

Warren County Transit Service

Title VI – Overview

1. Notice to the Public

To make riders aware of its commitment to Title VI compliance, and of their right to file a civil rights complaint, WCTS has presented the following language, in both English and Spanish, on its website www.co.warren.oh.us/transit/ and on posters in the lobby of the reception area of its administration offices.

Your Civil Rights

Warren County Transit Service (WCTS) 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 they have been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with WCTS. For more information on WCTS's civil rights program and the procedures to file a complaint, please contact 513-695-1210; email masosu@co.warren.oh.us or visit our administrative office at 406 Justice Drive, Lebanon, OH 45036 from 8:00 am to 4:00 pm Monday through Friday. For more information about WCTS programs and services, visit www.co.warren.oh.us/transit/. If information is needed in another language, please contact 1-877-862-1302.

2. Discrimination Complaint Procedures

WCTS has established a process for riders to file a complaint under Title VI. Any person who believes that she or he has been discriminated against on the basis of race, color, or national origin by WCTS may file a Title VI complaint by completing and submitting the agency's Title VI Complaint available at our administrative offices or on our website www.co.warren.oh.us/transit/.

WCTS will investigate complaints up to 180 days after the alleged incident. WCTS will process complaints that are complete. Once the complaint is received, WCTS will review it and the complainant will receive an acknowledgement letter informing them whether the complaint will be investigated by WCTS.

WCTS has up to 30 days to investigate the complaint. If more information is needed to resolve the case, the WCTS may contact the complainant. The complainant has thirty days from the date of the letter to send requested information to the investigator assigned to the case.

If WCTS's investigator is not contacted by the complainant or does not receive the additional information within 30 days, WCTS can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue the case.

After the investigator reviews the complaint, one of two letters will be issued to the complainant: A closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.

A LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur. If the complainant wishes to appeal the decision, she/he has ten 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:

Federal Transit Administration
Office of Civil Rights
1200 New Jersey Avenue SE
Washington, DC 20590.

3. **Active Lawsuits, Complaints or Inquiries Alleging Discrimination**

WCTS maintains a list of active investigations conducted by FTA and entities other than FTA, including lawsuits and complaints naming WCTS that allege discrimination on the basis of race, color or national origin. This list includes the date that the transit-related Title VI investigation, lawsuit or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit or complaint; and actions taken by WCTS in response, or final findings related to the investigation, lawsuit, or complaint.

As of the time of this writing, no complaints regarding discrimination on the grounds of race, color or national origin have been issued.

4. **Public Participation Plan**

INTRODUCTION

Warren County Transit System (WCTS) is an on-demand curb-to-curb system that operates anywhere in Warren County. Passengers should schedule trips at least a day in advance by calling dispatch. The program is funded, in part, by state and federal funds. Fare is \$3 one way for trips within the county and service to several out-of-district locations in Dayton, West Chester and Middletown. Discounted fare is available to elderly and disabled.

PURPOSE

This Plan has been created to comply with Title VI, 4702.1B Circular requirements. This plan includes an outreach plan to engage minority and limited English proficient (LEP) populations, a summary of outreach efforts to LEP and underserved populations.

OUTREACH TO MINORITY & LEP POPULATION

WCTS has an LEP Plan which outlines methods used to reach out to the LEP population. According to the 2022 census, 9.3% of the population has another language other than English spoken at home.ⁱ The most common language after English is Asian and Pacific Island languages (4.8%), Other Indo-European languages (3%) and Spanish (1.9%).ⁱⁱ No discernable concentrations of persons with limited English proficiency were noted in Warren County.

However, WCTS is dedicated to providing service all any resident seeking transportation, including LEP persons.

Translation services are provided by Language Line Services, 1 Lower Ragsdale Drive, Monterey, California 93940, Phone number 1-877-862-1302. Vendor was chosen because the company can offer the services that we need on an “as-needed” basis; 24 hours a day, 7 days a week. Language Line provides over-the-phone interpreting for over 170 languages.

Brochures about WCTS are available in Spanish as well as a large-print edition.

Statistical information about minority groups has been obtained from the 2020 Census. That information follows:

White persons	86.9%
Asian persons	6.9%
Black persons	3.9%
Persons reporting two or more races	2.0%
Persons of Hispanic or Latino Origin	3.2%

WCTS does not discriminate or refuse service to anyone based on race.

SUMMARY OF OUTREACH EFFORTS

WCTS has made efforts to communicate with LEP individuals. These efforts are outlined in the LEP Plan. They include instructing dispatch workers and drivers to encourage passengers to use the translation service line and providing Spanish brochures.

