



Safe, Reliable, and Accessible Public Transportation

2380 Bellbrook Avenue, Xenia, OH 45385

Phone: (937) 708-8322 E-mail: info@greenecats.org

Title VI Program

June 27, 2018

Notice to the Public

The Greene County Transit Board (GCTB) will list the following notification on the website, in the lobby of its administrative offices, and in the passenger guide which is provided to all registered riders and also available in all service vehicles including flex route buses:

The Greene County Transit Board, D.B.A. Greene CATS Public Transit, operates all services, routes and accommodations without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act of 1964. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Greene County Transit Board. For more information on the Greene County Transit Board civil rights program and the procedures to file a complaint, call (937) 708-8322; or email info@greenecats.org; or visit our website at www.co.greene.oh.us/greenecats; or visit the administrative office at 2380 Bellbrook Ave., Xenia, Ohio 45385.

A complainant may file a complaint directly with the Federal Transit Administration by completing a Title VI Complaint form and mailing it to the Office of Civil Rights, Attention: Title VI Program Coordinator, 1200 New Jersey Ave., SE, Washington, DC 20590.

Title VI Complaint Procedure

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the GCTB may file a Title VI complaint by completing and submitting the agency's Discrimination Complaint Form. The GCTB investigates complaints received no more than 180 days after the alleged incident. GCTB will process all fully completed and signed complaint forms.

Once the complaint form is received, the GCTB will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter within 30 days informing her/him whether the complaint will be investigated by our office. The GCTB will provide a complainant a status letter every 30 days until the closure letter is issued.

The GCTB has 45 days to investigate the complaint. If more information is needed to resolve the case, the GCTB may contact the complainant. The complainant has 30 days from the date of the contact 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 30 days, the GCTB will decide the case with the

information already received in the complaint. A case can be closed if the complainant withdraws their case.

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur. If the complainant wishes to appeal the decision, she/he has 30 days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

List of Investigations, Lawsuits and Complaints

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

There have been no Title VI investigations, complaints, or lawsuits since the Greene County Transit Board's last submission in 2015.

Public Participation Plan

The GCTB shall solicit public input for its Program of Projects annually as well as needed for other general matters such as the Language Assistance Plan, raising fares, or carrying out a major service change or reduction using variety of means to communicate to the public these and other proposed activities. Notices will include how the public can obtain information and make comments, where meetings are to take place, and other applicable information. The notices for public input will be posted 30 days in advance so the public has time to consider proposals and make comments. The notice methods include:

1. Press releases to local media
2. Newsletter (print and e-mail)
3. Website links and articles
4. On vehicles advertising with fliers
5. Posting of fliers at social service agencies

The GCTB meets with the public in locations that have convenient access to transit and are centrally located so that anyone in its service area can attend meetings and receive information about the GCTB activities that will impact them. Meetings are held at different times of the day in coordination with route schedules for easier access. All public meeting locations will be accessible to those with disabilities. If notified five (5) days prior to the meeting, language or hearing interpreters will be made available.

The GCTB staff will accept written comments and record oral comments if needed. Meetings will have sign-up sheets available and if no one is in attendance, staff will wait 30 minutes and then announce the reason for the meeting, a statement that no one is in attendance and close the meeting. The public are also able to submit comments by letter or e-mail until the time of the public hearing is scheduled to end. Public comments are presented to the appropriate Transit Board committee as part of the decision making process.

On November 8, 2016 the GCTB held a public input meeting to receive comments on proposed revisions to its Flex Routes to add evening and weekend service, eliminate transfer fees and increase the cost of monthly passes. Written comment was also accepted until November 22, 2018. In addition, the Mobility Manager and Executive Director attended community coordinating committees informing members of proposed changes and seeking their input.

Language Assistance Plan

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

The GCTB will keep a running log of requests for language assistance to monitor the need of language assistant. Also, every ten years the GCTB will assess the magnitude and nature of any significantly large groups of people with Limited English Proficiency,

and any problems that they may have, due to such proficiency limits, of obtaining information about and using the GCTB public transit services. The GCTB will use relevant local, State and Federal demographic data to locate and quantify the number of people, within Greene County, that have limited English proficiency. Significant concentrations or numbers of identified persons or locations will be identified, if any do exist. The language(s) spoken will be identified.

