

Title VI Plan For Champaign Transit System

Adopted by Champaign County Board of Commissioners: _____
Resolution Dated: _____

Champaign County Board of Commissioners

Title VI Program

Adopted October 18, 2012 Revised 2014, Revised August 2015

Plan Statement

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance" (42 U.S.C. Section 2000d).

Champaign County Board of Commissioners (operating as Champaign Transit System) is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.B.

This plan was developed to guide the Champaign County Board of Commissioners (hereinafter referred to as "the Board") in its administration and management of Title VI related activities.

Title VI Coordinator Contact information

Andrea Millice, Administrative Assistant
1512 S US Highway 68 Suite A 100
Urbana, Ohio 43078
937-484-1611

Notifying the Public of Rights Under Title VI
Champaign County Board of Commissioners

The Champaign County Board of Commissioners (operating as Champaign Transit System), 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 he or she has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the Champaign County Board of Commissioners.

For more information on the Champaign County Board of Commissioners Civil Rights Program, and or the procedures to file a complaint, contact Andrea Millice @ 937-484-1611 (TTY 800-750-0750), email – amillice@co.champaign.oh.us, or visit the office located at 1512 S US Highway 68, Suite A100, Urbana, Ohio 43078. For further information visit www.co.champaign.oh.us under the transportation department location.

For transportation related Title VI matters, a complainant may file a complaint directly with the Ohio Department of Transportation by filing a complaint with the Office of Equal Opportunity, Attention Title VI Coordinator, 1980 West Broad St., Columbus, Ohio 43223.

A complainant may also file directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington DC 20590.

If information is needed in another language, contact 937-653-8777

Si se necesita informacion en otro idioma, LLame al numero 937-653-8777

Title VI Information Dissemination

Title VI information posters shall be prominently and publicly displayed in all CTS facilities and on the all transit vehicles. The name of the Title VI coordinator is listed above. Additional information relating to nondiscrimination obligation can be obtained from the Title VI Coordinator.

During New Employee Orientation, new employees shall be informed of the provisions of Title VI, and CTS's expectations to perform their duties accordingly.

All employees shall be provided a copy of the updated Title VI Plan and are required to sign the Acknowledgement of Receipt (see Appendix A).

Subcontracts and Vendors

All subcontractors and vendors who receive payments from CTS where funding originates from any federal assistance are subject to the provisions of Title VI of the Civil Rights Act of 1964 as amended.

Written contracts shall contain non-discrimination language, either directly or through the bid specification package which becomes an associated component of the contract.

Record Keeping

The Title VI Coordinator will maintain permanent records, which include, but are not limited to, signed acknowledgements of receipt from the employees indicating the receipt of CTS Title VI Plan, copies of Title VI complaints or lawsuits and related documentation, and records of correspondence to and from complainants, and Title VI investigations.

Title VI Complaint Procedures

How to file a Title VI Complaint?

The complainant may file a signed, written complaint up to one hundred and eighty (180) days from the date of the alleged discrimination. The complaint should include the following information:

- Your name, mailing address, and how to contact you (i.e., telephone number, email address, etc.)
- How, when, where and why you believe you were discriminated against. Include the location, names and contact information of any witnesses.
- Other information that you deem significant

The Title VI Complaint Form (see Appendix B) may be used to submit the complaint information. The complaint may be filed in writing with the Board at the following address:

Champaign County Board of Commissioners
1512 S US Highway 68
Suite A 100
Urbana, Ohio 43078

NOTE: The Board encourages all complainants to certify all mail that is sent

through the U.S. Postal Service and/or ensure that all written correspondence can be tracked easily. For complaints originally submitted by facsimile, an original, signed copy of the complaint must be mailed to the Title VI Coordinator as soon as possible, but no later than 180 days from the alleged date of discrimination.

What happens to the complaint once is it submitted?

All complaints alleging discrimination based on race, color or national origin in a service or benefit provided by the Board will be directly addressed by the Board. The Board shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. Additionally, the Board shall make every effort to address all complaints in an expeditious and thorough manner.