To better serve elderly and disabled passengers, WCTS offers discounted fare for qualifying individuals.

ENCOURAGEMENT OF CITIZEN PARTICIPATION

Citizens are encouraged to participate in all aspects related to the planning and implementation of the WCTS, from its residents with low- and moderate-incomes, minority, non- and limited-English proficient speaking residents as well as persons with disabilities residing in Warren County.

The County also encourages local government, social service and community agencies, to participate in planning and implementation activities as well. In order to achieve this objective, WCTS has engaged representation on the Transit Advisory Committee (TAC) from various agencies serving populations that are often of low-moderate income levels, serve a diverse base of clientele or have special needs, such as the Director of Job and Family Services and the Board of Developmental Disabilities.

CITIZEN COMMENTARY

Residents are provided with a public comment period for grant applications and any other documents or plans requiring specified public review and comment periods. Review is advertised in Today's Pulse Journal which services the entire county. All documents are public and are available in the Grants Administration Office, located at 406 Justice Drive, Lebanon, Ohio 45036. Furthermore, documents will be mailed or emailed to anyone upon request.

PUBLIC HEARINGS

Public hearings will be held to obtain citizens' views and to respond to proposals and questions. Said hearing is to be held before the proposed application is published for comment.

All public hearings will be held in the County Administrative Building. The building, located at 406 Justice Drive, Lebanon, Ohio 45036 is handicap accessible. All public hearings will be advertised in the local newspaper, Today's Pulse not less than 30 calendar days before the scheduled public hearing. All advertisements published will be placed in easily readable type in the non-legal section of the newspaper. Each advertisement will state the date, time and place of the public hearing. All public hearings will be held in locations providing complete handicap accessibility and in locations centrally located in the community to provide easy access to all residents. All public hearings will begin and be completed within timeframes when WCTS is in operation, making the hearing more accessible to persons who might be potential or actual beneficiaries.

As already noted, the County does not have high concentrations of non-English speaking persons. However, the County will make every effort to encourage participation at all public hearings by non-English speaking persons by providing interpretation and translation if requested in advance. The cost of such services will be paid for by the County using local or transit funds and will not be passed along to those persons being assisted.

MEETINGS

Citizens are encouraged to attend any scheduled meetings (including Transit Advisory Committee meetings.) Notices will be posted at least 7 calendar days in advance of said meetings on the local newspaper, Today's Pulse's electronic Press Release page. All notices will state the date, time and place of the meeting.

Public hearings will be held in the County Administrative Building in Lebanon, Ohio. Public hearings will also be held during those times when WCTS is in operation, which provides a greater likelihood that participation is all inclusive.

AVAILABILITY TO THE PUBLIC

All public documents related to the WCTS will be available to the public upon request. This includes the availability of materials in a format accessible to persons with disabilities. Requests may be made to the Grants Department, located at the County Administration Building, 406 Justice Drive, Lebanon, Ohio 45036 during normal business hours on Monday through Friday from 8:00 a.m. until 4:30 p.m. (except during City holidays).

ACCESS TO RECORDS

All public records, documents and reports pertaining to the WCTS are kept in the offices of the Grants Department, 406 Justice Drive, Lebanon, Ohio 45036. (Phone: 513-695-1259; Fax: 513-695-1280). Documents will be made available to the public upon request during regular business hours as stated above. Records will be retained in accordance with applicable Public Record Retention laws, but in no case for a period less than three years. Hard copies will be available for purchase at the current per-page rate as established by the Finance Department.

COMMENTS/COMPLAINTS

Complaints or comments regarding WCTS may be made to the Grants Administrative Manager by calling 513-695-1210 or emailing masosu@co.warren.oh.us. Technical assistance will be provided to any persons requesting such assistance in developing complaints or comments as an accommodation.

The County will provide a timely and substantial response within 15 calendar days to any complaints received regarding the operation or implementation of the WCTS or any aspect related to it. In most cases, responses will be made in the same manner in which the comment/complaint was made (verbal or written).

PERSONS WITH DISABILITIES

Public hearings and community meetings will be held in locations accessible to persons with restricted mobility. All public hearings will be held at times when the WCTS is in operation. The WCTS is the local public transit system. Its vehicles are accessible to persons with disabilities. Upon request, copies of all written materials are available in alternative formats.

COUNTY COMMISSIONER REPRESENTATION

Whereas the Transit Advisory Committee (TAC) advises on matters related to the operations of the WCTS and affiliated grant implementation, the Board of County Commissioners is the governing body for the WCTS. In an effort to ensure information from TAC meetings is communicated adequately to the Commissioners, the Grants Administration Manager will serve as a liaison.

