

TITLE VI PROGRAM

Adopted: August 31, 2015

Updated July 11, 2022

Table of Contents

Title VI Notice to the Public	3
Title VI Complaint Procedures	4
Title VI Complaint Form	7
List of Transit-Related Title VI Investigations, complaints, and Lawsuits	10
Public Participation Plan	11
Limited English Proficiency Plan	17
A Table Depicting the Membership of Non-Elected Committees & Councils	25
Approval of the Title VI Program	28

Title VI Notice to the Public

Notifying the Public of Rights Under Title VI

Pickaway County Community Action

- Pickaway County Community Action operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Pickaway County Community Action.
- For more information on Pickaway County Community Action's civil rights program, and the procedures to file a complaint, contact 740-477-1655 ext 305, TTY 1-800-750-0750; email mcox@picca.info; or visit our administrative office at 469 East Ohio Street, Circleville, Ohio 43113. For more information, visit picca.info.
- 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 St., 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, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.
- If information is needed in another language, contact 740-474-8835.

List of locations where Title VI Notice to the Public is posted

- On PICKAWAY AREA RURAL TRANSIT website, www.picca.info
- PICKAWAY AREA RURAL TRANSIT Transportation Office, 469 East Ohio Street, Circleville, OH 43113.
- On all PICKAWAY AREA RURAL TRANSIT vehicles

Title VI Complaint Procedure

PICKAWAY AREA RURAL TRANSIT
Policy Manual
469 East Ohio Street, Circleville, Ohio 43113

Subject:	Title VI and General Complaint Procedures	Section: Customer Service
Effective Date	8/31/15	Replaces: N/A
Approved By:	Transportation Coordination Committee	
Approval Date:	8/31/15	
Updated Date:	7/13/16	

Directive:

To establish a method for passengers to communicate complaints; including all complaints filed under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990, for alleged discrimination in any program or administered by PICCA.

Procedure:

Pickaway County Community Action Org. operates its programs and services without regard to race, color and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Pickaway County Community Action Org.

Title VI: Complaint Process

As a recipient of federal financial assistance, Pickaway County Community Action Organization, Inc. has in place the following Title VI complaint procedure.

- 1. Submit complaint:** Any person who believes that he or she, or any specific class of persons, has been subjected to discrimination on the basis of race, color, or national origin by Pickaway County Community Action Organization, Inc. federally funded programs, as prohibited by Title VI of the Civil Rights Act of 1964, as amended, and related statutes, may file a written complaint. Such complaint must be filed within 180 calendar days after the date the person believes the discrimination occurred. PICKAWAY AREA RURAL TRANSIT will process complaints that are complete. To obtain a copy of Title VI/Nondiscrimination Complaint Form call the transportation manager at 740-474-8835.

Submit completed complaint forms to:

Serena Huddleson, Human Resources, Pickaway County Community Action Organization, Inc.

469 E. Ohio St. Circleville, OH. 43113

- 2. Review and Response:** Upon receipt of the complaint, PICKAWAY AREA RURAL TRANSIT 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. If our office has jurisdiction, PICKAWAY AREA RURAL TRANSIT shall appoint one or more staff review officers, as appropriate, to evaluate and investigate the complaint. PICKAWAY AREA RURAL TRANSIT has 30 days to investigate the complaint. If more information is needed to resolve the case, PICKAWAY AREA RURAL TRANSIT may contact the complainant. The complainant has 5 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 5 business days, the Agency can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue the case. Upon completion of the review, the staff review officer(s) shall make a recommendation regarding the merit of the complaint and whether remedial actions are available to provide redress. Additionally, the staff review officer(s) may recommend improvements to PICKAWAY AREA RURAL TRANSIT'S processes relative to Title VI and environmental justice, as appropriate.

After the investigator reviews the complaint, she/he will prepare 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.

The staff review officer(s) shall forward her/his letter to the Transportation Director, for concurrence. If PICKAWAY AREA RURAL TRANSIT concurs, the Transportation Director shall issue PICKAWAY AREA RURAL TRANSIT'S written response to the Complainant, which must be approved by the Executive Director. This response shall be issued no later than 30 calendar days after the date the complaint was received. If more time is required, the Transportation Director shall notify the complainant of the estimated time-frame for completing the review.

- 3. Appeal:** The Complainant may appeal PICKAWAY AREA RURAL TRANSIT'S response to the complaint by submitting a written appeal to the PICKAWAY AREA RURAL TRANSIT Employee Services Coordinator no later than 15 calendar days after receipt of the PICKAWAY AREA RURAL TRANSIT'S written response. A response to any appeals will be issued by the PICKAWAY AREA RURAL TRANSIT Executive Director within 15 days of receipt.

