

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

Coshocton Public Transit (CPT)

July 24, 2023

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

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Section 1: Title VI Plan Approval

Title VI Plan
Adopted on: July 24, 2023

Adopted by: Coshocton County Board of Commissioners

Signature(s): *Meeting minutes of approval included at the end of this plan.

Annual Certifications and Assurances

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with Title VI regulations. This requirement shall be fulfilled when the applicant/recipient submits its annual certifications and assurances. Primary recipients will collect Title VI assurances from sub-recipients prior to passing through FTA funds.

CPT will remain in compliance with this requirement by annual submission of certifications and assurances as required by ODOT.

The date of last submission of these certifications and assurances (at the time of this Plan's approval) is: July 24, 2023.

Title VI Plan Revision Log

Date Month/day/year	Section Revised	Summary of Revisions
4/15/2020		Original Plan Approval
7/24/2023		Plan Update Approval

Section 2: Title VI Policy Statement

Policy Statement

The Coshocton Public Transit, 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 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.

Section 3: Notice to the Public

Title VI Notice to the Public

The Coshocton Public Transit's Notice to the Public is as follows:

Notifying the Public of Rights Under Title VI

Coshocton Public Transit (CPT)

- The Coshocton 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 Coshocton Public Transit.
- For more information on the Coshocton Public Transit's civil rights program, the procedures to file a complaint, or to file a complaint, please contact Brooke Alverson, Administrator/Clerk Board of Commissioners at (740)622-1753, (TTY 1-800-750-0750); email brookealverson@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 Public Transit's** Notice to the Public is posted in the public areas of the offices located at:

1. 401 Main Street, Coshocton, OH 43812
2. 401 ½ Main Street, Coshocton, OH 43812
3. 349 Main Street, Coshocton, OH 43812; and Inside CPT Vehicles.

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 Public Transit 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 Public Transit.
- Para obtener más información sobre el programa de derechos civiles de Coshocton Public Transit, o para obtener más información sobre los procedimientos para presentar una queja, por favor llame a Brooke Alverson, Administrator/Clerk Board of Commissioners at (740)622-1753, (TTY 1-800-750-0750); email brookealverson@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.

The Coshocton Public Transit'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 Public Transit may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form to Brooke Alverson, 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 Brooke Alverson, 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, Brooke Alverson, 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.

Brooke Alverson, 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/they 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/they have 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 Public Transit'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):					
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin					
Date of Alleged Discrimination (Month, Day, Year) _____					
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of 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:

Brook Alverson, 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 Public Transit** 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 Coshocton Public Transit 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 Public Transit 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 Public Transit Staffer(s)	Activity	Communication Method (Public Notice, Posters, Social Media)	Notes
2020		Coshocton Beacon	Weekly Ads	Free county wide distribution through USPS
2020	Valerie & Tracy	Public Survey	Online survey in conjunction with OMEGA and paper surveys at public events, in office & on shuttles, Beacon publication	To assist with 2020 re-write of the LDTP and to help structure 5311 Public Transportation
6-11-20	Valerie & Tracy	Transportation Advisory Board Meeting	Virtually due to Covid	Open to public
9-17-20	Valerie & Tracy	Transportation Advisory Board Meeting	Virtually due to Covid	Open to public
10-29-20	Valerie & Tracy	Radio Spot	WTNS radio talk show	Open to public
12-17-20	Valerie & Tracy	Transportation Advisory Board Meeting	Virtually due to Covid	Open to public

