

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

**Coshocton County Coordinated
Transportation Agency (CCCTA)**

April 15, 2020

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

Title VI Plan Table of Contents

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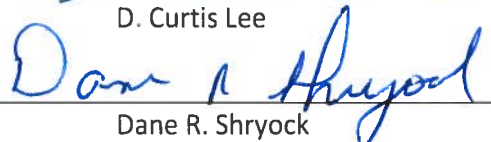
Section 1: Title VI Plan Approval

Title VI Plan
Adopted on: April 15, 2020

Adopted by: Coshocton County Board of Commissioners

Signature(s): 
Gary L. Fischer


D. Curtis Lee


Dane R. Shryock

*Meeting minutes of approval included at the end of this plan.

Title VI Plan Revision Log

Date Month/day/year	Section Revised	Summary of Revisions

Section 2: Title VI Policy Statement

Policy Statement

The Coshocton County Coordinated Transportation Agency , operating demand response transit provider and public transportation, 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. The Coshocton County Coordinated Transportation Agency operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act.

Section 3: Notice to the Public

Title VI Notice to the Public

The Coshocton County Coordinated Transportation Agency's Notice to the Public is as follows:

Notifying the Public of Rights Under Title VI

The Coshocton County Coordinated Transportation Agency (CCCTA)

- The Coshocton County Coordinated Transportation Agency 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 Coshocton County Coordinated Transportation Agency.
- For more information on the Coshocton County Coordinated Transportation Agency's civil rights program, the procedures to file a complaint, or to file a complaint, please contact Mary Beck, Administrator/Clerk Board of Commissioners at (740)622-1753, (TTY 1-800-750-0750); email marybeck@coshoctoncounty.net or visit our administrative office at 401 ½ Main Street, Coshocton, OH 43812. For more information, visit www.coshoctoncounty.net/transportation.
- 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 Valerie Shaw, Transportation Director at (740)622-7139.

The **Coshocton County Coordinated Transportation Agency's** Notice to the Public is posted in the public areas of the office and inside the transit vehicles.

1. 401 Main Street, Coshocton, OH 43812
2. 401 ½ Main Street, Coshocton, OH 43812
3. 349 Main Street, Coshocton, OH 43812

Title VI Notice to the Public in Spanish

Note: The translation of vital documents must be verified for accuracy. You cannot assume that what is written in this template accurately conveys the rights included in your Title VI notice. You also cannot rely on Google Translate without additional verification.

Notificación al público de derechos bajo el Título VI

- El Coshocton County Coordinated Transportation Agency opera sus programas y servicios sin distinción de raza, color y origen nacional, según el Título VI de la Ley de Derechos Civiles. Cualquier persona que cree o que ha sido perjudicada por una práctica discriminatoria ilegal bajo el Título VI puede presentar una queja con el Coshocton County Coordinated Transportation Agency.
- Para obtener más información sobre el programa de derechos civiles de Coshocton County Coordinated Transportation Agency, o para obtener más información sobre los procedimientos para presentar una queja, por favor llame a Mary Beck, Administrator/Clerk Board of Commissioners at (740)622-1753, (TTY 1-800-750-0750); email marybeck@coshoctoncounty.net, o visite nuestra oficina administrativa en 401 ½ Main Street, Coshocton, OH 43812.
- Un demandante puede presentar una queja directamente a la el Departamento de Transporte del estado de Ohio, Attn: Office of Equal Opportunity, 1980 West Broad Street, Mailstop 3270, Columbus, OH 43223.
- Un demandante puede presentar una queja directamente a la Administración Federal de tránsito, Office of Civil Rights, Atención: Complaint Team, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.
- Si se necesita información en otro idioma, comuníquese con (740)622-7139.

Section 4: Title VI Complaint Procedure

The Coshocton County Coordinated Transportation Agency's Title VI Complaint Procedure is made available in the following locations:

- ☒ Agency website: www.coshoctoncounty.net/transportation/
 - ☒ 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, or national origin by the Coshocton County Coordinated Transportation Agency may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form to Mary Beck, Administrator/Clerk, Coshocton County Board of Commissioners.

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 Mary Beck, Administrator/Clerk Coshocton County Board of Commissioners 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 or the latest instance of the conduct.

Once the complaint is received, Mary Beck, Administrator/Clerk Coshocton County Board of Commissioners 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.

