance

Below are tools to help identify persons who may need language assistance:

- Examine records requests for language assistance from past meetings and events to anticipate the possible need for assistance at upcoming meetings;
- When SCAT sponsored meetings are held, set up a sign-in sheet table, have a staff member greet and briefly speak to each attendee. To informally gauge the attendee's ability to speak and understand English, ask a question that requires a full sentence reply;
- Have the Census Bureau's "I Speak Cards" at the meet's sign-in sheet table. While staff may not be able to provide translation assistance at this meeting, the cards are an excellent tool to identify language needs for future meetings. Also, have the cards available at the SCAT Transit Office; and
- Survey drivers and other first line staff on an annual basis at the beginning of each fiscal year regarding their experience on having any direct or indirect contact with LEP individuals.

### Language Assistance Measures

SCAT has or will implement the following LEP procedures. The creation of these steps are based on the very low percentage of persons speaking other languages or not speaking English at least "well" and the lack of resources available in the SCAT service area:

- Census Bureau's "I Speak Cards" are to be located in the Transit Office waiting area at all times.
- When an interpreter is needed, in person or on the telephone, staff will utilize the Avalon Professional Translation Service.

### SCAT Staff Training

All SCAT staff will be provided with the LEP Plan and will be educated on procedures to follow. This information will also be part of the SCAT staff orientation process for new hires. Training topics are listed below:

- Understanding the Title VI policy and LEP responsibilities
- What language assistance services SCAT OFFERS?
- Use of LEP "I Speak Cards"
- How to use the Avalon translation services
- Documentation of language assistance requests
- How to handle a Title VI and/or LEP complaint

### Outreach Techniques

SCAT does not have a formal practice of outreach techniques due to the lack of LEP population and resources available in the service area. However, the following are a few options that the SCAT will incorporate when and/or if the need arises for LEP outreach:

- If staff knows that they will be presenting a topic that could be of potential importance to an LEP person or if staff will be hosting a meeting or a workshop in a geographic location with a known concentration of LEP persons, meeting

notices, fliers, advertisements, and agendas will be printed in an alternative language, based on known LEP population in the area.

- When running a general public meeting notice, staff will insert the clause, based on the LEP population and when relevant, that translates into “A (insert alternative Language) translator will be available”.
- Key print materials will be translated and made available at the SCAT Transit Office, on board vehicles and in communities when a specific and concentrated LEP population is identified.

### Monitoring and Updating the LEP Plan

This plan is designed to be flexible and is one that can be easily updated. At a minimum, the SCAT will follow the Title VI Program update schedule for the LEP Plan.

Each update should examine all plan components such as:

- How many LEP persons were encountered?
- Were their needs met?
- What is the current LEP population in the SCAT service area?
- Has there been a change in the types of languages where translation services are needed?
- Is there still a need for continued language assistance for previously identified SCAT program?
- Have SCAT’s available resources, such as technology, staff, and financial costs changed?
- Has SCAT fulfilled the goals of the LEP Plan? And,
- Were any complaints received?

As part of the monitoring and update plan, the SCAT will track the activity of usage of its services by LEP persons and requests for assistance from Customer Service and Operator staff, and record information from annual passenger surveys which will identify the language spoken by passengers and their need for assistance. The SCAT will also maintain communication with municipalities in its service area at a minimum on an annual basis to identify LEP individuals who may have moved into a part of SCAT’s service area and may require assistance. These municipalities will also be instructed to contact the SCAT with any requests that they may receive for language assistance.

### Dissemination of the SCAT Limited English Proficiency Plan

. SCAT’s Notice of Rights under Title VI to the public is available in the SCAT Transit Office and on all vehicles. Any person, including social service, non-profit, and law enforcement agencies, along with other community partners with internet access will be able to access the plan.

Copies of the LEP Plan will be provided upon request. LEP persons may obtain copies/translations of the plan upon request.

Any questions or comments regarding this plan should be directed to the SCAT Executive Director.

Transit Director  
Seneca County Agency Transportation  
3446 S. Twp. Rd. 151  
Tiffin, Ohio 44883  
Phone: 419-448-7344  
Email: [scat@bright.net](mailto:scat@bright.net)

## I. Non-Elected Committees & Councils Membership Table

Table Depicting Membership of Committees and Councils Broken Down by Race							
Body	White	African American	American Indian and Alaska Native	Asian	Native Hawaiian and Other Pacific Islander	Some Other Race	Two or More Races
Seneca County Population	94.6%	2.6%	0.3%	0.7%	0.0%	4.8%	1.8%
SCAT Advisory Board	99%	0%	0%	0%	0%	1%	0%

The members of the SCAT Board of Directors are nominated by the current SCAT Board of Directors and Executive Director and approved by the Board of Directors. The current membership of the SCAT Board of Directors includes people who use the transit service, the county, the elderly and disabled, members of the local business community, social service agencies. Representatives on the Board of Directors are chosen on a basis of their capacity and expertise to advise the Executive Director in the management of the transit system regardless of age, race, color, national origin, income or impairment.

When a vacancy occurs on the SCAT Board of Director the following procedure is used to fill the position:

1. **Open Call:** Advisory Board membership openings are to open to all applicants and are to be publicized in advance in order to give applicants a “reasonable opportunity” to apply. When publicizing any openings a statement will be made that all applicants will be accepted and considered for the position and treated equally without regard to age, race, color, national origin, income or impairment .
2. **Fair Judging:** All applicants will be considered by the existing members of the SCAT Board of Directors and will be judged on their merits with procedures designed to identify the best qualified. The evaluation of applicants will be in accord with their past experience, expertise and familiarity of the transit system and their ability to be a value as an advisory to the Executive Director.
3. **An Applicant is Chosen:** The applicant that is judged to be “most qualified” by the existing SCAT Board of Director members will be nominated by the Board of Directors and Executive Director. The Board of Directors who will make the final decision to approve or disapprove the applicant and appoint them to the SCAT Board of Directors.

(Procedure to fill a vacancy on the SCAT Board of Director’s Bylaws)

## J. Signatures

The Title VI Program for Seneca County Agency Transportation has been reviewed and approved by the Seneca County Agency Transportation Board of Directors.

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Michael Felter, President  
Seneca County Agency Transportation

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Date

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Robin Reaves, Secretary  
Seneca County Agency Transportation

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Date