2021		Coshocton Beacon	Weekly Ads	Free county wide distribution through USPS
2021	Valerie & Tracy	Public Survey	Online survey in conjunction with OMEGA and paper surveys at public events, in office & on shuttles, Beacon publication	To assist with 2020 re-write of the LDTP and to help structure 5311 Public Transportation
1-21-21	Valerie & Tracy	Chamber of Commerce Meeting	Virtually due to Covid	Open to public
3-18-21	Valerie & Tracy	Transportation Advisory Board Meeting	Virtually due to Covid	Open to public
6-15-21	Valerie & Tracy	Transportation Advisory Board Meeting	Virtually due to Covid	Open to public
7-29-21	Valerie & Tracy	Chamber of Commerce Meeting	Virtually due to Covid	Open to public
8-6-21	Valerie & Tracy	First Farm Friday	In-person table on Main Street	Open to public
8-18-21	Valerie & Tracy	Job Fair	In-person at the Elks sponsored by Ohio Means Jobs/CCDJFS	Open to public
9-9-21	Valerie & Tracy	Transportation Advisory Board Meeting	Virtually due to Covid	Open to public
9-23-21	Valerie & Tracy	Transportation Advisory Board Meeting/LDTP	Virtually due to Covid	Open to public
11-28-21	Valerie & Tracy	Warsaw Christmas Parade	Walked next to CPT shuttle and handed out informational packets	Open to public
12-16-21	Valerie & Tracy	Transportation Advisory Board Meeting	Virtually due to Covid	Open to public
2022		Coshocton Beacon	Weekly Ads	Free county wide distribution through USPS
2022	Valerie & Tracy	Public Survey	Online survey in conjunction with OMEGA and paper surveys at public events, in office & on shuttles, Beacon publication	To assist with 2020 re-write of the LDTP and to help structure 5311 Public Transportation
1-10-22	Tracy	Radio spot	WTNS Radio Talk Show	Open to public

1-12-22	Tracy	Public Meeting	In Person @ Frontier Power	Open to public
1-13-22	Valerie & Tracy	West Lafayette Methodist Church Ladies Group	In person. Spoke about programs and provided swag bags.	Group Members
1-27-22	Valerie & Tracy	Chamber of Commerce Meeting	In Person	Open to public
1-21-22	Valerie & Tracy	Handicapped Society Meeting	In Person	Open to public
3-10-22	Valerie & Tracy	Transportation Advisory Board Meeting	In Person	Open to public
3-21-22	Valerie & Tracy	WTNS Radio	In person radio spot	Public
4-18-22	Valerie & Tracy	Handicapped Society Meeting	In Person	Open to public
6-16-22	Valerie & Tracy	Transportation Advisory Board Meeting	In Person	Open to public
6-17-22	Valerie & Tracy	Windsorwood Senior Living	In Person Presentation	Residents and staff of Windsorwood
8-9-22	Tracy	Riverside Towers Senior/Disabled	In Person Presentation	Residents and Staff
9-6-22	Valerie & Tracy	Seton Senior Living	In Person Presentation	Residents and Staff
9-15-22	Valerie & Tracy	Transportation Advisory Board Meeting	In Person	Open to public
9-30-22 through 10-6-22	Valerie & Tracy	Coshocton County Fair	In Person Booth	Open to public
10-17-22	Valerie & Tracy	50+ Expo	In Person Table	Open to public
10-18-22	Valerie & Tracy	Genusian Club at RW Ele.	In Person Speaking Engagement	Club Members
10-27-22	Valerie & Tracy	Coshocton Senior Center	In Person Speaking Engagement	Open to public
11-27-22	Valerie & Tracy	Warsaw Christmas Parade	In Person	Open to public
12-3-22	CPT Staff/Drivers	West Lafayette Christmas Parade	In Person	Open to public
12-15-22	Valerie & Tracy	Transportation Advisory Board Meeting	In Person	Open to public
2023		Coshocton Beacon	Weekly Ads	Free county wide distribution through USPS