A letter acknowledging receipt of complaint will be mailed within seven days (Appendix C) to the complainant. The Board has [30] days to investigate the complaint. If more information is needed to resolve the case, the Board may contact the complainant. The complainant has (15) business days from the date of the letter to send requested information to the investigator assigned to the case. Please note that in responding to any requests for additional information, a complainant's failure to provide the requested information may result in the administrative closure of the complaint. If the investigator is not contacted by the complainant or does not receive the additional information within (15)business days, the Agency can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

How will the complainant be notified of the outcome of the complaint?

The Board will send a final written response letter (see Appendix D or E) to the complainant. In the letter notifying complainant that the complaint is not substantiated (Appendix E), the complainant is also advised of his or her rights to: 1) appeal within seven calendar days of receipt of the final written decision from the Board, and/or 2) file a complaint externally with the Ohio Department of Transportation and/or the FTA. Every effort will be made to respond to Title VI complaints within 60 working days of receipt of such complaints, if not sooner.

If an attorney is retained by the Board, the following sample language will be inserted in the written response:

Once sufficient information for investigating the complaint is received by the Board, a written response will be drafted subject to review by the transit's attorney. If appropriate, the Board's attorney may administratively close the complaint. In this case, the Board will notify the complainant of the action as soon as possible.

In addition to the complaint process described above, a complainant may file a Title VI complaint with the following office:

The Ohio Department of Transportation
Civil Rights
Attention: Title VI Program Coordinator
1980 West Broad Street
Columbus, Ohio 43223

Federal Transit Administration Office of
Attention: Title VI Program Coordinator
East Building, 5th Floor - TCR
1200 New Jersey Ave., SE
Washington, DC 20590

Appendix A

Acknowledgement of Receipt of Title VI Plan

I hereby acknowledge the receipt of CTS's Title VI Plan. I have read the plan and am committed to ensuring that no person is excluded from participation in, or denied the benefits of CTS's transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.A.

Employee signature

Print your name

Date

Section IV

Have you previously filed a Title VI complaint with this agency?	Yes	No
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Section V

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?

Yes No

If yes, check all that apply:

Federal Agency: _____
 Federal Court _____ State Agency _____
 State Court _____ 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

Please submit this form in person at the address below, or mail this form to:
 Champaign County Board of Commissioners - Title VI Coordinator
 1512 S US Highway 68, Suite A1000
 Urbana, Ohio 43078

APPENDIX C

Letter Acknowledging Receipt of Complaint

Today's Date

Ms. Jo Doe
1234 Main St.
Somewhere, Ohio 53000

Dear Ms. Doe:

This letter is to acknowledge receipt of your complaint against the Champaign County Board of Commissioners (operating as Champaign Transit System) alleging

An investigation will begin shortly. If you have additional information you wish to convey or questions concerning this matter, please feel free to contact this office by telephoning 937-484-1611, or write to me at this address.

Andrea Millice, Title VI Coordinator
Champaign County Board of Commissioners
1512 S US Highway 68, Suite A100
Urbana, Ohio 43078

Sincerely,

Andrea Millice, Title VI Coordinator

APPENDIX D

Letter Notifying Complainant that the Complaint Is Substantiated

Today's Date

Ms. Jo Doe
1234 Main St.
Somewhere, Ohio 53000

Dear Ms. Doe:

The matter referenced in your letter of _____ (date) against the Champaign County Board of Commissioners (operating as Champaign Transit System) alleging Title VI violation has been investigated.

(An/Several) apparent violation(s) of Title VI of the Civil Rights Act of 1964, including those mentioned in your letter (was/were) identified. Efforts are underway to correct these deficiencies.

Thank you for calling this important matter to our attention. You were extremely helpful during our review of the program. ***(If a hearing is requested, the following sentence may be appropriate.)*** You may be hearing from this office, or from federal authorities, if your services should be needed during the administrative hearing process.

