

***Federal Transit Administration
Title VI Program***

Ottawa County Transit Board

October 28, 2022

(Plan expires 3 years from date approved by the board)

Title VI Plan Table of Contents

The Ottawa County Transit Board Title VI plan includes the following elements:

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Title VI Plan
Adopted on: October 28, 2022

Adopted by: Ottawa County Transit Board

Signature(s): _____

(Documentation of Board Approval on TBD is attached)

Title VI Plan Revision Log

Date Month/day/year	Section Revised	Summary of Revisions
October 28, 2022	Entire Title VI Plan	Updates as required by Ohio Department of Transportation – Office of Transit

Section 2: Title VI Policy Statement

Policy Statement

The Ottawa County Transit Board, operating demand response transit provider, as a recipient of Federal Transit Administration (FTA) grant dollars either directly from FTA or through the Ohio Department of Transportation (ODOT), will comply with the Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the U.S. Department of Transportation implementing regulations, FTA Circular 4702.1B, and ODOT Public Transportation requirements as specified in Master Grant Agreement, and State Management Plan.

Section 3: Notice to the Public

Title VI Notice to the Public

The Ottawa County Transit Board Notice to the Public is as follows:

Notifying the Public of Rights Under Title VI

Ottawa County Transit Board

- The **Ottawa County Transit Board** 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 **Ottawa County Transit Board**.
- For more information on the Ottawa County Transit Board's civil rights program, the procedures to file a complaint, or to file a complaint contact **888-898-7433 (TTY 800-750-0750)**, email lblair@octapublictransit.org; or visit our administrative office at **275 N. Toussaint South Road, Oak Harbor, OH 43449**. For more information, visit www.octapublictransit.org.

- A complaint may also be filed directly with the:

Ohio Department of Transportation, Attn: Office of Equal Opportunity, 1980 West Broad Street, Mailstop 3270, Columbus, OH 43223; or

Federal Transit Administration, Office of Civil Rights, Attention: Complaint Team, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

- If information is needed in another language, contact **888-898-7433**.
- Si necesita información en otro idioma, comuníquese con **888-898-7433**.

The **Ottawa County Transit Board** Notice to the Public is posted in the public areas of the office, inside the transit vehicles and on the website.

Section 4: Title VI / ADA Complaint Procedure

The **Ottawa County Transit Board's** Title VI / ADA Complaint Procedure is made available in the following locations:

- Agency website, if available: www.octapublictransit.org
 - Hard copy in the central office
 - Agency Title VI Plan
-

Any individual, group of individuals or entity that believes they have been discriminated against on the basis of race, color, national origin or disability by the **Ottawa County Transit Board** may file a Title VI / ADA complaint by completing and submitting the agency's Title VI / ADA Complaint Form.

Any individual having filed a complaint or participated in the investigation of a complaint shall not be subjected to any form of intimidation or retaliation. Individuals who have cause to think that they have been subjected to intimidation or retaliation can file a complaint of retaliation following the same procedure for filing a discrimination complaint.

A complaint must be filed with the **Ottawa County Transit Board** no later than 180 days after the following:

1. The date of the alleged act of discrimination; or
2. The date when the person(s) became aware of the alleged discrimination; or
3. Where there has been a continuing course of conduct, the date on which that conduct was discontinued of the latest instance of the conduct.

Once the complaint is received, the **Ottawa County Transit Board** will review it to determine if our office has jurisdiction. (A copy of each Title VI complaint received will be forwarded to the Ohio Department of Transportation within ten (10) calendar days of receipt). The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

The **Ottawa County Transit Board** has 45 days to investigate the complaint. If more information is needed to resolve the case, the **Ottawa County Transit Board** may contact the complainant.

After the investigator reviews the complaint, she/he will issue one of two (2) 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 letter of finding (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 30 days after the date of the closure letter or the letter of finding to do so.

A person may also file a complaint directly with the: Ohio Department of Transportation, Attn: Office of Equal Opportunity, 1980 West Broad Street, Mailstop 3270, Columbus, OH 43223, or Federal Transit

Administration, Office of Civil Rights, Attention: Complaint Team, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

If information is needed in another language, then contact 888-898-7433.