- 4. Submission of Complaint to the Ohio Department of Transportation:** The Complainant may submit a complaint directly to the Ohio Department of Transportation Office of Equal Opportunity; Mailstop 3270, 1980 West Broad Street, 3rd floor, Columbus, Ohio 43223.

- 5. Submission of Complaint to the Federal Transit Administration:** If the Complainant is dissatisfied with PICKAWAY AREA RURAL TRANSIT'S resolution of the Complaint, he or she

may also submit a complaint to The Federal Transit Administration Office of Civil Rights, Attention: Title VI Program Coordinator East Building 5th Floor-TCR, 1200 New Jersey Ave, SE, Washington DC, 20590. These procedures do not deny the right of the complainant to file formal complaints with other state or Federal agencies or to seek private counsel for complaints alleging discrimination. These procedures are part of an administrative process that does not provide for remedies that include punitive damages or compensatory remuneration for the complainant.

6. ATTENTION: ODOT and FTA are to be contacted *only* with Title VI concerns relevant to PICKAWAY AREA RURAL TRANSIT'S transportation programs.

For more information on PICKAWAY AREA RURAL TRANSIT'S civil rights program, and the procedures to file a complaint, please contact Linda Stanton at 740-477-1655 x310, or visit www.picca.info

This information is available in other languages upon request by contacting PICKAWAY AREA RURAL TRANSIT at (740)477-1655

Title VI Complaint Form

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

filed.
Name:
Title:
Agency:
Address:
Telephone:
Section VI
Name of agency complaint is against:
Contact person:
Title:
Telephone number:

You may attach any written materials or 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:

Pickaway County Community Action Title VI Coordinator
 469 East Ohio Street
 Circleville, OH 43113

List of Transit-related Title VI Investigations, Complaints, and Lawsuits

PICKAWAY AREA RURAL TRANSIT

List of Transit-related Title VI Investigation, Complaints, and Lawsuits

Period: August 31, 2015 – December 31, 2022

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations	NONE			
1.				
2.				
Lawsuits	NONE			
1.				
2.				
Complaints	NONE			
1.				
2.				

PUBLIC PARTICIPATION PLAN

For

PICKAWAY AREA RURAL TRANSIT



Adopted by Community Action Board of Directors
Resolution #: Title VI - 2016

INTRODUCTION

The PICKAWAY AREA RURAL TRANSIT is a demand-responsive, door-to-door public transportation system operating within the Pickaway County, Ohio. Passengers are instructed to schedule rides at least 24 hours in advance of when service is needed. Service is financed through contracts with local agencies, donations from the county residents, Community Development Block Grant dollars as well as from the state and federal funds provided through the Ohio Department of Transportation and Federal Transit Administration. Transit fare revenues also serve to sustain system operations.

This Plan sets forth various ways in which the public can inclusively participate in planning, provide feedback/commentary and how PICKAWAY AREA RURAL TRANSIT as an agency will undertake outreach methods to engage person 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

Pursuant to the revised Title VI, 4702.1B Circular, this Citizen Participation Plan is hereby adopted to ensure that the citizens of Pickaway County, Ohio, including person from diverse racial backgrounds, those with disabilities, limited English proficiency skills and persons with low and moderate income levels, are included in active public participation opportunities related to the planning and implementation of PICKAWAY AREA RURAL TRANSIT activities.

ENCOURAGEMENT OF CITIZEN PARTICIPATION

Citizens are encouraged to participate in all aspects related to the planning and implementation of the PICKAWAY AREA RURAL TRANSIT; including the development of grant applications, procedures, policies, strategic planning, public hearing, public meetings, and operational assessment processes.

PICKAWAY AREA RURAL TRANSIT especially encourages participation from its residents with low- and moderate- incomes, minority, non- and limited- English proficient speaking residents as well as persons with disabilities residing in Pickaway County.

PICKAWAY AREA RURAL TRANSIT also encourages local government, social service and community agencies, who often serve a myriad of populations, to participate in planning and implementation activities as well. In order to achieve this objective, PICKAWAY AREA RURAL TRANSIT has engaged representation from various agencies serving populations that are often low-moderate income levels, serve a diverse base of clientele or have special needs on PICKAWAY AREA RURAL TRANSIT'S Transportation Coordination Committee.