Sincerely,

Andrea Millice, Title VI Coordinator
Champaign County Board of Commissioners
1512 S US Highway 68, Suite A100
Urbana, Ohio 43078

APPENDIX E

Letter Notifying Complainant that the Complaint Is Not Substantiated

Today's Date

Ms. Jo Doe
1234 Main St.
Somewhere, Ohio 53000

Dear Ms. Doe:

The matter referenced in your complaint of _____ (date) against the Champaign County Board of Commissioners (operating as Champaign Transit System) has been investigated.

The results of the investigation did not indicate that the provisions of Title VI of the Civil Rights Act of 1964 had in fact been violated. As you know, Title VI prohibits discrimination based on race, color, or national origin in any program receiving federal financial assistance.

The Board of Commissioners has analyzed the materials and facts pertaining to your case for evidence of its failure to comply with any of the civil rights laws. There was no evidence found that any of these laws have been violated.

I therefore advise you that your complaint has not been substantiated, and that I am closing this matter in our files.

You have the right to 1) appeal within seven calendar days of receipt of this final written decision from the Board of Commissioners and/or 2) file a complaint externally with the Ohio Department of Transportation, Office of Transit and/or the Federal Transit Administration at:

The Ohio Department of Transportation
Civil Rights
Attention: Title VI Program Coordinator
1980 West Broad Street
Columbus, Ohio 43223

Federal Transit Administration Office of
Attention: Title VI Program Coordinator
East Building, 5th Floor - TCR
1200 New Jersey Ave., SE
Washington, DC 20590

Thank you for taking the time to contact us. If I can be of assistance to you in the future, do not hesitate to call me.

Sincerely,

Andrea Millice, Title VI Coordinator

APPENDIX F

List of Investigations, Lawsuits and or Complaints

Action	Date	Summary	Status
	(month, day, year)	(basis, color, race)	
Investigations	NONE FROM January 1, 2012 thru December 31, 2017		
1.			
2.			
Lawsuits	NONE FROM January 1, 2012 thru December 31, 2017		
1.			
2.			
Complaints	NONE FROM January 1, 2012 thru December 31, 2017		
1.			
2.			

Please Use other pages or attachments if necessary to explain.

PUBLIC PARTICIPATION PLAN

INTRODUCTION

Champaign Transit System (CTS) is a demand - response door to door public transportation system that operates in Champaign County, Ohio. Riders are asked to please try and give a twenty-four hour notice if possible, some same day trips are usually available.

This plan will inform the public the different ways they can have participation in CTS planning, as well as have and give feedback to CTS operations and other transit items of interest. CTS will make efforts to reach those persons of low to moderate income, limited English proficiency (LEP) and those with diverse backgrounds.

PURPOSE

Pursuant to the revised Title VI, 4702.1B Circular, the Citizen Participation Plan is hereby being adopted by CTS and its governing board to ensure that all citizens of Champaign County, Ohio including persons from diverse racial backgrounds, persons with disabilities, persons with limited English proficiency and persons with low to moderate income levels are given the opportunity to actively participate in planning and implementation of CTS activities.

CITIZEN PARTICIPATION

Champaign County citizens are encouraged to participate in any forums involving CTS: including but not limited to such items as input into grant applications, grant procedures, CTS

policies & procedures planning that may occur during public forums, transit advisory meetings or monthly transit commissioners meetings.

The County encourages participation from minorities, limited English proficient speaking residents, persons with disabilities and low to moderate income residents.

CTS has on its Transit Advisory Committee (TAC) representatives from city and county government, social service agencies, disabled persons and minorities. All of these TAC members work to include all Champaign County residents when planning.

CITIZEN COMMENTS

CTS will give the residents of Champaign County the opportunity to review and comment on any documents or plans that do or do not require specific review and comment periods. The County and CTS will review citizens' concerns, comments and any recommendations. The Urbana Daily Citizen (UDC) will be used for notifications in accordance to ODOT mandates. All documents will be made available upon request in other formats to persons with disabilities. Said documents will be considered public and made available upon request at the CTS office, 308 Miami Street Suite D, Urbana, Ohio 43078 during the normal business hours of Monday thru Friday from 7:00am to 5:30 pm.