Section 5: Title VI / ADA Complaint Form

The **Ottawa County Transit Board's** Title VI / ADA Complaint Procedure is made available in the following locations:

- Agency website, if available: www.octapublictransit.org
- Hard copy in the central office
- Agency Title VI Plan

Section I:			
Name:			
Address:			
Telephone (Home):		Telephone (Work):	
Email Address:			
Accessible Requirements?	Format	Large Print TDD	Audio Tape 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	<input type="checkbox"/> Disability
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			
Have you previously filed a Title VI complaint with this agency?		Yes	No

Section 6: List of Transit Related Title VI Investigations, Complaints and Lawsuits

The **Ottawa County Transit Board** maintains a list or log of all Title VI investigations, complaints and lawsuits, pertaining to its transit-related activities.

Check One:

 X There have been no investigations, complaint and/or lawsuits filed against us since the last plan submission.

 There have been investigations, complaints and/or lawsuits filed against us. *See list below. Attach additional information as needed.*

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations				
1.				
2.				
Lawsuits				
1.				
2.				
Complaints				
1.				
2.				

Section 7: Public Participation Plan

Strategies and Desired Outcomes

To promote inclusive public participation, the **Ottawa County Transit Board** will employ the following strategies, as appropriate (make these determinations based on a demographic analysis of the population(s) affected, type of plan, program and/or service under consideration, and the resources available):

- ✓ Provide for early, frequent and continuous engagement by the public.
- ✓ Select accessible and varied meeting locations and times
- ✓ Employ different meeting sizes and formats
- ✓ Use social media in addition to other resources as a way to gain public involvement
- ✓ Use radio, television or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations may also include audio programming available on podcasts.
- ✓ Expand traditional outreach methods by visiting ethnic stores/markets and restaurants, community centers, libraries, faith-based institutions, local festivals, etc.

Public Outreach Activities

The public outreach and involvement activities conducted by the **Ottawa County Transit Board** since the last Title VI Program submission are summarized in the table below.

Enter specific Public Participation activities in the table below.

Event Date	Ottawa County Transit Board Staffer(s)	Activity	Communication Method (Public Notice, Posters, Social Media)	Notes
December 2019	Director	Senior Holiday Open House	Web, fliers, newsletter	Approximately 200 seniors attended
December 2021	Director	Senior Holiday Open House	Web, fliers, newsletter	Approximately 100 seniors attended
2019	N/A	Advertisement	Billboards	General public transit information about OCTA
2020	N/A	Advertisement	Billboards	General public transit information about OCTA
2021	N/A	Advertisement	Billboards	General public transit information about OCTA
2019	N/A	Advertisement	Newspaper	General public transit information about OCTA
2020	N/A	Advertisement	Newspaper	General public transit information about OCTA
2021	N/A	Advertisement	Newspaper	General public transit information about OCTA

Section 8: Language Assistance Plan

Plan Components

As a recipient of federal US DOT funding, the **Ottawa County Transit Board** is required to take reasonable steps to ensure meaningful access to our programs and activities by limited-English proficient (LEP) persons.

Limited English Proficient (LEP) refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak or understand English. This includes those who have reported to the U.S. Census that they speak English less than very well, not well, or not at all.

The **Ottawa County Transit Board's** Language Assistance Plan includes the following elements:

Item #1: The results of the *Four Factor Analysis*, including a description of the LEP population(s), served.

Item #2: A description of how language assistance services are provided by language

Item #3: A description of how LEP persons are informed of the availability of language assistance service

Item #4: A description of how the language assistance plan is monitored and updated

Item #5: A description of how employees are trained to provide language assistance to LEP persons

Four Factor Analysis Methodology

To determine if an individual is entitled to language assistance and what specific services are appropriate, the **Ottawa County Transit Board** has conducted a *Four Factor Analysis* of the following areas: 1) LEP Demography, 2) Contact Frequency, 3) Importance of Service, and 4) Resources and Costs.