County Commissioners generally meet every Tuesday and Thursday at the County Administrative Building, 406 Justice Drive, Lebanon, Ohio 45036. Meeting schedules are posted on the County website and agendas are posted in the Commissioners office.

5. Limited English Proficiency Plain

Factor 1 – Number of LEP Persons in Service Area

WCTS has an LEP Plan which outlines methods used to reach out to the LEP population According to the 2020 census, 9.3% of the population has another language other than English spoken at home. The most common language after English is Asian and Pacific Island languages (4.8%), Other Indo-European languages (3%) and Spanish (1.9%). No discernable concentrations of persons with limited English proficiency were noted in Warren County.

However, WCTS is dedicated to providing service all any resident seeking transportation, including LEP persons.

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Factor 2 – Frequency of LEP Use

Key programs and major points of contact were consulted to determine the frequency of LEP use in the WCTS program.

The following points were discovered from this consultation:

- One Hindi speaking patron uses the system five days a week twice per day. This patron communicates through a daughter who translates. He also communicates through another patron we take to the same destination around the same time.
- One Spanish speaking patron uses the transit five days a week once per day. This patron communicates through a son who translates.
- One Haitian Creole speaking patron uses the transit five days per week, mostly once per day, but on occasion twice. She communicates through her son who translates.
- We have a phone line available to help with translation. Also, Brochures in Spanish are available.

In researching how other agencies reach out to non-English speaking patrons, WCTS interviews other agencies that interact with persons with LEP. The following is a summary of this research:

The Water and Sewer Department has several customers that are non-English speaking. Approximately twice a month, employees will converse with LEP individuals either in person or on the phone. Typically, when on the phone, the LEP person will conference in an English-speaking family member. In person, people often use an interpreting phone app. They report that the most frequent non-English language they encounter is Russian and Asian languages.

Warren County Human Services is required by the State of Ohio to have an interpretation service. They use a third party interpretation line to communicate. The most frequent languages are Spanish, Russian, and Asian languages such as Uzbek.

Warren County's Ohio Means Jobs Agency has clients that speak Uzbek, Russian, and Spanish. One of the agencies that they partner with, Adult New Reader Program, has a representative that speaks Spanish and volunteers interpreting. Otherwise, their clients use phone apps to interpret.

Synopsis of How Many Persons Need Language Assistance: Other than the occurrences listed above, LEP encounters have been rare with WCTS. Federal, state and local data indicate that the actual number of persons with LEP who live in Warren County is limited. The analysis of data suggests that there is slight rise in Asian and Russian/Ukrainian languages. Most people are able to communicate via phone apps, family members, or third party phone lines.,

Factor 3 – Importance of WCTS

It is the policy of Warren County Transit Service (WCTS) to provide meaningful access to all individuals requesting transportation services administered by, supervised by, authorized by WCTS. Meaningful access involves WCTS promoting effective communication to LEP individuals seeking or receiving services to the transportation program funded in whole or part by federal funds. This plan specifically provides necessary assurances and identifies tools being used to complete this policy.

Factor 4 – Resources and Costs for LEP Outreach

WCTS offers, at no cost to the LEP individuals or families, interpreter services to all LEP individuals seeking transportation services in an efficient and timely manner so as not to delay transportation services beyond that of an English speaking individual or family. The WCTS Brochure explains that Interpreter Services are available. A Spanish brochure is also available.

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Dispatch workers and office workers who handle tickets and forms are instructed to encourage LEP persons to call the translation service line. If written communication is received, an interpreter will be sought for such occasions.

The cost to WCTS to provide the abovementioned services have been minimal. For example, in 2022, the translation service line cost \$77.16.

6. Boards

The Warren County Board of County Commissioners oversees WCTS program. All financial and procedural decisions are made by the board and set forth by resolution.

A non-elected Transit Advisory Committee board has been established. This board serves to offer input and guidance for WCTS. Its focus is to represent the population of Warren County. Below is a matrix showing race of the most recent board members.

	Caucasian	Asian American	African American	Latino
Population	86.9%	6.9%	3.9%	3.2%
Access Committee	100%	0%	0%	0%

As committee member replacements are made for the future, persons of any race will be considered. Openings will be advertised publicly. Care will be given to appoint people who adequately represent the area, including minorities, LEP persons, and low- to moderate-income persons.

7. Sub-Recipients

WCTS does not utilize sub-recipients.

Note: Warren County Transit Service has not conducted any facilities, such as vehicle storage or maintenance facilities or operation centers.

ⁱ <https://www.census.gov/quickfacts/fact/table/warrencountyohio/PST045221>

ⁱⁱ <https://worldpopulationreview.com/us-counties/oh/warren-county-population>