2023	Valerie & Tracy	Public Survey	Online survey in conjunction with OMEGA and paper surveys at public events, in office & on shuttles, Beacon publication	To assist with 2020 re-write of the LDTP and to help structure 5311 Public Transportation
1-24-23	Valerie & Tracy	Coshocton Regional Health Equity Committee	In Person	CRMC Staff, Doctors & Administration
2-20-23	Tracy	Handicapped Society Meeting	In Person	Open to public
3-11-23	Valerie & Tracy	Health & Wellness Expo	In Person Table	Open to public
3-15-23	Valerie & Angie	DD Luncheon	In Person Guest Speaker	Open to public
3-17-23	Valerie & Tracy	Transportation Advisory Board Meeting	In Person	Open to public
3-20-23	Tracy	Handicapped Society Meeting	In Person	Open to public
3-27-23	Valerie & Tracy	Personal Care Attendant Meeting	In Person	COAD, OMEGA, Volunteers and MM's from Muskingum & Guernsey
4-11-23	Valerie	Genesis Hospital	In Person	Genesis staff
4-17-23	Valerie & Tracy	Handicapped Society Meeting	In Person	Open to public
4-27-23	Valerie & Tracy	Chamber of Commerce Meeting	In Person	Open to public
5-3-23	Valerie	CCBDD Carnival	In Person Table	Open to public
6-15-23	Valerie & Tracy	Transportation Advisory Board Meeting	In Person	Open to public
6-21-23	Tracy	WTNS Radio	In person radio spot	Public
	Valerie & Tracy	Social Media & Web Sites	We frequently post on our social media pages and websites	Public

Section 8: Language Assistance Plan

Plan Components

The Coshocton Public Transit'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 A 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.

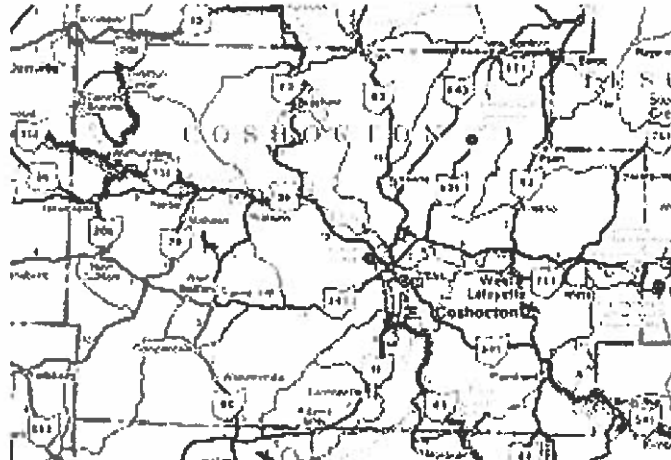
Four Factor Analysis Methodology

To determine if an individual is entitled to language assistance and what specific services are appropriate, the Coshocton Public Transit 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 Public Transit 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 CPT's Service Area. Coshocton County's Coordinated Public Transit services.



Analysis of U.S. Census Data. Data from the U.S. Census Bureau's 2019 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 2019, the population (5 years and over) in Coshocton County was 34,272. 91% or 31,325 (based on ages 5+) of Coshocton County, Ohio residents speak only English, while 8.6% or 2,947 individuals speak other languages. The non-English language spoken by the largest group is German, which is spoken by 2,555 individuals or 7.5% of the population. There are 227 individuals or .66%, which speak Spanish, 34 or .099% speak French, Haitian or Cajun, 2,555 or 7.45% speak German, 29 or .08% speak Russian, Polish or other Slavic languages, 29 or .08% speak Chinese, 17 or .05% speak Vietnamese, 28 or .08% speak Tagalog (incl. Filipino), 9 or .02% speak Asian and pacific Island languages, 19 or .05% speak other and unspecified languages.

https://data.census.gov/table?q=C16001&g=040XX00US39_050XX00US39031&tid=ACSDT5Y2019.C16001

Concentrations of LEP Persons within the CPT's Public Transit Service Area. The total percentage of "Linguistically Isolated Households" in Coshocton was unattainable. However, an estimated 2.5% or 870 Coshocton County residents 5 years and over speak English less than "very well". An estimated 8.6% or 2,947 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 Public Transit'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. To date, there have been no reports of anyone who uses CPT's service requesting the use of an interpreting service to make trip reservations or to correspond with the CPT office. Prior to 2008 CPT did provide services to an individual with a hearing impairment. The individual was able to communicate with the CPT office through the Relay Ohio Program. CPT currently serves two individuals who are non-verbal. Two-way communication is possible by texting with the individuals.