CITIZEN COMMENTARY

PICKAWAY AREA RURAL TRANSIT will provide citizens with reasonable opportunity (generally, at least 30 days is mandated) to publicly review and comment on grant applications and any other documents or plans requiring specified public review and comment periods. PICKAWAY AREA RURAL TRANSIT will give full consideration and response to citizens' concerns, comments, and recommendations. Where applicable, review will be advertised in the local newspaper, the *Circleville Herald*, 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 person with disabilities, upon request. All documents will be considered public and available for citizen review, upon request, Title VI Administrator, located at PICKAWAY AREA RURAL TRANSIT'S office on 469 East Ohio Street, Circleville, OH 43113 from 8:00 a.m. to 4:30 p.m.

PUBLIC HEARINGS

Public hearings will be held to obtain citizens' views and to respond to proposals and questions. Annually, at least one public hearing is held prior to the grant application being submitted to ODOT. Said hearing is to be held before the proposed application is published for comment.

All public hearings will be held in accessible locations (generally the Basement Meeting Room of the PICKAWAY AREA RURAL TRANSIT offices). All public hearings will be advertised in the local newspaper of circulation (*Circleville Herald*) not less than 30 calendar days before the scheduled public hearing. All advertisements will state the date, time and place of the public hearing. All public hearings will be held in locations providing complete handicap accessibility and in locations centrally located in the community to provide easy access to all residents. All public hearings will begin and be completed within timeframes when the local public transportation system (PICKAWAY AREA RURAL TRANSIT) is in operation, making the hearing more accessible to persons who might be potential or actual beneficiaries.

As already noted, PICKAWAY AREA RURAL TRANSIT does not have high concentrations of non-English speaking persons. PICKAWAY AREA RURAL TRANSIT, however, will make every effort to encourage participation at all public hearings by non-English speaking persons by providing interpretation and translation if requested in advance (as noted within the newspaper advertisement announcing that specific meeting). The cost of such services will be paid for by PICKAWAY AREA RURAL TRANSIT using ODOT funds and will not be passed along to those being assisted.

MEETINGS

Citizens are encouraged to attend any scheduled meetings (including Transportation Coordination Committee meetings and affiliated sub-committee meetings). Notices will be placed at least 7 calendar days in advance of said meetings on various bulletin boards throughout the PICKAWAY AREA RURAL

TRANSIT building located on 469 East Ohio Street, Circleville, OH 43113. A reminder will be posted in the *Circleville Herald* at least 7 calendar days prior to the meeting detailing the time, date, location, and purpose of the meeting.

Public hearings will be held in accessible location (generally the Basement Meeting Room of the PICKAWAY AREA RURAL TRANSIT offices). Public hearings will also be held during those times with PICKAWAY AREA RURAL TRANSIT services are still in operation, which provides a greater likelihood that participation is all inclusive.

AVAILABILITY TO THE PUBLIC

All public documents relating to the PICKAWAY AREA RURAL TRANSIT will be available to the public upon request. This includes the availability of materials in a format accessible to persons with disabilities upon request. Requests must be made to PICKAWAY AREA RURAL TRANSIT, 469 East Ohio Street, Circleville, Ohio 43113 during normal business hours Monday through Friday from 8:00 a.m. until 4:30 p.m. (except during holidays). Hard copies will be available for purchase at the current per-page rate as established by the Finance Department.

ACCESS TO RECORDS

All public records, documents and reports pertaining to PICKAWAY AREA RURAL TRANSIT are kept in the [Transportation Office, 469 East Ohio St. Circleville, OH 43113, 740-474-8835. 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 less than three years. Hard copies will be available for purchase at the current per-page rate as established by the Finance Department.

TECHNICAL ASSISTANCE IN MAKING COMMENTS/COMPLAINTS

Technical assistance will be provided to any persons requesting such assistance in developing complaints or comments as an accommodation. For example, PICKAWAY AREA RURAL TRANSIT personnel can record audio version of said comments or complaints or transcribe them with final review/approval of the person making the comment and/or complaint.

CITIZEN COMPLAINTS

PICKAWAY AREA RURAL TRANSIT has adopted and included in its PICKAWAY AREA RURAL TRANSIT Policies and Procedures manual a policy outlining the methods for members of the public to make complaints/comments, including those related to Title VI matters.

PICKAWAY AREA RURAL TRANSIT will provide a timely and substantial written response within 15 calendar days to any complaints received regarding the operation or implementation of PICKAWAY

AREA RURAL TRANSIT or any aspect related to it. Said policy containing provisions which allow for second review of the matter as well as an appeals process.

