Federal Transit Administration Title VI Program

Version 0624-5310

Society for Equal Access/ILC

Effective Date of Plan:

January 1, 2025

Title Vi Contact Information

Contact (Position): Ada Mears, Executive Director

Contact Phone Number: 330-343-3668 Contact Email: amears@seailc.org

Mailing Address: 22 Bank Lane Dover, Ohio 44622

Websitewww.amears@seailc.org

Language Interpretation Assistance

Interpretation Services Provided By Tuscarawas County Public Library For Interpreter Services Individuals Will Call 330-364-4474

January 25 Page 1 of 19

Title VI Plan Table of Contents

The Society for E	qual Access/ILC Title	VI plan includes the	following elements
-------------------	-----------------------	----------------------	--------------------

- 1. Plan Approval, Annual Certifications and Assurances, Revision Log
- 2. Policy Statement
- 3. Notice to the Public
- 4. Complaint Procedure
- 5. Complaint Form
- 6. List of transit related Title VI Investigations, Complaints and Lawsuits
- 7. Public Participation Plan
- 8. Language Assistance Plan
- 9. Minority Representation Table and Description
- 10. Providing Assistance to and Monitoring Subrecipients

Section 1: Plan Approval & Compliance Requirements

Title VI Plan				
	September	22,	2023	
	Society for Eq	ual Acc	ess/ILC	Board of
Adopted by:	Directors			
Adopted on:				

January 25 Page 2 of 19

Signature(s):

Revised: <u>May 1. 2025</u>

January 25 Page 3 of 19

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.

Society for Equal Access/ILC 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: 01/01/2025

Title VI Plan Revision Log

Date Month/day/year	Section Revised	Summary of Revisions		
			-	

Section 2: Policy Statement

Policy Statement

Society for Equal Access/ILC, operating demand response transit provider, as a recipient of Federal Transit Administration (FTA) grant dollars either directly from FTA or through the Ohio Department of

January 25 Page 4 of 19

Transportation (DOT), will comply with the Title VI of the Civil Rights Act of 1964 (42 USC. 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. Society for Equal Access/ILC operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act,

January 25 Page 5 of 19

Title VI Notice to the Public

Society for Equal Access/ ILC's Notice to the Public is as follows:

Notifying the Public of Rights Under Title VI

Society for Equal Access/ILC

The Society for Equal Access/ILC 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 Society for Equal Access/ILC.

For more information on the Society for Equal Access/ ILC's civil rights program, the procedures to file a complaint, or to file a complaint, please contact the Ada Mears, Executive Director at 330-343-3668 (Try 800-750-0750); email www.seailc.org; or visit our administrative office at 22 Bank Lane Dover, Ohio 44622. For more information, visit www.seailc.org.

For transportation-related Title VI matters, a complaint may also be filed directly with the:

Ohio Department of Transportation, Attn: Office of Opportunity, Diversity, and Inclusion, Title VI Coordinator, <u>1980</u> West Broad Street, Mailstop 3270, Columbus, Ohio 43223

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 1-800-222-3333...

FTA states that: agencies shall inform the public of their rights under Title V/ through such measures as posting the Title V/ notice on posters, comment cards, or flyers placed at stations, bus shelters, and in transit vehicles. The type, timing, and frequency of these measures are at the recipient's discretion, as long as the type, timing, and frequency are sufficient to notify passengers and other interested persons of their rights under DOT's Title V/ regulations with regard to the recipient's program. As such, Society for Equal Access/ ILC's Notice to the Public can be found at the following locations (check all that apply):

 \boxtimes In public areas of the office, including reception room and meeting rooms. \boxtimes On the agency website.

E In the agency brochure. ☑ In the agency vehicles.

Sample 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 such as a language translator.

Note: Follow this template below for any additional languages required by your Language Assistance Plan.

Notificación al público de derechos bajo el Título VI

El Society for Equal Access/ILC opera sus programas y servicios sin distinction de raza, color y origen nacional, segun el Título VI de la Ley de Derechos Civiles. Cualquier persona que cree o que ha sido perjudicada por una práctica discriminatoria ilegal bajo et Título VI puede presentar una queja con el Society for Equal Access/ILC.

Para obtener más información sobre el programa de derechos civiles de Society for Equal Access/ILC, o para obtener más información sobre los procedimientos para presenter una queja, por favor llame a Ada Mears, Executive Director330-343-3668 (TTY 800-XXX•XXX), www.seailc.org, o visite nuestra oficina administrativa en 22 Bank Lane Dover, Ohio 44622.