Four-Factor Analysis 2018

Factor 1: The number and proportion of LEP persons served or encounter in the eligible Service Population:

A. Geographical Boundaries of the GCTB service area: Greene County, Ohio

B. Analysis of U.S. Census Data*: According the 2010 US Census Bureau* the total population in Greene County was 161,573. Of the persons five years of age or older (150,963), 142,207 of them (94.2%) speak English only. The next categories that show significant language usage other than English are the population of Spanish speaking persons (2,889 - 1.9%), Other Indo-European language speakers (3,292 - 2.2%), Asian and Pacific Island language speakers (2,019 – 1.3%). The percent of specified language speakers that indicated that they speak English less than very well were; Spanish 22.8%, Other Indo-European 16.8%, Asian and Pacific Island 32.9%. By observation, of the Asian and Pacific Island language speakers are a small cluster of Vietnamese living in one of the counties small cities. Also, according to the Wright State University Center for International Education approximately 150 international students are attending their University. * <http://quickfacts.census.gov>; <http://factfinder2.census.gov>

C. Concentrations of LEP Persons with the GCTB service area: The total percentage of individuals (approximately 1,875) age five or older in Greene County that indicated that they speak English less than very well is 1.2% indicating that the GCTB service area is populated by a small LEP population.

Factor 2: The frequency with which individuals with Limited English Proficiency come in contact with GCTB services:

A. GCTB prior experiences with LEP individuals: From 2015 to 2017 there have been no individuals that sought the use of GCTB services that did not speak English.

Factor 3: The importance of GCTB Services to LEP persons:

A. Accessing Services: GCTB provides traditional demand responsive service and flex routes that circulate and connect neighboring communities and the adjoining transit systems in Greene and Montgomery County. The service provides rides to individuals with developmental and physical disabilities to adult day services and work, students who attend local universities, and Medicaid eligible and elderly individuals for medical appointments. The general public also uses the service to access local social service agencies, retail stores, medical appointments, and work.

Most of our riders are transportation disadvantaged due to intellectual or physical disabilities requiring specialized transportation, are elderly or cannot afford to operate their own vehicle. Other transportation options in Greene County are limited to private non-profit or public senior centers and adult day service providers with limited number of vehicle serving specific populations and two private cab companies. Since we have had no encounters with LEP persons in the past three years we can only assume that those individuals that are identified as an LEP person would most likely have similar reasons as listed above for using public transportation. Working with local human services agencies and participating in coordinating committees we continue to work to identify LEP populations and how we may better serve those individuals through outreach efforts.

Factor 4: The Resources Available to the Recipient and Costs:

- 1. Assessing Services:** Currently the GCTB employees are instructed to refer language assistant requests to the Mobility Manager. The Mobility Manager will maintain a current listing of collaborative partners that can assist in communicating with Limited English Proficient individuals and develop language specific materials. The Mobility Manager has established working relationships with local community social service agencies including the International Student Department at Wright State University through which we are working to communicate with international students. In addition, a local Vietnamese church and community service project volunteers have been identified to communicate with the Vietnamese community. There is also a feature on the GCTB website that allows individuals to translate and view all content into their language. There is no charge for these services.
- 2. Additional Services needed to provide meaningful access:** The GCTB Mobility Manager is working on developing computer applications that can assist schedulers to better communicate with individuals who have LEP.
- 3. Accessing Budgetary Constraints:** the GCTB will continue to look for low cost ways to improve the accessibility of our services through the community collaborations, computer operations, and limited copies of printed material since the number of LEP individuals in Greene Count is such a small portion of the population.

Membership of non-elected Committees

Body	White	Black	Asian	Hispanic
Population	86.7%	7.3%	3.0%	2.6%
Transit Board	86%	0%	0%	14%
Finance Committee	86%	0%	0%	14%
Personnel Committee	100%	0%	0%	0%
Programs Committee	100%	0%	0%	0%

The GCTB seeks to include members on its committees that are representative of the various communities and populations of Greene County and can provide the expertise needed to advise the Transit Board. Members are recruited through social service agencies, community organizations, and public institutions that include minority professionals and provide service to minorities, private businesses and the public at

large. In addition, both Staff and Board members personally contact potential Board and Committee members including minority candidates.

Subrecipient Monitoring

The GCTB has no Subrecipients that receive Federal financial assistance therefore the monitoring requirements are not applicable.

Facility Equity Analysis

The GCTB has not constructed a facility therefore the requirement to provide a Title VI Equity Analysis is not applicable.

Fixed Route Service Standards and Policies

The GCTB does not operate Fixed Route Service therefore additional information required is not applicable.