PERSONS WITH DISABILITIES

Public hearings and community meetings will be held in locations accessible to person with restricted mobility. All public hearings will be held at times when PICKAWAY AREA RURAL TRANSIT is in operation. PICKAWAY AREA RURAL TRANSIT is the local public transit system. Its vehicles are accessible to persons with disabilities. Upon request, copies of all written materials are available in alternative formats.

PERSON WITH LIMITED-ENGLISH PROFICIENCY

Based on figures from 2017 Census, PICKAWAY AREA RURAL TRANSIT does not have high concentrations of non-English speaking persons. PICKAWAY AREA RURAL TRANSIT will, however, make every effort to provide interpretation and translation if provided at least 72 hours advance notice. The cost of such services will be paid for by PICKAWAY AREA RURAL TRANSIT using ODOT grant funds and will not be passed along to those persons being assisted.

Annually, PICKAWAY AREA RURAL TRANSIT conducts Limited English Proficiency Four-Factor Analysis for PICKAWAY AREA RURAL TRANSIT. Utilizing the results of said analysis, PICKAWAY AREA RURAL TRANSIT Transportation Manager will draft a PICKAWAY AREA RURAL TRANSIT Limited English Proficiency Plan which will be presented to the members of the Transportation Coordination Committee (TCC) for review and approval. As noted in a prior section, notice of all TCC meetings is published in an effort to encourage public participation.

ACCESS TO INFORMATION

Various policies and procedures promoting greater citizen access to information have been adopted by Pickaway County Community Action Board of Directors and are included in the PICKAWAY AREA RURAL TRANSIT Policies & Procedures Manual. Included among said policies and procedures are those related to Americans with Disabilities Act compliance, communication of changes, access to information, and a procedure for implementing service changes.

Citizens are encouraged to participate in the process of making service changes. PICKAWAY AREA RURAL TRANSIT encourages participation from all residents including those with low-and moderate-level incomes, minorities, Non-English speaking persons as well as persons with disabilities residing in Pickaway County. PICKAWAY AREA RURAL TRANSIT also encourages local government, social service, business and community service agencies to participate in the process of making services changes.

PICKAWAY COUNTY COMMUNITY ACTION BOARD MEETINGS

Whereas the Transportation Coordination Committee (TCC) advise on matters related to the operation of PICKAWAY AREA RURAL TRANSIT and affiliated grand implementation, the Pickaway County Community Action Board is the governing body for the PICKAWAY AREA RURAL TRANSIT. In an effort to ensure information from TCC meetings is communicated adequately to the Pickaway County Community Action Board, at least one Pickaway County Community Action Board member will be assigned to serve as a member of the TCC annually.

Pickaway County Community Action Board generally meets on the last Monday of each month, excluding July and December, held at 469 East Ohio Street, Circleville, Ohio 43113, a fully-accessible location. Pickaway County Community Action Board Schedule is published and available online at picca.info.

SUMMARY OF OUTREACH EFFORTS

PICKAWAY AREA RURAL TRANSIT'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 PICKAWAY AREA RURAL TRANSIT'S office building, transit vehicles, and PICKAWAY AREA RURAL TRANSIT'S webpage);
- Provided public notice of all public hearings and meetings related to PICKAWAY AREA RURAL TRANSIT as indicated within this plan.
- Coordinated with representatives from Pickaway County Job & Family Services, Brown Memorial Home, Pickaway County Commissioners, Continuum of Care, Haven House, Pickaway Senior Center, Veteran's Service Office, Pickaway County DD as members of PICKAWAY AREA RURAL TRANSIT'S Transportation Coordination Committee in an effort to reach out to populations they serve, meet said populations needs and develop strategies to ensure maximum citizen participation.
- Amended current policy to enable LEP passengers to bring interpreter onboard PICKAWAY AREA RURAL TRANSIT free of cost.
- Updating the Complaint Procedures to include specific instruction on how to file a Title VI discrimination complaint:
- All public hearings and Transportation Coordination Committee meetings are/were held at PICKAWAY AREA RURAL TRANSIT'S office building, 469 East Ohio, Circleville, OH 43113 (a fully-accessible to persons with disabilities) is in operation.
- 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;
- Reviewed Public Participation Plan for use with PICKAWAY AREA RURAL TRANSIT.

PICKAWAY AREA RURAL TRANSIT



LIMITED ENGLISH PROFICIENCY PLAN

Originally Adopted: [8-31-2015]
Most Recent Revision: [7-11-2022]

SUBJECT:

Providing Language Assistance to Persons with Limited English Proficiency (LEP)

PURPOSE:

To provide guidance regarding the obligation to provide language assistance to persons with LEP

AUTHORITY:

Executive Order 13166, Title VI of the Civil Rights Act of 1964, and the Title VI regulations regarding language access.