Mary Beck, Administrator/Clerk Coshocton County Board of Commissioners has 45 days to investigate the complaint. If more information is needed to resolve the case, the Administrator/Clerk Coshocton County Board of Commissioners may contact the complainant requesting further information. 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 Administrator/Clerk Coshocton County Board of Commissioners can administratively close the case.

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 15 days after the date of the closure letter or the letter of finding to do so. The appeal process information will be included in the letter.

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 (740)622-7139.

Section 5: Title VI Complaint Form

The Coshocton County Coordinated Transportation Agency's Title VI Complaint Procedure is made available in the following locations:

- ☒ Agency website: www.coshoctoncounty.net/transportation/
- ☒ 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		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):					
[] Race		[] Color		[] 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 this form.					
Section IV					

Have you previously filed a Title VI complaint with this agency?	Yes	No
Section V		
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?		
<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, check all that apply: <input type="checkbox"/> Federal Agency: _____ <input type="checkbox"/> Federal Court _____ <input type="checkbox"/> State Agency _____ <input type="checkbox"/> State Court _____ <input type="checkbox"/> 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 and date required below

Signature

Date

If information is needed in another language, contact (740)622-7139.

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

Mary Beck, Administrator/Clerk
Coshocton County Board of Commissioners
401 ½ Main Street
Coshocton, OH 43812

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

The **Coshocton County Coordinated Transportation Agency** maintains a list or log of all Title VI investigations, complaints and lawsuits, pertaining to its transit-related activities.

Check One:

☒ 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 Coshocton County Coordinated Transportation Agency 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 Coshocton County Coordinated Transportation Agency since the last Title VI Program submission are summarized in the table below.

Enter specific Public Participation activities in the table below

Event Date	Coshocton County Coordinated Transportation Agency Staffer(s)	Activity	Communication Method (Public Notice, Posters, Social Media)	Notes
1-19-19	Valerie & Tracy	Health & Wellness Expo	Add in Beacon & Display Table at Expo	Open to public
3-13-19	Valerie & Tracy	Transportation Advisory Board Meeting	In person meeting	Open to public
3-13-19	Valerie	Kno-Ho-Co CAC Senior Center	Public Speaking distributed agency literature	Open to public. Large group of senior citizens
4-24-19	Valerie & Tracy	Career Center open house	Display table at venue/distributed literature for CCCTA and County resources	Open to public
6-13-19	Valerie & Tracy	Transportation Advisory Board Meeting	In person meeting	Open to public
6-17-19	Tracy	Handicapped Society Meeting	Spoke to group & Distributed literature	Open to public
8-12-19	Valerie	Public Hearing during Cosh. Co. Board of	Public Hearing for 5311 Rural Public Transportation System	Open to Public

		Commissioners open session		
9-12-19	Valerie & Tracy	Transportation Advisory Board Meeting	In person meeting	Open to public
9-26-19 through 10-3-19	All CCCTA Staff Valerie & Tracy	Coshocton County Fair	Display Booth & distributed literature	Open to public. Made contacts with medical providers and individuals beyond Coshocton County
10-1-19	Valerie & Tracy	Public Survey	Online survey in junction with OMEGA and paper surveys	To assist with 2020 re-write of the LDTP and to help structure 5311 Public Transportation
11-14-19	Valerie & Tracy	Kno-Ho-Co CAC Senior Center	Public Speaking distributed agency literature	Open to public. Large group of senior citizens
11-21-19	Valerie & Tracy	50+ Expo @ Village Inn & Suites	30 Radio adds w/WTNS Radio & Display Table at Expo. Distributed literature	Open to public
12-12-19	Valerie & Tracy	Transportation Advisory Board Meeting	In person meeting	Open to public
1-16-20	Tracy	Raise Your Voice Group	Speaking, Survey & literature	Spoke to group of individuals with developmental disabilities
1-23-20	Tracy	Head Start	Public speaking, survey & info on new 5311 Public Transportation	Spoke to Head Start staff and parent group
1-30-20	Tracy	Family and Children First Council	Shared County resources, literature and info on new 5311 Public Transportation	Dropped of literature for their clients.
2-11-20	Valerie & Tracy	Adult Protective Services & DJFS	Spoke to Agency Providers and provided literature for county resources and new 5311 Public Transportation	Group consisted of agency representatives
3-10-20	Tracy	First Step Family & Domestic Violence Center	Spoke to agency staff regarding new 5311 Public Transportation & shared literature	Spoke to agency staff and left literature for their clients
3-12-20	Valerie & Tracy	Transportation Advisory Board Meeting	In person meeting	Open to public

Section 8: Language Assistance Plan

Plan Components

The Coshocton County Coordinated Transportation Agency'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

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

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

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 Coshocton County. The production of multilingual publications and documents and/or interpretation at meeting/events will be provided to the degree that funding permits based on current laws and regulations.