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient. In addition to the number or proportion of LEP persons served, the **Ottawa County Transit Board's** will identify:

- (a) How LEP persons interact with the recipient's agency;
- (b) Identification of LEP communities, and assessing the number or proportion of LEP persons from each language group to determine the appropriate language services for each language;
- (c) The literacy skills of LEP populations in their native languages, in order to determine whether translation of documents will be an effective practice; and
- (d) Whether LEP persons are underserved by the recipient due to language barriers.

Factor 2: The frequency with which LEP persons come into contact with the program.: Identifies and assesses the frequency **Ottawa County Transit Board's** staff comes into contact with LEP persons. Examples of contact could include:

- (a) Use of bus and rail service;

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- (b) Purchase of tickets through vending machines, outlets, websites, and over the phone;
- (c) Participation in public meetings;
- (d) Customer service interactions;
- (e) Ridership surveys;
- (f) Operator surveys.

Factor 3: The nature and importance of the program, activity, or service provided by the program to people’s lives. Generally speaking, the more important the program, the more frequent the contact and the likelihood that language services will be needed.

This section discusses how the **Ottawa County Transit Board’s** program and services impact the lives of people within the community. The **Ottawa County Transit Board** will specify the community organizations that serve LEP persons, if available.

Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach. Resource and cost issues can often be reduced by technological advances, reasonable business practices, and the sharing of language assistance materials and services among and between recipients, advocacy groups, LEP populations and Federal agencies. Large entities and those entities serving a significant number of LEP persons should ensure that their resource limitations are well substantiated before using this factor as a reason to limit language assistance.

The summary below discusses the low-cost methods the **Ottawa County Transit Board** uses to provide outreach to LEP persons as well as train staff (and transit provider/lessee, if applicable) on Title VI and LEP principles.

Item #1 – Results of the Four Factor Analysis (including a description of the LEP population(s) served)

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered.

The **Ottawa County Transit Board’s** staff reviewed the latest U.S. Census Bureau data reports (either the decennial Census or the American Community Survey). Of the 38,961 residents in **Ottawa County Transit Board’s** service area, 250 residents describe themselves as speaking English less than “very well”. People of Hispanic descent are the primary LEP persons likely to utilize Ottawa County Transit Board’s services. For Ottawa County Transit Board’s service area, the latest U.S. Census Bureau data shows that among the area’s population 0.64%% speak English “less than very well.” **For these groups** who speak English “less than very well”, 23.4% speak Spanish.

Ottawa County – Languages Spoke at Home

	Total Number	Percent of Population	Total Population of County
Speak Language other than English	1,199	0.31%	38,961
Speak English Less than Very Well	250	0.64%	38,961
Spanish	757	1.94%	38,961
Other Indo-European Languages	264	0.68%	38,961
Asian and Pacific Island Languages	57	0.07%	38,961
Other Languages	121	0.31%	38,961

Factor 2: The frequency with which LEP persons come into contact with the program.

Ottawa County Transit Board assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. **Ottawa County Transit Board** provides approximately 80,000 passenger trips per year. If an individual has speech limitations, the dispatcher or driver will work with the Transit Manager and ODOT, if needed, to ensure the individual receives access to the transit services.

Factor 3: The nature and importance of the program, activity, or service provided by the program to people’s lives.

All of **Ottawa County Transit Board’s** programs are important; however, those related to safety, public transit, nondiscrimination and public involvement are among the most important. The **Ottawa County Transit Board** is committed to providing meaningful access and will provide written translation for any of its documents, when reasonable, effective and with the available resources. In other cases, the **Ottawa County Transit Board** will strive to provide alternative but meaningfully accessibility. Moreover, the **Ottawa County Transit Board** continually evaluates its programs, services, and activities to ensure that persons who may be LEP are always provided with meaningful access. The Title VI policy, complaint form, and LEP policy are available in Spanish upon request.

Factor 4: The resources available for LEP outreach, as well as the costs associated with that outreach.

The **Ottawa County Transit Board** makes every effort to make its programs, services, and activities, accessible to LEP individuals. The **Ottawa County Transit Board** will use available resources, both internal and external to accommodate reasonable requests for translations.