PUBLIC HEARINGS

CTS has at least one public hearing annually prior to submitting the ODOT grant application. This hearing and all others are held in an accessible location, usually the Champaign County Community Center @ 1512 S. US highway 68, Suite A100. The grant application is advertised in the UDC a minimum of 30 days prior to the hearing. All hearings will have the date, the time, and the location of the hearing. All the hearings will be conducted during CTS hours of operation in order to make more accessible to those who may have transit needs.

PUBLIC MEETINGS/FORUMS

Champaign County citizens are encouraged to attend any scheduled meetings or forums. Notices will be placed in the UDC in the *Legal Section* or the *Community Calendar Section*. Notices are also placed in two locations in the Champaign County Community Center, 1512 S US 68 and in the County Court House, 200 North Main Street. Public hearings as noted earlier will be held in accessible locations and during CTS hours of operation which helps provide a greater likelihood that participation is all inclusive to our target audience.

CTS DOCUMENT AVAILABILITY

All documents associated with the transit system will be made available upon request. Materials can be made available in other accessible formats to persons with disabilities with an advance notice. These materials can be obtained at the CTS office. Please call 937-653-8777 to discuss what format may be needed.

CITIZEN COMPLAINTS

The Champaign County Commissioners have adopted the CTS Policy and Procedure Manual which outlines on page # 102 how citizens can file complaints or make comments including any items related to Title VI issues. These procedures are also outlined in the Title VI statement that is available in the CTS Office lobby and on each CTS vehicle, as well as the Champaign Transit website available from the Champaign County website under the transportation tab.

PERSONS WITH DISABILITIES

To accommodate persons with disabilities all CTS meetings/forums will be held in accessible locations for those persons with mobility restrictions. CTS also has accessible vehicles available at these times to provide transportation to and from all meeting/forums. Call 937-653-8747 to schedule a ride.

PERSONS WITH LIMITED ENGLISH PROFICIENCY

Using the 2010 Census figures it is apparent Champaign County does not have any high concentrations of non-English speaking residents. CTS will however makes every effort to provide any transportation or interpretation needs if given at least three (3) days notice to do so. Costs that may be associated with these services will be covered with CTS funds using the ODOT grant monies. No additional fees will be charged to persons requiring additional help. Champaign Transits LEP Plan will be reviewed annually by the Champaign County Commissioners and the CTS TAC. Any changes will be reviewed and adopted by the Champaign County Board of Commissioners. As noted before in this document, TAC meetings will be published in advance of the meeting and public participation is encouraged.

COMMISSIONERS MEETINGS

Whereas the TAC advises on CTS matters, the Champaign County Commissioners are the actual governing body for Champaign Transit. To insure all TAC information is communicated proficiently to the County Commissioners the board has assigned Dave Faulkner, County Commissioner, to serve as a TAC member.

The Champaign County Commissioners generally meet every Tuesday and Thursday starting @ 8am. CTS have a standing 9 am appointment on the third Thursday of each month.

The TAC will meet in 2015 on March 11, June 10, September 9 and on December 9. Both of these entities will meet in the Champaign County Commissioners office, 1512 S US 68, Urbana, Ohio 43078 unless otherwise noted and posted.

SUMMARY OF CURRENT OUTREACH EFFORTS BY CTS

Yearly as the migrant workers arrive in town, CTS will make contact with the farms in order to set up a meeting to offer assistance to the LEP workers for any transportation needs they may have.

As the Urbana University students arrive on campus in the fall we will attend the Open House and set up a table to explain about CTS and what they can offer to students with LEP needs.

Providing public notice to all hearings, meetings/forums as written previously

Post in CTS vehicles and Office Lobby the Title VI notice

Limited English Proficiency Plan

Champaign Transit System

308 D Miami Street

Urbana, Ohio 43078

11/26/2008

Adopted October 18, 2012

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I. Purpose:

This document establishes the guidance for the employees of Champaign Transit System with regards to the Limited English Proficiency, herein referred to as (LEP), in assistance to those persons who may use CTS in regards to language barriers.