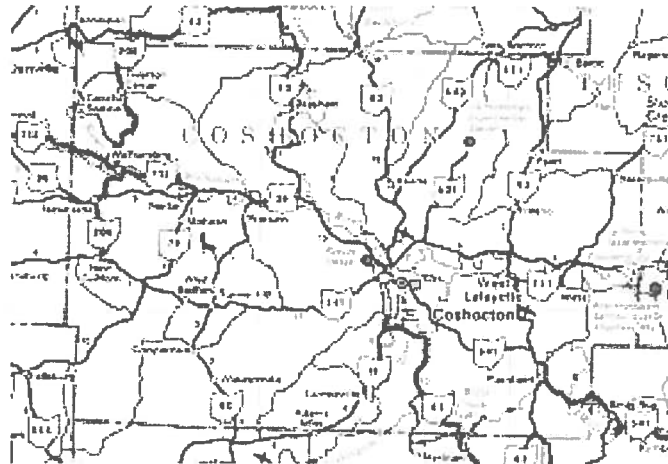
Four Factor Analysis Methodology

To determine if an individual is entitled to language assistance and what specific services are appropriate, the Coshocton County Coordinated Transportation Agency 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 Coshocton County Coordinated Transportation Agency 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.

Geographical Boundaries of CCCTA's Service Area. Coshocton County's Coordinated Public Transit services.



Analysis of U.S. Census Data. Data from the U.S. Census Bureau's 2018 American Community Survey was analyzed as part the process to determine the number or proportions of population groups eligible to be served. According to the U.S. Census Bureau, in 2018, the population in Coshocton County was 36,629. 90.44% or 31,225 (based on all ages) of Coshocton County, Ohio residents speak only English, while 9.56% or 3,103 individuals speak other languages. The non-English language spoken by the largest group is Other Indo-European, which is spoken by 2,828 individuals or 8.57% of the population. There are 206 individuals or .6%, which speak Spanish, 68 individuals, or .2% are Asian or Pacific Island Language speaking and there is 1 (0%) person documented as speaking another language.

<https://data.census.gov/cedsci/profile?q=Coshocton%20County,%20Ohio&g=0500000US39031>

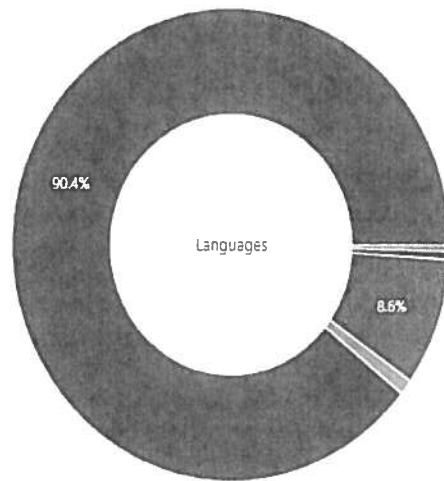
Coshocton County, Ohio Language by Age

All Ages

5-17

18-64

65+



■ Only English ■ Spanish ■ Other Indo-European Languages ■ Asian and Pacific Island Languages ■ Other Languages

Coshocton County, Ohio Language

90.44% of Coshocton County, Ohio residents speak only English, while 9.56% speak other languages. The non-English language spoken by the largest group is Other Indo-European, which is spoken by 8.57% of the population.

Concentrations of LEP Persons within the CCCTA's Public Transit Service Area. The total percentage of "Linguistically Isolated Households" in Coshocton was unattainable. However, an estimated 3.7% or 1,285 Coshocton County residents 5 years and over speak English less than "very well". An estimated 9% or 3,103 county residents 5 years and older speak a language other than English. The determination is that this is a "small LEP population".