SCOPE:

PICKAWAY AREA RURAL TRANSIT’S Transit Coordination Committee (TCC) has adopted this plan to provide meaningful access to the PICKAWAY AREA RURAL TRANSIT for persons with LEP wishing to participate in PICKAWAY AREA RURAL TRANSIT’S HUD-funded programming.

MEANINGFUL ACCESS—THE FOUR-FACTOR ANALYSIS:

PICKAWAY AREA RURAL TRANSIT will annually assess and update the LEP Four-Factor Analysis for use by the PICKAWAY AREA RURAL TRANSIT. At a minimum, the analysis will include the following four components:

- The number or proportion of persons with LEP eligible to be served or likely to be encountered by PICKAWAY AREA RURAL TRANSIT.
- The frequency with which persons with LEP come into contact with PICKAWAY AREA RURAL TRANSIT
- The nature and importance of PICKAWAY AREA RURAL TRANSIT to persons with LEP.
- PICKAWAY AREA RURAL TRANSIT resources and anticipated costs for providing meaningful access to persons with LEP.

Prior to the development of this LEP Plan, a Four-Factor Analysis was conducted by PICKAWAY AREA RURAL TRANSIT Title VI Administrator. Various forms of federal, state and local LEP-related data were analyzed. The Analysis provided PICKAWAY AREA RURAL TRANSIT with a more comprehensive understanding of how many people with LEP are likely to be encountered and how often those persons have accessed PICKAWAY AREA RURAL TRANSIT in the past year. The Analysis served as the basis for this LEP Plan.

THE IDENTIFICATION OF LEP INDIVIDUALS WHO NEED LANGUAGE ASSISTANCE:

1. **Census, state and local demographic data:** Data from the U.S. Census Bureau (2020 data available to date and recent estimates from the U.S. Census Bureau) were analyzed prior to the revision of PICKAWAY AREA RURAL TRANSIT’S LEP Plan. In reviewing the available federal data, no discernable concentrations of persons with limited English proficiency were noted in Circleville.

Pickaway County – Languages Spoke at Home

	Total Number	Percent of Population	Total Population of County
Speak Language other than English	1026	1.86%	55,058
Speak English Less than Very Well	418	0.76%	55,058
Spanish	676	1.23%	55,058
Other Indo-European Languages	245	0.44%	55,058
Asian and Pacific Island Languages	72	0.13%	55,058
Other languages	33	0.06%	55,058

2020 American Community Survey 5-Year Estimates

2. **Information gathered from community organizations that serve persons with LEP:** Local agencies were also surveyed by PICKAWAY AREA RURAL TRANSIT (December 2019). LEP contacts are relatively few and, most agencies do not track this data.

3. **Process to determine frequency in which future LEP encounters occur:** A process for determining the frequency with which persons with LEP come into contact with PICKAWAY AREA RURAL TRANSIT has been developed. Implementation of this process will ensure that annual assessment of the current LEP Plan is reflective of the community’s most-current needs. PICKAWAY AREA RURAL TRANSIT staff will verbally communicate any LEP encounters they might have with the General Manager (drivers) or Operator (call takers), as appropriate. Language identifying applications that are installed on the onboard tablets used by PICKAWAY AREA RURAL TRANSIT drivers for navigation will be used to assist in aiding LEP individuals. “I speak” cards will be available onboard all of the PICKAWAY AREA RURAL TRANSIT vehicles and available to PICKAWAY AREA RURAL TRANSIT staff at the PICKAWAY AREA RURAL TRANSIT office building as a means of identifying the languages encountered. LEP encounter reports should include the date of the encounter, the number of persons with LEP encountered, the languages spoken by the person(s), the types of assistance sought and the point of contact. It will be the responsibility of the Title VI Administrator to record/track these contacts and review them annually in the process of evaluating the current LEP Plan. Recording the same

information as noted above, PICKAWAY AREA RURAL TRANSIT staff will also document contacts with LEP persons and provide them to the Title VI Administrator, who will analyze them, annually, as the plan is reviewed.

4. Synopsis of How Many Persons Need Language Assistance: As noted above, no full-fledged LEP encounters have occurred to date. Federal, state and local data indicate that the actual number of persons with LEP who live in Circleville is quite limited—substantiating that the number of persons actually served is in alignment with the number within the community. The analysis of data also suggests that, even though LEP encounters are anticipated to be rare in the future, Spanish is the language most likely to be encountered in the event of such instances.