II. Policy:

It is the Champaign County Board of Commissioners and CTS policy to provide meaningful access to its services to persons to whom, as a result of national origin, or other reasons are limited in English proficiency. The Champaign County Board of Commissioners and the TAC has reviewed this plan to provide meaningful access to CTS by persons with LEP.

III. Authorization/Definitions:

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000 et seq.; 45 CFR 80, nondiscrimination based on race, color or national origin for any programs receiving federal financial assistance. Failure to provide meaningful access to program information, benefits and /or services due to an applicant/ recipient's LEP is considered discrimination based on national origin.

U.S. Department of Justice Title VI Legal Manual, January 11, 2001 edition
U.S. Department of Labor Policy Guidance on the Prohibition of National Origin Discrimination as it pertains to persons with Limited English Proficiency (05/29/03) Federal Register, Volume 68, Number 103, Page 32289-32305

Executive Order 13166, "Improving Access to Service for Persons with Limited English Proficiency."

Definitions:

County Agency- Any County Agency standing alone or any combined agencies with a single administrative structure; JFS, WIC, Health Department, etc.

Effective Communication- When staff take the necessary steps to assure that a LEP person is given adequate information in his/her own language to fully understand the provided services offered and the requirements of those services;

Interpretation- Is the written or spoken transfer of a message or information from one language into another language;

Limited English Proficiency (LEP)-A person with LEP is not able to speak, read, write or understand the English language well enough to allow him/her to interact with a county agency;

Translation- the written or verbal transfer of a message from one language into another language;

IV. Applicability:

This directive applies solely to the Champaign Transit System (CTS) and has been adopted by the Champaign County Board of Commissioners for the purpose of providing transit for persons with LEP.

V. Limited English Proficiency Plan

A. Statement of Service

LEP individuals are those whose proficiency in speaking, writing, reading or understanding English as a result of national origin is such that it would deny or limit their access to the services provided by CTS if language assistance were not provided. CTS are taking steps as outlined in this plan, to assist LEP individuals

in accessing CTS services. We are also committed to improving the effort throughout Champaign County. This LEPP is designed to help employees of CTS by providing them with guidance on interpretation, translation, and outreach services for LEP persons associated with CTS. The top priority of the plan is to make sure LEP individuals have access to critical services and activities. This plan does not address how other county agencies deal with or handle LEP persons.

B. Identification of LEP individuals/population:

According to the Champaign County Chamber of Commerce 2010 Census information, there are 2.2% of the 39,795 population for Champaign County age 5 or older that speak a language other than English at home. Of that 2.2%, 1.2% of those are individuals of Hispanic or Latino origin. Therefore we have approximately 880 people in the County that speak something other than English at home and 440 of those or more would be speaking Spanish as their primary language at home.

Also checked was the 2010-2011 Ohio Department of Education Report Card for all schools in Champaign County and they do not have enough LEP students (10 minimum) to be listed on the report card.

C. LEP information from other Champaign County Agencies and Business Associates:

CTS have checked with the following agencies about LEP individuals that they have come in contact with within the last year (2012). (2014) (2015)

Health Department/WIC; they stated they have only had two individuals in their offices in the last (2) years and they both spoke Spanish; they have a Spanish chart (poster) that people can point to for help. They also have a number to call if needed. Same 2014, Same 2015

Board of Elections: None in the office and no election day issues in 2012. (2015)

Bureau of Motor Vehicles; they serviced between 40-50 individuals over the last year, split between college Japanese students and migrant workers from a local potato farm. They stated that all the individuals had persons with them to help with the interpretation. About the same in 2015 perhaps a few more or less.

C TECH; one Spanish speaking person and they got help from a worker from the Health Department to assist. 2015

Child & Family First; had one last year- 2015 – same as 2014 - One Mother with Grandma and mother acted as the translator.

Clerk of Courts; 2015 they had a couple families that spoke Spanish but spoke English well enough to be helped.