Item # 2 – Description of how Language Assistance Services are Provided, by Language

The **Ottawa County Transit Board** has identified, developed, and uses the following:

- a) Individuals who have contact with the public are provided with “I Speak” language cards to identify language needs in order to match them with available services. Language cards verified and distributed by the Director as need.
- b) The **Ottawa County Transit Board** has developed partnerships with local agencies, organizations, law enforcement, colleges/universities, local school districts and social service agencies that are available to assist with it LEP responsibilities.
- c) A list of web-based translation services can be provided by contracting the Human Resources Department.

Item # 3 - Description of how LEP Persons are Informed of the Availability of Language Assistance Service

In order to ensure that LEP individuals are aware of **Ottawa County Transit Board’s** language assistance measures, **Ottawa County Transit Board** provides the following:

- Title VI Program including the Language Assistance Plan is made available on website, if applicable, and hard copy in central office.

- Drivers and dispatchers are provided “I Speak” language cards to identify language needs in order to match them with available services.

Item # 4 – Description of how the Language Assistance Plan is Monitored and Updated

Ottawa County Transit Board will continue to update the LEP plan as required by U.S. DOT. At a minimum, the plan will continue to be reviewed and updated every three (3) years in conjunction with the Title VI submission, or when data from the 2020 U.S. Census is available, or when it is clear that the concentrations of LEP individuals are present in the **Ottawa County Transit Board** service area.

Updates will continue to include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether **Ottawa County Transit Board’s** financial resources are sufficient to fund language assistance resources needed.
- Determine whether **Ottawa County Transit Board** has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning **Ottawa County Transit Board’s** failure to meet the needs of LEP individuals

Item # 5 - Description of how Employees are Trained to Provide Language Assistance to LEP Persons

The following training will continue to be provided to **Ottawa County Transit Board** staff:

- Information on the **Ottawa County Transit Board** Title VI Procedures and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of “I Speak” language cards (used to identify language preference).
- Documentation of language assistance requests.
- Use of web-based interpreter services (over the phone interpretation provider).
- How to handle a potential Title VI / LEP complaint.

Limited English Proficient (LEP) Resource Materials:

LEP Policy

Ottawa County Transit Board shall provide for communication for limited English proficient riders to ensure them equal opportunity to benefit from services. Family members or friends of limited English proficient riders will not be used as translators unless specifically requested by that individual. Arrangements have been made with specific vendors to obtain translators. The agency will also utilize web-based translator programs if available.

If you need help with English, please call 888-898-7433.

Si usted necesita ayuda con el inglés, por favor llame 888-898-7433.

“I Speak” Language Identification Card

Mark this Box if you speak...	Language Identification Chart	Language
	Mark this box if you read or speak English	English
	Marque esta casilla si lee o habla español	Spanish
	Kos lub voj no yog koj paub twm thiab hais lus Hmoob	Hmong
	如果说中国在方框内打勾	Chinese
	Xin ñaùnh daáu vaø oâ naøy neáu quyù vò bieát ñoïc vaø noùi ñöøic Vieät Ngöõ.	Vietnamese
	당신이한국어말할경우이 상자를표시	Korean
	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	Tagalog
	Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen	German
	Отметить этот флажок, если вы говорите по-русски	Russian
	Означите ову кућицу ако говорите српски	Serbian
	आप हिंदी बोलते हैं तो इस बक्से को चिह्नित करें	Hindi
	پر نشان لگائیں تو اس باکس بولتے ہیں اردو اگر آپ	Urdu

Note: For additional languages visit the US Census Bureau website <http://www.lep.gov/ISpeakCards2004.pdf>

Log of LEP Encounters

Date	Time	Language Spoken By Individual <i>(if available)</i>	Name and Phone Number of Individual <i>(if available)</i>	Service Requested	Follow Up Required	Staff Member Providing Assistance	Notes

Section 9: Minority Representation Information

Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

Guidance: Elected transit-related board, committee, or council, do not need to complete the table below, and write in section B that there are no non-elected transit-related boards, committees, or councils.