Factor 2: The frequency with which LEP persons come into contact with the Program: Identifies and assesses the frequency The Coshocton County Coordinated Transportation Agency's staff comes into contact with LEP persons. Examples of contact could include:

- (a) Use of bus service;
- (b) Purchase of tickets in office;
- (c) Participation in public meetings;
- (d) Customer service interactions;
- (e) Ridership surveys;
- (f) Operator surveys.

The Agency's Prior experiences with LEP Individuals related to transportation. From 2008 to 2018, there have been no reports of anyone who uses CCCTA's service requesting the use of an interpreting service to make trip reservations or to correspond with the CCCTA office. Prior to 2008 CCCTA did provide services to an individual with a hearing impairment. The individual was able to communicate with the CCCTA office through the Relay Ohio Program.

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 CCCTA's program and services impact the lives of people within the community. The CCCTA specify the community organizations that serve LEP persons, if available.

Accessing Services. CCCTA provides demand-responsive public transportation to the service area already mentioned in Factor 1. There are three privately owned taxi services that operate in the county, but no other option for public transportation exists throughout Coshocton County. Persons accessing public transportation through CCCTA utilize the services for employment, adult day workshop, medical, educational, and daily living needs/social purposes. Many riders do not have any other means of transportation, and are truly transit dependent. As there have been no 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 social service and partnering agencies, 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 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.

Accessing Available Resources. To date, CCCTA has not encountered any individuals with LEP. However, CCCTA does provide transportation services to an individual with a hearing impairment. The manner in which encounters with hearing impaired persons have been managed is by using other family members who can help communicate with hearing impaired individuals or the hearing-impaired person has utilized written messages to accomplish the use of CCCTA services. Said individual is able to read lips, which makes 2-way communication easier. Additionally, CCCTA serves one individual who is non-verbal. Again, CCCTA utilizes the assistance of family members/home health aides as well as written messages or messaging by texting to serve this individual.

Additional Services needed to Provide Meaningful Access. Although it is not likely that there will be very many 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 CCCTA services. Clients having limited English proficiency will not experience a delay or denial of service.

The summary below discusses the low-cost methods the CCCTA 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 <i>(including a description of the LEP population(s) served)</i>
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Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered.

The CCCTA's staff reviewed the latest U.S. Census Bureau data reports (either the decennial Census or the American Community Survey) and determined that 1,285(3.7%) persons in Coshocton County speak English less than very well. No individual language met the Safe Harbor thresh old of 5% of the population or 1,000 people.

Coshocton County – Languages Spoke at Home

	Total Number	Percent of Population	Total Population of County
Speak Language other than English	3,103	9.56%	36,629
Speak English Less than Very Well	1,285	3.7%	36,629
Spanish	206	.6%	36,629
Asian and Pacific Islander Languages	68	.2%	36,629
Other Language	1	0%	36,629
Other Indo-European (multiple Lang)	2,828	8.57%	36,629

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

The CCCTA assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. The CCCTA provides approximately 19,350 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 CCCTA's programs are important; however, those related to safety, public transit, nondiscrimination and public involvement are among the most important. The CCCTA 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 CCCTA will strive to provide alternative but meaningfully accessibility. Moreover, the CCCTA 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 CCCTA makes every effort to make its programs, services, and activities, accessible to LEP individuals. The CCCTA 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 CCCTA 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 CCCTA has developed partnerships with local agencies, organizations, law enforcement, local school districts and social service agencies that are available to assist with it LEP responsibilities.
- c) Should CCCTA not be able to fulfill a request for an interpreter through its partnering agencies, it will contract for translation/interpretation services with Certified Language International (CLI) this service offers 231 different language translation/interpretation at the touch of a phone 24 hour a day. There is a one-time sign-up Charge of \$500. The cost is then \$1.65 per minute when an interpreter is used.

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 CCCTAs language assistance measures, The CCCTA 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

The CCCTA 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 CCCTA 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 CCCTA’s financial resources are sufficient to fund language assistance resources needed.
- Determine whether CCCTA has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning CCCTA’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 CCCTA staff:

- Information on the CCCTA’s 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.
- Employees will be trained upon hire and annually during employee in-service

Limited English Proficient (LEP) Resource Materials:

LEP Policy

The CCCTA 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 the Area Agency on Aging Region 9, Inc. at (800)932-7277 and with the Coshocton County Job & Family Services for complete and accurate translation services. CCCTA also is in discussion with local school districts to inquire about the possibility of identifying translators who could be available on an emergency basis should immediate translation services be required. Should CCCTA not be able to fulfill a request for an interpreter through its partnering agencies, it will contract for translation/interpretation services with Certified Language International (CLI) this service offers 231 different language translation/interpretation at the touch of a phone 24 hour a day. The agency will also utilize web-based translator programs if available.