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

Accessing Services. CPT provides demand-responsive public transportation in the service area already mentioned in Factor 1. There is one privately owned taxi service that operates in the county however; no other option for public transportation exists in Coshocton County. Persons accessing public transportation through CPT 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, CPT has not encountered any individuals with LEP. However, CPT 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 said individuals or the hearing-impaired person uses written messages including texting to utilize the use of CPT services. Said individual is able to read lips, which makes 2-way communication easier. Additionally, CPT serves two individuals who are non-verbal. Again, CPT utilizes the assistance of family members/home health aides as well as written messages or messaging by

texting to serve this individual. The Ohio Relay Service is another option should the individuals choose to use the service.

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 CPT services. Clients having limited English proficiency will not experience a delay or denial of service.

The summary below discusses the low-cost methods the CPT 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 CPT's staff reviewed the latest U.S. Census Bureau data reports (either the decennial Census or the American Community Survey) and determined that 870(2.5%) persons in Coshocton County speak English less than very well. No individual language met the Safe Harbor threshold of 5% of the population or 1,000 people.

Coshocton County – Languages Spoke at Home

	Total Number	Percent of Population	Total Population of County (5+)
Speak Language other than English	2,947	8.6%	34,272
Speak English Less than Very Well	870	2.5%	34,272
Spanish	227	.6%	34,272
French, Haitian, or Cajun	34	.09%	34,272
German or West Germanic languages	2,555	7.5%	34,272
Rusian, Polish, or other Slavic languages	29	.08%	34,272
Chinese	29	.08%	34,272
Vietnamese	17	.05%	34,272
Tagalog (incl. Filipino)	28	.08%	34,272
Other Asian & Pacific Island languages	9	.03%	34,272
Other & unspecified languages	19	.05%	34,272

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

The CPT assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. The CPT provides approximately 19,709 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 CPT's programs are important; however, those related to safety, public transit, nondiscrimination and public involvement are among the most important. The CPT 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 CPT will strive to provide alternative but meaningfully accessibility. Moreover, the CPT 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 will be made available in other languages upon request.

CPT's programs and services are essential to many Coshocton County residents. The agency serves a large number of passengers who do not have alternative means of transportation to medical appointments, shopping and daily living needs appointments. While those living within city limits can walk or bike to some appointments, others who live in rural areas of the county are completely dependent upon CPT's service.

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

The CPT makes every effort to make its programs, services, and activities, accessible to LEP individuals. The CPT 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
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The CPT 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 are verified and distributed by the Director as need.
- b) The CPT 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 CPT 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 CPTs language assistance measures, The CPT 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 CPT 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 CPT 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 CPT's financial resources are sufficient to fund language assistance resources needed.
- Determine whether CPT has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning CPT'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 CPT staff:

- Information on the CPT'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, "I Speak" language cards, local collaborating agencies

The CPT 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. CPT 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 CPT 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 hours 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 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%
CPT Transportation Advisory Board	95%		5%			

B. Efforts to Encourage Minority Participation

To encourage participation on its boards, committees and councils, the CPT will make every effort to encourage minority participation on the boards. CPT 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

Monday

Regular

July 24, 2023

Community Room Agreement with CCCTA

Mr. Shryock made a motion, seconded by Mr. Conkle to grant permission to Coshocton County Coordinated Transportation Agency for use of the Coshocton County Commissioners Community Room on July 25, 2023 for a CORSA Defensive Drive Class.