A. Minority Representation Table

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

Body	Caucasian	Hispanic	African American	Asian American	Native American	Two or More Races
Population	92.35%	5.10%	0.89%	0.43%	0.19%	4.93%
Ottawa County Transit Board	100%	0%	0%	0%	0%	0%

B. Efforts to Encourage Minority Participation

*To encourage participation on its boards, committees and councils, the **Ottawa County Transit Board** will make every effort to encourage minority participation on the boards.*

Section 10: Providing Assistance to and Monitoring Subrecipients

1. Does agency provide funding to subrecipients?

No, the agency does not have subrecipients.

Yes. If yes, list the subrecipient names: (list other agency names here)

Ottawa County Transit Board monitors subrecipients using the following process:

1. Ottawa County Transit Board uses the following process for ensuring all subrecipients are complying with the general reporting requirements of FTA C4702.1B: (document the process here)
2. Ottawa County Transit Board collects Title VI programs from the subrecipients listed above and reviews programs for compliance by (list the process here)

Section 11: Title VI Equity Analysis

1. Has the agency built a facility? (check a response below)

No, the agency has not built a facility.

Yes, the agency has built a facility and completed a Title VI equity analysis to compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site. (Include at the end of the TVI plan a copy of the Title VI equity analysis.)

Section 12: Requirements for Metropolitan Planning Organizations (MPOs)

N/A

All MPOs must meet the following requirements if the agency is included in the MPO constituency.

MPO Requirements (Ref: FTA Circular 4702.1B Chapter VI)	Status
1) Does the plan contain a demographic profile of the metropolitan area that includes identification of the locations of minority populations in the aggregate?	<input type="checkbox"/> Y <input type="checkbox"/> N
2) A description of the procedures by which the mobility needs of minority populations are identified and considered within the planning process?	<input type="checkbox"/> Y <input type="checkbox"/> N
3) Demographic maps that overlay the percent minority and non-minority populations as identified by Census or American Community Survey (ACS) data, at the Census tract or block group level, and charts that analyze the impacts of the distribution of State and Federal funds in the aggregate for public transportation purposes, including federal funds managed by the MPO as a designated recipient?	<input type="checkbox"/> Y <input type="checkbox"/> N
4) Analysis of disparate impacts on the basis of race, color, or national origin, and, if so, determines whether there is a substantial legitimate justification for the policy that resulted in the disparate impacts, and if there are alternatives that could be employed that would have a less discriminatory impact.	<input type="checkbox"/> Y <input type="checkbox"/> N

Approved October 28, 2022 by the Ottawa County Transit Board

Board Chair

Date

August 2022

No, the agency does not have subrecipients.

Yes. If yes, list the subrecipient names: (list other agency names here)

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1. Ottawa County Transit Board uses the following process for ensuring all subrecipients are complying with the general reporting requirements of FTA C4702.1B: (document the process here)
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MPO Requirements (Ref: FTA Circular 4702.1B Chapter VI)

Status

- | | |
|---|---|
| 1) Does the plan contain a demographic profile of the metropolitan area that includes identification of the locations of minority populations in the aggregate? | <input type="checkbox"/> Y <input type="checkbox"/> N |
| 2) A description of the procedures by which the mobility needs of minority populations are identified and considered within the planning process? | <input type="checkbox"/> Y <input type="checkbox"/> N |
| 3) Demographic maps that overlay the percent minority and non-minority populations as identified by Census or American Community Survey (ACS) data, at the Census tract or block group level, and charts that analyze the impacts of the distribution of State and Federal funds in the aggregate for public transportation purposes, including federal funds managed by the MPO as a designated recipient? | <input type="checkbox"/> Y <input type="checkbox"/> N |
| 4) Analysis of disparate impacts on the basis of race, color, or national origin, and, if so, determines whether there is a substantial legitimate justification for the policy that resulted in the disparate impacts, and if there are alternatives that could be employed that would have a less discriminatory impact. | <input type="checkbox"/> Y <input type="checkbox"/> N |

Approved October 28, 2022 by the Ottawa County Transit Board



Board Chair

10-28-22

Date

August 2022