Un demandante puede presenter una queja directamente a la el Departmento de Transporte del estado de Ohio, Attn: Office of Opportunity, Diversity and Inclusion 1980 West Broad Street, Mailstop 3270, Columbus, OH 43223.

Un demandante puede presenter una queja directamente a la Administración Federal de tránsito, Office of Civil Rights, Atención: Complaint Team, East Building, 5th FloorTCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

Si se necesita información en otro idioma, comuníquese con 1-800-222-3333...

January 25 Page 7 of 19

Section 4: Complaint Procedure

Society for Equal Access/ILC's Title VI Complaint Procedure is made available in the following locations:

- Agency website at: www.seailc.org
- ☑ 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 Society for Equal Access/ILC may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form.

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 Society for Equal Access/ILC 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 of the latest instance of the conduct.

Once the complaint is received, Society for Equal Access/ILC will review it to determine if our office has jurisdiction. A copy of each Title VI complaint received will be forwarded to the New Hampshire 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.

Society for Equal Access/ILC has 45 days to investigate the complaint. if more information is needed to resolve the case, Society for Equal Access/ILC may contact the complainant requesting further information. The complainant has 10 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 10 business days, Society for Equal Access/ILC can administratively close the case.

After the investigator reviews the complaint, the agency will issue one of two (2) letters to the complainant: a closure letter or a letter of finding (LOF).

- ✓ A <u>closure letter</u> summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.
- 5/ A <u>letter of finding (LOF)</u> 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 it must direct the appeal to the agency initially. The complainant has 10 days after the date of the closure letter or the letter of finding to do so. If there is outstanding concern, the appeal may be directed to the state DOT or FTA. The appeal process information will be included in the letter.

January 25 Page 8 of 19

A person may also file a complaint directly with the: Ohio Department of Transportation, Attn: Office of Opportunity, Diversity and Inclusion 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 1-800-222-3333...

January 25 Page 9 of 19

Title VI				
Section 5: Co	omplaint Form			
Society for Equal Access,	/ILC's Title VI Complaint P	Procedure is made	available in t	he following locations:
☑ Agency website, i ☑ Hard copy in the	f available: www.seailc.or	rg		
Agency Title VI Pl	an			
Section I:				
Name:	0.700	- CONTROL		
Address:				
		Telephone	(Mark):	
Telephone (Home):	20-2	Telephone	(VVOIK).	
Email Address:	Lau - Drint		ludio Ta e	
Accessible Format Requirements?	Lar e Print		Audio ta e	
- 1	TDD		Other	
Section II:				
Are you filing this complaint	on your own behalf?		Yes*	No
you answered "yes" to th	is question, go to Section III			
If not, please supply the nan are complaining:	ne and relationship of the pe	erson for whom you		A SERVICE SERV
Please explain why you have	e filed for a third party:			
Please confirm that you ha party if you are filing on beh		on of the aggrieved	Yes	No
Section III:				
I believe the discrimination] Race	I experienced was based on I Color	(check all that appl		
Date of Alleged Discriminati	on (Month Day, Year)			
Explain as clearly as possib persons who were involved you (if known) as well as na back of this form.	, Include the name and con	tact information of	the person(s) v	who discriminated against

Yes

No

Have you previously filed a Title VI complaint with this agency?

Section IV

Section V	
Have you filed this complaint with any other [) Yes t) No	r Federal, State, or local agency, or with any Federal or State court?
If yes, check all that apply:	
[] Federal Agency:	
[) Federal Court	
[] State Court	
Please provide information about a contact	t 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:	
u may attach any written materials or ot	ther information that you think is relevant to your complaint.
gnature and date required below	

If information is needed in another language, contact 1-800-222-3333...

Please submit this form to:

Society for Equal Access/ILC Ada Mears, Executive Director 22 Bank Lane Dover, Ohio 44622 330-343-3668 www.seailc.org

January 25 Page 11 of 19

Section Title VI

6: List of Transit Related

Investigations, Complaints and Lawsuits

Society for Equal Access/ILC maintains a list or log of all Title VI investigations, complaints, and lawsuits, pertaining to its transit-related activities.

Check One:

☑ There have been no investigations, complaints, and/or lawsuits filed against Society for Equal Access/ILC since the last plan submission.