Vote: Shryock	yea
Fischer	absent
Conkle	yea

Federal Transit Administration Title VI Program

Mr. Conkle made a motion, seconded by Mr. Shryock to approve the Federal Transit Administration Title VI Program for Coshocton County Coordinated Transportation Agency (CCCTA) as requested by Ms. Valerie Shaw, CCCTA Director.

Vote: Shryock	yea
Fischer	absent
Conkle	yea

Then and Now Certificates

Mr. Shryock made a motion, seconded by Mr. Conkle to approve the following Then and Now Certificate which has been certified by the County Auditor.

VENDOR	ACCOUNT	AMOUNT	DEPARTMENT
COSHOCTON COUNTY JOB & FAMILY SERVICES	090-0100-540001	\$99,666.06	DJFS

Vote: Shryock	yea
Fischer	absent
Conkle	yea

Transfers/Additional/Reductions

Mr. Conkle made a motion, seconded by Mr. Shryock to affirm the following Transfers/Additional/Reductions which were approved by County Administrator Mary Beck and Certified by the County Auditor.

TO ACCOUNT	FROM ACCOUNT	AMOUNT
001-0310-540000 (OTHER EXPENSE)	Transfer-BOE 001-0310-520000 (SUPPLIES)	\$350.00
001-1400-540000 (Other Expense)	Transfer-CCC 001-1400-520000 (Supplies)	\$50.00
353-0100-526000 (CONTRACT SERVICES)		

COMMISSIONER'S JOURNAL

Monday

Regular

July 24, 2023

The Coshocton County Commissioners met in regular session on Monday, July 24, 2023 at 8:30 a.m. with Mr. Dane Shryock and Mr. Rick Conkle. Also, in attendance was Mrs. Mary Beck, County Administrator, Mrs. Robin Schonauer, Budget Director and Mrs. Brooke Alverson, Clerk.

Approve Minutes

Mr. Shryock made a motion, seconded by Mr. Conkle to approve the minutes from the last meeting as presented.

Vote: Shryock	yea
Fischer	absent
Conkle	yea

Medical Office Lease with Prime Healthcare Foundation-Coshocton

Mr. Conkle made a motion, seconded by Mr. Shryock to sign the Medical Office Lease between Prime Healthcare Foundation-Coshocton, LLC, dba Coshocton Regional Medical Center and the Coshocton County Commissioners for a period of two (2) years commencing on August 1, 2023 for the location at 1523 Walnut Street, Suite 5 at rate of \$1,299.99 to be billed monthly to house the Resource Center for Juvenile-Probate Court, as requested by Mr. Douglas Schonauer, Court Administrator.

Vote: Shryock	yea
Fischer	absent
Conkle	yea

Resolution 2023-053

Mr. Shryock made a motion, seconded by Mr. Conkle to sign Resolution 2023-053, authorizing the filing on an application with the Ohio Department of Transportation by Coshocton County Board of Commissioners DBA Coshocton County Coordinated Transportation Agency for grants through the US DOT Federal Transit Administration (FTA) and the State of Ohio, as authorized under Federal Transit Laws and State of Ohio laws executing a contract with the Ohio Department of Transportation upon project approval.

Vote: Shryock	yea
Fischer	absent
Conkle	yea

COMMISSIONER'S JOURNAL

Monday

Regular

July 24, 2023

Report of Meetings Attended

On Thursday morning, July 20th Mr. Shryock attended the Airport Board Meeting and on Friday afternoon, July 21st Mr. Shryock attended a meeting with Mrs. Jillian Flowers, CDC of Ohio, Mr. John Cleek, CDC of Ohio, Mrs. Mary Beck, Coshocton County Project Manager, Mr. Eric Exley and Mr. Fred Williams, to discuss possible grant funding from CDC of Ohio, Targets of Opportunity Grant that would help aid in additional pickleball courts in Coshocton County.

Adjourn

Mr. Shryock adjourned the meeting at 12:00 p.m.


Dane R. Shryock
Rick Conkle
Clerk
Gary Fischer