



Title VI Program

Most recent update: October 24, 2012

September 1, 2015

LANCASTER PUBLIC TRANSIT SYSTEM
LIMITED ENGLISH PROFICIENCY PLAN
Four-Factor Analysis 2012

Limited English Proficiency (LEP) is a term used to describe individuals who are not proficient in the English language.

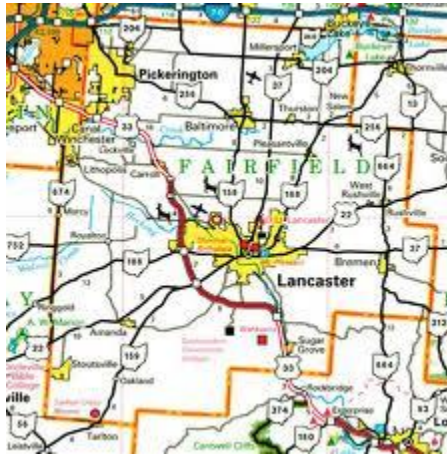
Federal law: Title VI of the Civil Rights Act of 1964 - National Origin Discrimination Against Persons with Limited English Proficiency and (Presidential) Executive Order 13166 - requires Federal departments and agencies to develop and make available guidance on how recipients of Federal funds should assess and address the needs of LEP individuals seeking assistance.

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

The intent of this plan is to ensure that LEP individuals have access to published information and transportation services in Pickaway County. The production of multilingual publications and documents and/or interpretation at meetings/events will be provided to the degree that funding permits based on current laws and regulations.

FACTOR 1: The number and Proportion of LEP Persons Served or Encountered in the Eligible Service Population.

1. Geographical Boundaries of the LPTS Service Area. LPTS services Fairfield County, Ohio



2. Analysis of U.S. Census Data. Data from the U.S. Census Bureau's 2010 Decennial Census (<http://quickfacts.census.gov/qfd/states/39/39045.html> and <http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=bkmk>) was analyzed as part of the process to determine the number or proportions of population groups eligible to be served. According to the US Census Bureau, in 2010, the population in Fairfield County was 146,156 persons. Of the persons five-years old and older (134,499), 129,291 of them (96%) speak English only. The next categories that show significant language usage other than English are the populations of Spanish speaking persons (2,053 – 1.5%) and Other Indo-European language speakers (1,816 – 1.4%). Less than 1/3 (602) of those identified as Spanish speaking individuals indicated they speak English less than very well, and this total represents .4% of the population studied. As for the Other Indo-European language speakers, the number indicating they speak English less than very well is 633 persons, 0.4% of the overall population. Persons who speak other languages are identified as Asian and "All other languages" comprise 1,339 persons out of the population study, 10% of the total of which only 536 speak English less than very well.

3. Concentrations of LEP Persons within the LPTS Service Area. The total percentage of "Linguistically Isolated Households" in Lancaster is 2.6% of the county population (approximately 3,800 people). The determination is that this is a "small LEP population".

FACTOR 2: The Frequency with Which LEP Individuals Come into Contact with LPTS Services.

1. LPTS Prior experiences with LEP Individuals. From 2008 to 2012, there has been only one reported individual that sought to use LPTS services that did not speak English. This individual was deaf and used ASL. The individual was able to communicate through an interpreting service to make trip reservations and by gestures with the driver.

FACTOR 3: The Importance of LPTS Services to LEP Persons.

1. Accessing Services. LPTS provides demand-responsive public transportation to the service area already mentioned in Factor 1. Other than LPTS, there is one taxi service that run in the City of Lancaster, but no other option for public transportation throughout Fairfield County. Persons accessing public transportation through LPTS utilize the services for employment, medical, educational, and social purposes. Many riders do not have any other means of transportation, and are truly transit dependent. As there have been so few encounters with LEP persons to date, it is only assumed that those individuals that are identified as LEP persons would most likely have similar reasons for using public transit. Working with our local department of Job and Family Services, we continue to work to identify LEP populations and how we may better serve those areas/individuals through outreach efforts and accessibility.