JF & S; None in the last year or so that anyone remembers. 2015 - Seven over the last year, 6 Spanish and 1 Samoan. In all cases they called Germain Interpretation Services in Dayton that actually come on site to work.

Auditor; ten or less on the phone and in person and they just muddled thru with them and were able to help them. 2015- Zero in spare office, main office gets at least 1 call a week usually for title search that are hard to understand and perhaps 10 folks inside that they work with.

MRDD; one gentleman in the last year and his wife or child interprets for him. Nothing in 2015. MRDD is now just office. A private company purchased the workshop.

Veterans Service Commission; none since he has been there. None in 2015

CRSI; – 2015– said they do not keep track of such information.

Urbana Senior Center; none that anyone can think of. None in 2015

Champaign County Chamber of Commerce - 2015 – 6 all Spanish – Broken English and they were able to help all of them with their needs.

CTS; we have several persons that we have trouble understanding that speak English and we set up email with them and then they write down where they need to go and the driver calls it in. No actual foreign language issues in 2015.

D. Methods of Providing Services to LEP Population;

Bi-lingual Employee(s) Spanish speaking JFS (1) Health Dept. (1)

Volunteer Interpreters – See Attachment

Telephone Interpreter Services – See Attachment

Web Site services- used on an as needed basis

<http://translation1.paralink.com>

<http://www.translation.Paralink.com>

http://www.new-global.com/phone_interpreter_services/

<http://www.languageline.com>

E. Interpreter Services;

CTS will at no cost to the individual or family, try and provide the interpreter necessary to help provide individuals with the information to utilize our services. The services will be provided in an efficient and timely manner so as not to delay the use of the transit service by the individual or their family.

CTS will address phone calls and voice messages by LEP individuals in the following manner; when a call is received from an LEP individual we will attempt to determine the required language and ask the client to hold while we try and contact one of our resources listed in section V or D to assist in the process. All

walk in individuals will be handled in the same manner as far as determination of language needed and then waiting until we can get help that is needed. If drivers encounter LEP without the previous contact of the office dispatcher or other office staff they will handle the situation in this manner: The driver will try the translation paper in each van to find out what language we are dealing with then they if needed will bring the rider to the CTS office so that we may treat the LEP as if they were a walk in client. This can be accomplished in most areas of the county due to the size of our area being somewhat limited.

Available Interpreter Services:

Language: Spanish

ODJFS – Victoria Carmona (937) 657-8805

ODJFS – Maria Goeser (937) 484-1500

Café Paradiso – (937) 653-8040 Patsy Thackery

carnov@odjfs.state.oh.us

Sue Dikes – (937) 652-2607

Language: Russian

Wittenberg University

Lila Zaharkov (937) 327-6358

Other Languages Contact (937) 327-6350

Urbana University- German, Chinese, Italian

(937) 484-1354

Languages Various:

US Together Inc. (614) 581-4357- Russian, Ukranian, Hebrew,

VocaLink (937) 201-1331 – Spanish, Arabic, French, German, Italian, Japanese, Russian, and Misc. other languages

Bank of Translation Services – Central & Southwest Ohio

AY Translation Service – (614) 771-8950

Agi Risko – (614) 447-1037

Altco Translation – (614) 486-2014

Anthony Frey – (937) 385-7664 - German

Arelette Demel – (937) 777-7817- French, German, Italian

Central Ohio Interpreting – (614) 274-6279

George Ottoni (937) 677-5338 – Spanish, Portuguese

Gustavo Villar – (614) 457-8911 – Spanish

Hiroimi Beck – (937) 644-0455 – Japanese

John Galvin – (937) 923-4206

Hearing Impaired:

Community Services for the Deaf

(937) 640 -8032

F. Document Translation;

CTS has had the Urbana High School advanced Spanish Class (Spanish IV) interpret our CTS pamphlet into Spanish. We have chosen that language based on it being the most likely to be needed for interpretation in our area. Any other translation needs will be handled as needed at that time after language determination is made.