If you need help with English, please call (740)622-7139.

Si usted necesita ayuda con el inglés, por favor llame (740)622-7139

***“I Speak”* Language Identification Card**

Mark this Box if you speak...	Language Identification Chart	Language
<input type="checkbox"/>	Mark this box if you read or speak English	English
<input type="checkbox"/>	Marque esta casilla si lee o habla español	Spanish
<input type="checkbox"/>	Kos lub voj no yog koj paub twm thiab hais lus Hmoob	Hmong
<input type="checkbox"/>	如果说中国在方框内打勾	Chinese
<input type="checkbox"/>	Xin ñaùnh daáu vaøo oâ naøy neáu quyù vò bieát ñoïc vaø noùi ñöôïc Vieät Ngöô.	Vietnamese
<input type="checkbox"/>	당신이한국어말할경우이 상자를표시	Korean
<input type="checkbox"/>	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	Tagalog
<input type="checkbox"/>	Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen	German
<input type="checkbox"/>	Отметить этот флажок, если вы говорите по-русски	Russian
<input type="checkbox"/>	Означите ову кућицу ако говорите српски	Serbian
<input type="checkbox"/>	आप हिंदी बोलते हैं तो इस बक्से को चिह्नित करें	Hindi
<input type="checkbox"/>	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 (if available)	Name and Phone Number of Individual (if available)	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	96.9%	1%	1.1%	.3%	.2	1.3%
CCCTA Transportation Advisory Board	100%					

B. Efforts to Encourage Minority Participation

To encourage participation on its boards, committees and councils, the CCCTA will make every effort to encourage minority participation on the boards. CCCTA is actively recruiting new members and will update the table when able.

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)

Insert Agency Name monitors subrecipients using the following process:

1. Insert Agency Name uses the following process for ensuring all subrecipients are complying with the general reporting requirements of FTA Circular 4702.1B: (document the process here)
2. Insert Agency Name 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 Title VI 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
Comments:	

COMMISSIONER'S JOURNAL

Wednesday**Regular****April 15, 2020**

The Coshocton County Commissioners met in Regular session on Wednesday, April 15, 2020 with Mr. Gary L. Fischer, Mr. Dane R. Shryock and Mr. D. Curtis Lee. Also in attendance Mrs. Mary Beck, Administrator/Clerk.

Approve Minutes

Mr. Shryock made a motion, seconded by Mr. Lee to approve the minutes of the Wednesday, April 8, 2020 meeting as presented.

Vote:	Fischer	yea
	Shryock	yea
	Lee	yea

Court Square

Mr. Lee made a motion, seconded by Mr. Shryock granting permission to the Veterans Service Commission the use of the Court Square on Monday, May 25, 2020 for the Annual Memorial Day Parade and Services from 8 am to 12 pm.

Vote:	Fischer	yea
	Shryock	yea
	Lee	yea

CCCTA – Title VI Plan

Mr. Shryock made a motion, seconded by Mr. Lee to approve the Coshocton County Coordinated Transportations (CCCTA) Title VI Plan as requested by Ms. Valerie Shaw, CCCTA Director.

Vote:	Fischer	yea
	Shryock	yea
	Lee	yea

Resolution 2020-028

Mr. Lee made a motion, seconded by Mr. Shryock to sign Resolution 2020-028, a temporary resolution defining the payment of sick leave during the COVID-19 Pandemic for Coshocton County Emergency Medical Services.

Vote:	Fischer	yea
	Shryock	yea
	Lee	yea

Resolution 2020-029

Mr. Shryock made a motion, seconded by Mr. Lee to sign Resolution 2020-029 permitting the payment of Hazard Duty Incentive Pay during the COVID -19 Pandemic for Coshocton County Emergency Medical Services.

Vote:	Fischer	yea
	Shryock	yea
	Lee	yea

Resolution 2020-030

Mr. Lee made a motion, seconded by Mr. Shryock to sign Resolution 2020-30 a resolution authorizing the use of credit cards and establishing the policies regarding the use of credit cards for the Coshocton County Emergency Medical Services.