LANGUAGE ASSISTANCE MEASURES:

PICKAWAY AREA RURAL TRANSIT and PICCA currently both have staff that can provide some level of free interpretation or translation of printed materials for persons who speak Spanish and need language assistance. In the event this is not sufficient, attempts will be made to secure a volunteer who speaks Spanish. If there are no volunteers available, PICKAWAY AREA RURAL TRANSIT can secure reasonably-priced services (if needed) through local educators for the purpose of Spanish interpretation. Although actual delivery is not guaranteed for languages other than Spanish, PICKAWAY AREA RURAL TRANSIT will make reasonable efforts to arrange for free language assistance for any consumer—regardless of the language spoken.

1. Language assistance measures already implemented: To date, PICKAWAY AREA RURAL TRANSIT have not had any official requests for assistance with oral or written language interpretation/translation.

2. Procedures for obtaining oral/written language interpretation: The Four-Factor Analysis clearly indicates that Spanish is the language most likely to be encountered if language assistance is needed. PICKAWAY AREA RURAL TRANSIT currently has one staff person with a minimal degree of Spanish language proficiency. As a result, bilingual staff members will first attempt to assist those persons requesting or needing assistance. If this is not sufficient, a volunteer interpreter will be sought. Should none be available, Language Line Solutions will provide Spanish language interpretation at reasonable costs (Title VI Administrator must approve this expense in advance). For persons needing interpretation for a language other than Spanish, staff should seek a volunteer interpreter through Ohio Christian University. Staff persons have been made aware of this process for the purpose of knowing how to access language assistance in the future.

3. Instructions for staff on how to respond to callers with LEP: PICKAWAY AREA RURAL TRANSIT has at least one staff person with some degree of Spanish language proficiency. The other employees have been made aware of this, and know to utilize these persons' skills in the event language assistance is needed.

All new (unduplicated) LEP contacts must be documented for the next year's LEP Four-Factor Analysis. PICKAWAY AREA RURAL TRANSIT Transportation Manager (or designee) will provide new contact information (date of encounter, type of assistance requested and language spoken) to PICKAWAY AREA

RURAL TRANSIT Administrator as encounters take place. PICKAWAY AREA RURAL TRANSIT will also provide this information to the Title VI Administrator as encounters take place.

In the event **a language other than Spanish** is encountered, the Title VI Administrator must be notified so that a volunteer interpreter can be sought. PICKAWAY AREA RURAL TRANSIT Manager (or designee) will report all encounters immediately, along with:

- The language encountered; and
- The type of language assistance requested (e.g. written translation of documents).

Thereafter, the Title VI Administrator will make every reasonable effort to secure a volunteer interpreter working through Ohio Christian University. Language assistance for languages other than Spanish is not guaranteed. PICKAWAY AREA RURAL TRANSIT, however, will make every reasonable attempt to secure volunteer language assistance. If a volunteer interpreter is located, language assistance will be provided to the individual free of cost.

4. Instructions for staff on how to respond to written communication from a person with LEP:

When communications written in Spanish are received, the Title VI Administrator must be notified as soon as possible. Thereafter, the Title VI Administrator will utilize one of the bilingual staff persons to provide translation as well as the assistance necessary to respond to the patron in writing. It will be the Title VI Administrator's responsibility to record these encounters at the time they occur for inclusion in the coming years' Four-Factor Analysis. If necessary, translation services may be secured through a local provider.

In the event that correspondence is received in a language other than Spanish, the PICKAWAY AREA RURAL TRANSIT must be notified as soon as possible. Thereafter, the Title VI Administrator will attempt to locate a volunteer who can translate the correspondence and assist in providing a written response. It will be the Title VI Administrator's responsibility to record these encounters at the time they occur for inclusion in the coming years' Four-Factor Analysis.

5. Instructions for drivers and call takers on how to respond to persons with LEP:

The call takers are the public's first point of contact. It is not anticipated that the drivers will encounter requests for language assistance; nor is it believed that the drivers will encounter a person with LEP that the call takers have not already documented for the coming year's Four-Factor Analysis. Nevertheless, in the interest of ensuring that all LEP encounters are documented and all patrons are provided with meaningful access, "I speak" cards will be kept in the transit vehicles as well in addition to language identifying application on the tablets utilize whenever they operate a PICKAWAY AREA RURAL TRANSIT vehicle. Drivers who encounter persons with weak or no English speaking skills should utilize the "I speak" cards or language applications to identify what type of language assistance is needed.