FACTOR 4: The Resources Available to the Recipient and Costs.

1. Accessing Available Resources. Currently, the manner in which encounters with LEP persons have been managed is by using other family members who can help communicate with LEP individuals or the LEP person has utilized written messages to accomplish the use of LPTS services.
2. Additional Services needed to Provide Meaningful Access. Although it is not likely that there will be very many more encounters with LEP persons in the foreseeable future, it is desirable to make every effort to remove any barriers that are presented to LEP persons to keep them from accessing LPTS services. LPTS is located in Lancaster, OH where there is a local branch of Ohio University which provides ASL interpreters that we may contact if necessary. We are able to use teachers in our local school district for languages such as Spanish, Latin, German or French. In addition, we offer our service brochure online which an individual may choose to translate via internet translation, and we offer an audio format in order to accommodate LEP persons who are either limited by other language barriers, or by those who have the inability to read. In addition, our staff each carries a one-page language identification card for any individual with limited English to request the appropriate language in which they would like an interpreter.
3. Accessing Budgetary Adjustments. LPTS will continue look for ways to improve the accessibility of our services through internet and printed material. Limited copies will be printed as the need is present; however it is very minor in the population of individuals throughout our service area.

Notifying the Public of Rights Under Title VI

- The Lancaster Public Transit 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 the Lancaster Public Transit.
- Notices are posted on our vehicles, in our administrative office, and in our public hearings.
- For more information on the Lancaster Public Transit civil rights program, and the procedures to file a complaint, contact 740-687-6858, (TTY 800-750-0750); email cwoody@ci.lancaster.oh.us; or visit our administrative office at 746 Lawrence Street, Lancaster, Ohio 43130. For more information, visit www.ci.lancaster.oh.us/dept/transit.
- 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 800-555-1212.

Public Participation Plan

Although LPTS has only experienced one encounter with an individual with LEP in the past four years, it is understood that the potential still exists for increased frequency. Based on the most recent 2010 census data, the second most utilized language in Fairfield County at a .3% usage is Spanish. Therefore, we will focus our efforts on providing alternate information in this language; however, we will also keep in mind that there were other languages identified in the census of which there is a potential for contact.

- Notification: LPTS has posted information onto our website and in all of our vehicles pertaining to the Public Rights under Title VI. We have also added Title VI information to our brochures to be printed in December 2012.
- Resources: LPTS staff will create a tracking system to record requests made by any individual with limited English proficiency. LPTS will work with local translators to create and make available alternate formats of our current printed and electronic publications in Spanish. In addition, LPTS will add a tagline that Spanish materials are available upon request to all printed and electronic English distributions. LPTS will begin to incorporate pictographs on material, in our administrative office and on our vehicles (e.g., no smoking, no eating, no drinking, etc)
- Since our last program submission (2008), we continue to work with our local Job & Family Services, Community Action Program, Homeless Services and Independent Living Centers to engage minority and limited English proficient populations in Fairfield County. LPTS has been utilizing a one-page language identification card in which individuals point to specify their language. This enables our staff reach an appropriate interpreter. This flyer is available at the Administrative office and with each driver on a vehicle. We are working with Language Line Services located in Monterey, CA for translation services and are also able to use teachers from local school districts for Spanish speaking individuals. In addition, there is an advocacy group that has helped us promote information to their Spanish speaking communities in the northwest corner of Fairfield County (2010).
- Translation materials: LPTS will work with local translators to create the following materials to be available in Spanish: page on the LPTS website, Elderly and Disabled application, one-page flyer, transit brochure. LPTS will post signs notifying the public of the alternate forms and will also notify local agencies and organizations of these materials when they are available. For long-range planning, LPTS will also look at the possibility and feasibility of including an automated telephone voice message for language assistance and how to access that assistance.
- Outreach efforts: LPTS will include information pertaining to LEP in the bi-annual surveys, conduct focus groups to develop an evaluation tool to assess the LEP service provision. LPTS will also work with members of the Coordinated Human Service Public Transportation Plan to coordinate additional surveys throughout the County.
- LPTS will review the LEP plan on an annual basis. This review will include staff training on the LEP policy and procedures to ensure everyone at LPTS knows how to appropriately and efficiently handle any experience or communication barrier that may arise.