Vote:	Fischer	yea
	Shryock	yea
	Lee	yea

COMMISSIONER'S JOURNAL

Wednesday

Regular

April 15, 2020

Assistant Chief Rickard Cosmar – Temporary Full-time

Mr. Shryock made a motion, seconded by Mr. Lee to move Assistant Chief Rickard Cosmar, Coshocton County EMS to temporary full-time status for the period March 14, 2020 through June 5, 2020 for the COVID-19 Pandemic Response.

Vote:	Fischer	yea
	Shryock	yea
	Lee	yea

Resignation – Kristen E. Warner

Mr. Lee made a motion, seconded by Mr. Shryock to accept the resignation of Ms. Kristen E. Warner from the Coshocton County Emergency Medical Services effective April 13, 2020.

Vote:	Fischer	yea
	Shryock	yea
	Lee	yea

Transfers/Additional/Reductions

Mr. Lee made a motion, seconded by Mr. Shryock to approve the following Transfers/Additional/Reductions which have been certified by the County Auditor.

TO	Transfer – Common Pleas Ct.	FROM	AMOUNT
001-0222-521.00 Equipment		001-0222-5102.00 Salaries	\$3,200.00
	Additional – REA		
040-0100-5260.00 Contracts		Unappropriated Fund Balance	\$32,000.00
	Transfer – Auditor		
001-0120-5260.00 Cont. Serv.		Unappropriated Fund Balance	\$1,300.00
	Additional – Hopewell		
080-0100-5260.03 Cont. Serv.		Unappropriated Fund Balance	\$118,000.00
	Additional – Common Pleas Ct.		
001-0227-5210.01 Equip. Rem.Tec		Unappropriated Fund Balance	\$5,855.00

Vote:	Fischer	yea
	Shryock	yea
	Lee	yea

Then and Now Certificates

Mr. Shryock made a motion, seconded by Mr. Lee to approve the following Then and Now Certificates which have been certified by the County Auditor.

VENDOR	ACCOUNT NUMBER	AMOUNT	DEPARTMENT
Med. Priority Consultants	100-0100-5400.00	\$2,550.00	911
Probate & Juvenile Court	380-0100-5262.00	\$4,165.67	DJFS
Allwell Behav. Health Choic.	211-0400-5260.00	\$3,650.00	Juv/Prob. Ct
Cosh. Co. DJFS	090-0100-5400.00	\$50,000.00	DJFS

Vote:	Fischer	yea
	Shryock	yea
	Lee	yea

COMMISSIONER'S JOURNAL

Wednesday

Regular

April 15, 2020

Bylaw Private Road Subdivision

Mr. Shryock made a motion, seconded by Mr. Lee to sign the Bylaw Private Road Subdivision. The creation of a 1 – lot private road subdivision located on CR 5 in Oxford Township on property owned by Marsha Ann Bylaw, Auditor's Parcel Number 029000034800.

Vote:	Fischer	yea
	Shryock	yea
	Lee	yea

Dog Wardens Report

Received the Dog Wardens Report for the week ending April 13, 2020 with 4 dogs picked up by the warden, 2 dogs euthanized, 9 dog licenses sold, 8 dogs sold, 3 dogs redeemed, 6 dogs per owner surrender, \$15.00 in boarding fees collected, 13 citations issued, 30 calls handled for a total of \$393.00 in fees collected.

Monthly Mortgage Report

Received the Monthly Mortgage Report for the month of March 2020 from Mrs. Susan Turner, Coshocton County Recorder.

Executive Session – Opioid Litigation

At 9:00 a.m. Mr. Lee made a motion, seconded by Mr. Shryock to go into executive session to receive an opioid litigation update. All vote aye. At 9:10 a.m. Mr. Fischer returned the meeting to regular session.

December Interest Statement

Mr. Shryock made a motion, seconded by Mr. Lee to receive and review the December 2019 Interest Statement as submitted by Mrs. Janette Donaker, Coshocton County Treasurer.

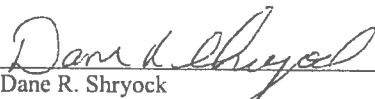
Vote:	Fischer	yea
	Shryock	yea
	Lee	yea

Adjourn


At 1:00 p.m., Mr. Fischer adjourned the meeting.



Gary L. Fischer



Dane R. Shryock



D. Curtis Lee



Administrator/Clerk