If a driver encounters a person with LEP who needs language assistance, she/he should contact the Transportation Manager (or designee). In the event Spanish language assistance is needed, the Transportation Manager will relay the date of the encounter and type of assistance provided to the Title VI Administrator for inclusion in the next year's Four-Factor analysis.

In the event that a driver encounters a person needing language assistance for a language other than Spanish, the driver should contact the General Manager who will contact the Transportation Manager. The Transportation Manager will thereafter notify the Title VI Administrator, who will attempt to secure a volunteer who can provide the requested language assistance. Volunteer assistance for languages other than Spanish is not guaranteed, but in the event it is located, it will be provided to the person with LEP free of cost. The Title VI Administrator will be responsible for documenting the date of the encounter, the type of assistance sought and the language spoken. This data will be analyzed in the next year's Four-Factor Analysis.

Interpreters accompanying LEP passengers may ride PICKAWAY AREA RURAL TRANSIT free of cost; much like a personal care attendant does.

6. Instructions for PICKAWAY AREA RURAL TRANSIT staff on how to respond to persons with LEP: Staff that serve persons with weak English skills should first utilize the "I speak" cards or tablet applications provided to them to identify the type of language encountered.

Bilingual staff will be utilized to provide interpretation in the event, Spanish language assistance is sought, and the date of the encounter and the type of assistance must be provided in writing to the Title VI Administrator for inclusion in the next year's Four-Factor Analysis.

7. Competency of the Interpreter and/or Translator: In instances where Spanish language assistance is needed, PICKAWAY AREA RURAL TRANSIT staff with some competency will first be utilized. In the event these resources are not immediately available or cannot successfully interpret, the Title VI Administrator will utilize a volunteer from the Ohio Christian University.

In instances where assistance is needed for a language other than Spanish, a volunteer will be sought from the Ohio Christian University. PICKAWAY AREA RURAL TRANSIT reserves the right to have the interpreter/translator demonstrates her or his ability to communicate and/or translate information in both English and the other language. PICKAWAY AREA RURAL TRANSIT will provide direct assistance to the interpreter or translator so that person has insight regarding system operations, policies, activities, etc. PICKAWAY AREA RURAL TRANSIT will instruct the interpreter or translator that he or she should not deviate into a role as counselor, legal advisor or any other role aside from interpreting or translating. PICKAWAY AREA RURAL TRANSIT will ask the interpreter or translator to attest that he or she does not have a conflict of interest related to the matter at hand.

The person with LEP has the right to utilize informal interpreters, including those from outside resources, of their choice and at their own expense, in lieu of the free assistance offered by PICKAWAY AREA RURAL TRANSIT. "Informal interpreters" and "outside resources" are defined directly below:

- a. Informal Interpreters -- Informal interpreters may include family members, friends, legal guardians, service representatives or advocates of the LEP client.
- b. Outside Resources -- Qualified outside resources may include community volunteers, fellow passengers or university students.

If a timely request is made, qualified outside resources may be used for interpreting services at public or informal meetings or events.

PICKAWAY AREA RURAL TRANSIT maintains relationships with other organizations that assist specific cultural and ethnic groups living in Circleville. To help their clients obtain public transportation, PICKAWAY AREA RURAL TRANSIT organizations may provide qualified interpreters for LEP persons.

LEP PLAN APPROVAL:

1. The LEP Plan will be approved by PICKAWAY AREA RURAL TRANSIT’S TCC.
2. The LEP Plan shall be reviewed and updated no less than annually by PICKAWAY AREA RURAL TRANSIT TCC.
3. The approval LEP Plan will contain the approval date of the original plan as well as the date of the most recently-adopted version.

LEP PLAN DISTRIBUTION AND TRAINING:

1. Staff likely to come into contact with persons with LEP: The scenarios contained in the table below are not all inclusive. However, they are anticipated to be most representative of when likely LEP encounters might occur as well as the expected point of contact.

Staff Most Likely to Have an LEP Encounter

Staff	Anticipated Point of Contact
PICKAWAY AREA RURAL TRANSIT Call Taker/Dispatch	When a person calls to schedule a trip
PICKAWAY AREA RURAL TRANSIT Driver	During a trip (if the passenger has questions/concerns about system operations or the service provided)
PICKAWAY AREA RURAL TRANSIT Administration personnel	When a passenger seeks information about the transit system
PICKAWAY AREA RURAL TRANSIT Administration personnel	At the time an individual wishes to make a complaint
PICKAWAY AREA RURAL TRANSIT Administration personnel	When a person secures a transit ID card
PICKAWAY AREA RURAL TRANSIT Administration personnel	To arrange for language assistance at a public hearing or to provide public comment

2. LEP Training for Staff: The LEP plan will be:

- Distributed to PICKAWAY AREA RURAL TRANSIT staff and PICCA Administration staff.
- Available for public review (during normal business days/hours) at the Title VI Administration Office, 469 East Ohio Street, Circleville, Ohio 43113.
- Explained in orientation and training sessions for PICKAWAY AREA RURAL TRANSIT Title VI Administration staff
- Made available PICKAWAY AREA RURAL TRANSIT Administration staff as revisions/updates to the LEP Plan occur.