G. Dissemination of Information to CTS personnel;

CTS will make sure all drivers and office help are aware of this LEPP and its policies; the methods of providing services to LEP individuals and other information contained within this plan through the following; new employee orientation, LEPP handouts, copy of plan.

New this year each van has a Language Line Solutions Interpretation Sheet. (See Attachment).

H. Plan Review;

CTS will review the LEPP as often as deemed necessary and any time new LEP individuals need CTS services. CTS will also check with other county offices and city agencies yearly to see if any LEP encounters have come up.

FOUR - FACTOR ANALYSIS:

Factor #1:

Number or Proportion of Persons Eligible to be Served

- A. CTS currently have no LEP riders. In the last four years we have had one Spanish speaking woman that has now passed. She would have family members make and cancel her appointments to and from destinations. While on the van she spoke enough broken English to get her message across to drivers.
- B. Champaign County does not have and specific identified communities. The county does have a local potato farm (Michael's Farm) that does house a number of seasonal migrant workers during the summer months. Urbana University, when in session has a good number of Chinese students that are on campus.
- C. The county schools do not have enough LEP students (min. 10) to determine a literacy rate. This information is taken from the 2010 – 2011 Ohio School Report Cards which can be seen in the Attachments for each school.
- D. Having contacted other county agencies as well as Urbana city agencies and businesses (pg.6) it is fair to say that LEP persons are not being underserved by CTS due to any language barriers.

Factor #2:

The frequency with which LEP persons come into contact with CTS

- A. CTS do not currently have any LEP riders. We have gone to the Urbana University orientation to put out information there for any of the Chinese students, or any other foreign students that may need transportation around the county. In the last year we have not had any LEP riders.
- B. We have some riders that are very hard to understand on the telephone but do to speech issues not LEP. We have not received any LEP calls in the last year.
- C. In attending many public meetings and functions in the last year I have not had any contact with LEP persons. In contacting the Urbana City Council and the Champaign County Board of Commissioners (CCB of C) there have been no LEP issues or visitors at any meetings within the last year.
- D. CTS interaction with LEP persons although currently none is addressed on pages 6 & 7 as far as how the contact with these individuals will be handled.

Factor #3:

Nature and Importance of CTS to LEP persons.

- A. CTS provide door to door demand response service to all residents of Champaign County and to all areas of Champaign County as well as to medical appointments in a fifty mile radius of Urbana. The CTS service is vital to all county residents including those with LEP skills. Our riders use CTS for a number of different reasons which include but are not limited to; health reasons, social service, work, education, and

socializing. CTS make every possible effort to be on schedule even during inclement weather days. Exceptions would be weather considered unsafe by local authorities.

- B. With the information gathered from contacts made to agencies throughout the county (pg. 6), it is determined that LEP contacts are relatively minimal. LEP contacts based on the 2010 Champaign County Census (see attachments) would more than likely be Spanish or Chinese (when the University is in school). The LEP persons from Champaign County are best served by our demand response service because of the availability of assistance for them at their locations (work farm, University).

Factor #4:

CTS Resources and Anticipated Costs of Providing LEP Access.

To date CTS feels comfortable with the ability to provide LEP assistance in Spanish and Chinese, if needed, within a short time frame with the current list of contacts from pages 7 & 8 of this document. No additional costs associated are being discussed at this time. If in the future any major changes occur in CTS ridership it will be addressed at that time with the CCB of C and the transit system TAC. With limited transit funds always a concern efforts will be made to have LEP assistance provided at no additional charge to the transit system if at all possible.

Table of non-elected TAC members
Depicting Membership broken down by Race

Body	White	Black or African American	American Indian or Alaska Native	Asian	Native Hawaiian or Other Pacific Islander	Some Other Race	Two or More Races
Population*	94.7%	2.2%	0.4%	0.4%	< 0.1%	0.4%	1.9%
TAC	73%	27%	0%	0%	0%	0%	0%

*Source: 2010 Census

Whenever a TAC spot becomes open the committee discusses possibilities as to whom they would like to consider to become a TAC member. Title VI issues are taken into account at that time.