Title VI Complaint Procedure

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the City of Lancaster Public Transit System (hereinafter referred to as "LPTS") may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. The City of Lancaster Public Transit System investigates complaints received no more than 180 days after the alleged incident. LPTS will process complaints that are complete.

Once the complaint is received, LPTS 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.

LPTS has 5 business days to investigate the complaint. If more information is needed to resolve the case, LPTS 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, LPTS can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

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 wishes to appeal the decision, she/he has 5 business days after the date of the letter or the LOF to do so.

A person 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.

TITLE VI COMPLAINT FORM	Section I:
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Name:

Address:

Telephone (Home):	Telephone (Work):
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Electronic Mail Address:

Accessible Format Requirements?	Large Print	Audio Tape	
	TDD	Other	

Section II:		
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Are you filing this complaint on your own behalf?	Yes*	No
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*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:	
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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
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Section III:		
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I believe the discrimination I experienced was based on (check all that apply):

Race Color National Origin Sex
 Age Disability Low Income

Date of Alleged Discrimination (Month, Day, Year): _____

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.

Section IV		
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Have you previously filed a Title VI complaint with this agency?	Yes	No
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Section V		
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Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?

Yes No

If yes, check all that apply:

Federal Agency: _____

Federal Court _____ State Agency _____

State Court _____ Local Agency _____

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

Name:

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

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

Signature

Date

***Signature and date required.

Please submit this form in person at the address below, or mail this form to:
 Administrator, City of Lancaster Public Transit System
 746 Lawrence Street
 Lancaster, Ohio 43130

LIST OF TRANSIT-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS (GENERAL REQUIREMENT)

All recipients must prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin:

- Active investigations conducted by FTA and entities other than FTA;
- Lawsuits; and
- Complaints naming the Transit System and/or Rural Grantee.

This list includes the date that the transit-related Title VI investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to the investigation, lawsuit, or complaint. This list shall be included in the Title VI Program submitted to ODOT every grant year.

Period: 1/1/2014- 8/31/2015	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations	NONE	N/A	N/A	N/A
1.				
2.				
Lawsuits				
1.				
2.				
Complaints				
1.				
2.				

*Send a copy of the Investigations, Lawsuits and Complaint table (see below) to [david.walker@dot.ohio.gov](mailto: david.walker@dot.ohio.gov).

*All documentation MUST be received by August 31, 2015.

LPTS Technical Advisory Matrix 2014-2015

Body	Caucasian	Latino	African American	Asian American	Native American
Population	96%	1.6%	1%	.5%	.3%
Technical Advisory Committee	83%	0%	17%	0%	0%

TEMPORARY RESOLUTION NO. 137-13

PERMANENT RESOLUTION NO. 132-13

A RESOLUTION FOR LANCASTER CITY COUNCIL TO ACCEPT AND APPROVE LPTS TITLE VI & LEP PROGRAMS, AND TO AUTHORIZE UPDATES TO BE MADE AS NEEDED BY THE ADMINISTRATOR

BE IT RESOLVED BY COUNCIL OF THE CITY OF LANCASTER, OHIO

SECTION 1. That Lancaster City Council, the governing board for the Lancaster Public Transit System (LPTS), accepts and approves the LPTS Title VI & LEP Programs and authorizes the LPTS Administrator to make such updates to the attachments of said Policy as may subsequently be necessary to maintain compliance with applicable directives of the Ohio Department of Transportation (ODOT).

SECTION 2. That this resolution shall take effect and be in force from and after the earliest period allowed by law.

Passed: 10/21/13 after 3rd reading. Vote: Yeas 9 Nays 0

Date Approved: 10/21/13

Clerk: Jeressa Lee Sandy

Kenna O'Callahan
President of Council

Don Matt
Mayor

Offered by: Melody L. Bobbitt

Second by: John Zerbe

Requested by Public Works Committee

Notifying the Public of Rights Under Title VI Lancaster Public Transit

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