PROVIDING NOTICE TO LEP PERSONS:

Public hearing notices currently include the following statement. “Those individuals who are non-English speaking and require an interpreter should contact PICKAWAY AREA RURAL TRANSIT Administrative Secretary office at least 48 hours prior to the public hearing. Upon timely request, these services will be provided free of cost.” This form of notice will continue to be provided.

MONITORING:

PICKAWAY AREA RURAL TRANSIT Administrator will utilize the TCC to review the plan annually—sometime prior to the 5311 operating grant submission. The review will include:

1. An annual report indicating the number of clients or potential clients with LEP encountered during the one-year period. The report should include the number and types of requests received, the various languages encountered, costs, etc. This report may be made a part of the annual LEP Four-Factor Analysis and be in narrative form.
2. A yearly review of the Four-Factor Analysis to ensure that the data, frequency with which persons with LEP come into contact with the programs, nature of any encounters and resources/costs are still accurately reflected/projected for the coming year.
3. PICKAWAY AREA RURAL TRANSIT will consultations with other entities serving the public and at-risk persons, no less than every five years. Consultations will be conducted with community organizations representing LEP persons as well as the staff responsible for providing language assistance.
4. PICKAWAY AREA RURAL TRANSIT will consider making changes to the LEP Plan based upon the feedback received through TCC and public input as well as from information learned through consultations. Associated costs and resources available to implement changes will be taken into consideration. Depending upon the evaluation, PICKAWAY AREA RURAL TRANSIT may choose to expand the language measures that are particularly effective or modify or eliminate those which have not been effective

Table Depicting Minority Representation on Committees and Councils Selected by the Subrecipient

Table Depicting Minority Representation on Committees and Councils Selected by the Subrecipient

Body	White	Black or African American	American Indian or Alaska Native	Asian	Native Hawaiian or Other Pacific Islander	Two or More Races	Hispanic or Latino
Population*	93.3%	4%	0.3%	0.6%	< 0.5%	1.8%	1.7%
Transportation Coordination Committee	100%	0%	0%	0%	0%	0%	0%
Board Members	100%	0%	0%	0%	0%	0%	0%

Source: 2021 census.gov Facts

Efforts made to encourage the participation of minorities on such committees are listed in the Public Participation Plan for PICKAWAY AREA RURAL TRANSIT which is also posted on PICKAWAY AREA RURAL TRANSIT'S web page www.picca.info .

Citizens are encouraged to participate in all aspects related to the planning and implementation of PICKAWAY AREA RURAL TRANSIT; including the development of grant applications, procedures, policies, strategic planning, public hearings, public meetings, and operational assessment processes.

PICKAWAY AREA RURAL TRANSIT especially encourages participation from its residents with low- and moderate-incomes, minority, non- and limited-English proficient speaking residents as well as persons with disabilities residing in Circleville.

PICKAWAY AREA RURAL TRANSIT also encourages local government, social service and community agencies, who often serve a myriad of populations, to participate in planning and implementation activities as well. In order to achieve this objective, PICKAWAY AREA RURAL TRANSIT has engaged representation from various agencies serving populations that are often of low-moderate income levels, serve a diverse base of clientele or have special needs on PICKAWAY AREA RURAL TRANSIT'S Transportation Coordination Committee

Approval of the Title VI Program

Acknowledgement

TITLE VI PROGRAM

PICKAWAY AREA RURAL TRANSIT (operating PICCA Transit) Title VI Program, updated 7/11/2022, provides PICKAWAY AREA RURAL TRANSIT with the requirements and guidelines necessary to carry out U.S. Department of Transportation Title VI regulations (49 CFR part 21) and to integrate into PICKAWAY AREA RURAL TRANSIT'S programs and activities considerations expressed in the Division's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient ("LEP") Persons.

This program has been approved by the following official responsible for policy decisions for PICKAWAY AREA RURAL TRANSIT:

Understood and agreed:

Franklin Christman, Pickaway County Community Action Board President

Date