



Title VI Program

Most recent update: October 24, 2012
October 12, 2015
April 16, 2019

THE CITY OF LANCASTER, PUBLIC TRANSIT

Non-Discrimination Policy Statement
Title VI and Americans with Disabilities Act (ADA)

- The City of Lancaster operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act and Americans with Disabilities Act (ADA). Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI and/or ADA may file a complaint with the City of Lancaster.
- For more information on the City of Lancaster civil rights program visit <http://www.ci.lancaster.oh.us/242/Transit> or you may file a complaint with the Service Safety Director at
104 E. Main Street
Lancaster, Ohio 43130
740-687-6608, (TTY 800-750-0750)
servicedirector@ci.lancaster.oh.us
- You may file a complaint directly to the Ohio Department of Transportation
Division of Opportunity, Diversity, and Inclusion
Office of Equal Opportunity
1980 West Broad Street, Mail Stop 3270
Columbus, OH 43223
www.transportation.ohio.gov/TitleVI
- Or you may file a complaint directly to the Federal Transit Administration at
US DOT
1200 New Jersey Avenue SE
Washington, DC 20590
- This information is available on the transit website, in vehicles, brochures and publications pertaining to public transit. If information is needed in another language, contact 740-681-5086.

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 (hereinafter referred to as “the City”) may file a Title VI complaint by completing and submitting the agency’s Title VI Complaint Form. The City of Lancaster investigates complaints received no more than 180 days after the alleged incident. The City will process complaints that are complete.

Once the complaint is received, the City 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.

The City has 15 business days to investigate the complaint. If more information is needed to resolve the case, the City 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 City 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. A 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 15 business days after the date of the letter or the LOF to do so.

For transportation-related Title VI matters, a person may also file a complaint directly with the Ohio Department of Transportation Division of Opportunity, Diversity and Inclusion, Office of Equal Opportunity located at 1980 West Broad Street Mail Stop 3270, Columbus, OH 43223, or at www.transportation.ohio.gov/TitleVI

For transportation-related Title VI matters, a persona may also file a complaint directly with the U.S. DOT or Federal Transit Administration located at 1200 New Jersey Avenue SE, Washington, DC 20590.

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:

City of Lancaster, Service Safety Director

104 East Main Street

Lancaster, Ohio 43130

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 City's Public Transit Service Area. The City's Public Transit 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 City's Public Transit 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 THE CITY Services.

1. The City's Prior experiences with LEP Individuals related to transportation. From 2008 to 2018, there has been only one reported individual that sought to use the City's Public Transit 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 THE CITY Services to LEP Persons.

1. Accessing Services. The City provides demand-responsive public transportation to the service area already mentioned in Factor 1. Other than the City, there is one taxi service that runs in the City of Lancaster, but no other option for public transportation throughout Fairfield County. Persons accessing public transportation through the City 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 the City 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 the City services. The City 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. The City 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.

Although the City has only experienced one encounter with an individual with LEP in the past four years related to transportation, 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: the City 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: the City staff will create a tracking system to record requests made by any individual with limited English proficiency. The City will work with local translators to create and make available alternate formats of our current printed and electronic publications in Spanish. In addition, the City will add a tagline that Spanish materials are available upon request to all printed and electronic English distributions. The City 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. The City 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: the City will work with local translators to create the following materials to be available in Spanish: page on the City website, Elderly and Disabled application, one-page flyer, transit brochure. The City 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, the City 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: the City 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. The City will also work with members of the Coordinated Human Service Public Transportation Plan to coordinate additional surveys throughout the County.
- The City 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 the City knows how to appropriately and efficiently handle any experience or communication barrier that may arise.

PUBLIC PARTICIPATION PLAN:

Currently, our LEP population is extremely limited.

- a. TAC meetings as well as all public hearings for City of Lancaster, Public Transit, will be at locations and times convenient and accessible for minority and LEP riders. Whenever public hearings are held to address important issues such as fare increases or major service reductions, more than one public hearing will be held to allow better access to LEP persons. We also offer free fares to individuals wanting to attend TAC meetings and/or public hearings to make certain fares not an obstacle.
- b. TAC & public hearings are advertised as open to the public and held at accessible locations. TAC meetings are held at the transit facility on normally at 2:00 pm on Friday, bi-monthly. Public hearings are held at the City Council Chamber Monday at 7:00 pm twice a month and are normally telecast on public TV. By having meetings at two different times and locations, it allows more flexibility for those on set schedules. We make efforts to post our meeting notice through all local human service agencies, including JFS. If the meeting pertains to service change or fare increase. We will be flexible to accommodate requests at other times and locations if made aware of the need. Any cancellations would be posted on the City's website, and sent out electronically.
- c. We will work with JFS, and our local school districts to reach out to the LEP population in our community. We also work with local radio and newspapers for public service announcements.
- d. During our marketing campaign, we will address the LEP guidelines to make other organizations aware.

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

Period: 1/1/2012- 8/31/2019	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	NONE	N/A	N/A	N/A
1.				
2.				
Complaints	NONE	N/A	N/A	N/A
1.				
2.				

*Send a copy of the Investigations, Lawsuits and Complaint table (see below) to aisha.powell@dot.ohio.gov

*All documentation MUST be received by August 31.

THE CITY Technical Advisory Matrix 2019

Body	Caucasian	Black or African American	Asian	Native Hawaiian & Other Pacific Islander	American Indian & Alaska Native	Other Race	Two or More Races
Population	90.20%	6%	1.10%	>0.1%	0.20%	0.60%	1.90%
Technical Advisory Committee	100%	0%	0%	0%	0%	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 Administer 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: Jeresa Lee Sandy

Kenna O'Connell
President of Council

William Whitt
Mayor

Offered by: Melody L. Bobbitt

Second by: John Zwick

Requested by Public Works Committee