There have been investigations, complaints, and/or lawsuits filed against Society for Equal Access/ILC. See list below. Additional information is to be attached as needed.

	Summary (include basis of complaint: race, color, or national origin	Status	Action(s) Taken
Investigations			
Lawsuits			
Complaints			***

7: Public Participation Plan

Strategies and Desired Outcomes

To promote inclusive public participation, Society for Equal Access/ILC will employ the following strategies, as appropriate (make these determinations based on a demographic analysis of the

January 25 Page 12 of 19

Section

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 Society for Equal Access/ILC since the last Title VI Program submission are summarized in the table below.

Specific Public Participation activities are listed in the table below:

Event Date	Insert Agency Name Staffer(s) or Department	Activity	Communication Method (Public notice, posters, social media)	Notes
August/2024	Heather, Frances, Ada, Kevin	Set up information booth at the Holmes Cty Fair.	Public notice, social media, and in person.	15,000 people attended the fair. It was a great place to meet people to give out information and brochures
October/2024	Transportation	Attended a Senior Day in Tuscarawas County	Social Media	Perfect way to communicate information to the regarding transportation
December/2024	Transportation	Free Rides	Public Notice	Gave free Rides for Zoar's Christmas pageant

January 25 Page 13 of 19

Section		

8: Language Assistance Plan

Plan Components

As a recipient of federal US DOT funding, Society for Equal Access/ILC is required to take reasonable steps to ensure meaningful access to our programs and activities by limited-English proficient (LEP) persons.

Limited English Proficient (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.

Society for Equal Access/ILC'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

Four Factor Analysis Methodology

To determine if an individual is entitled to language assistance and what specific services are appropriate, Society for Equal Access/ILC has conducted a Four Factor Analysis of the following areas: 1) Limited-English Proficient (LEP) Speaker 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, Society for Equal Access/ILC 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;

January 25 Page 14 of 19

Section

(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.

January 25 Page 15 of 19

Factor 2: The frequency with which LEP persons come into contact with the program: Identifies and assesses the frequency Society for Equal Access/ILC's staff comes into contact with LEP persons. Examples of contact could include:

- (a) Use of bus and rail service;
- (b) Purchase of tickets through vending machines, outlets, websites, and over the phone;
- (c) Participation in public meetings;
- (d) Customer service interactions; (e) Ridership surveys; (f) Operator surveys.

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.

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.

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.

Of the 87,058 residents in Society for Equal Access/ILC's service area, 1,000 residents describe themselves as speaking English less than "very well". People of Spanish descent are the primary LEP persons likely to utilize Society for Equal Access/ILC services. For Society for Equal Access/ILC's service area, the latest U.S. Census Bureau data shows that among the area's population 1,000 speak English "less than very well." For these groups who speak English "less than very well", 1.14% speak Spanish

Tuscarawas County Languages Spoke at Home

Total Number	Percent of Population	Total Population of County
7474	8.9%	87,058
1611	1.9%	87,058
749		87,058
31		87,058
	00/0	87,058
		87,058
	7474 1611 749	Total Number Population 7474 8.9% 1611 1.9% 749 31

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

Insert Agency Name assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. Society for Equal Access/ILC provides approximately 5500 passenger trips per year. If an individual has speech limitations, the dispatcher or driver will work with the Ohio Department of Transportation, 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 Society for Equal Access/ILC's programs are important; however, those related to safety, public transit, nondiscrimination and public involvement are among the most important. Society for Equal Access/ILC 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, Society for Equal Access/ILC will strive to provide alternative but meaningfully accessibility. Moreover, Society for Equal Access/ILC continually evaluates its programs, services, and activities to ensure that persons who may be LEP are always provided with meaningful access. The Title VI policy, complaint form, and LEP policy are available in other languages upon request.

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

Society for Equal Access/ILC makes every effort to make its programs, services, and activities, accessible to LEP individuals. Society for Equal Access/ILC 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

Society for Equal Access/ILC has identified, developed, and uses the following:

- a) Individuals who have contact with the public are provided with "I Speak" language cards to identify language needs in order to match them with available services. Language cards verified and distributed by the Director as need.
- b) Society for Equal Access/ILC has developed partnerships with local agencies, organizations, law enforcement, colleges/universities, local school districts and social service agencies that are available to assist with it LEP responsibilities.
- c) A list of web-based translation services can be provided by contracting the Human Resources Department.

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 Society for Equal Access/ILC's language assistance measures, Society for Equal Access/ILC provides the following:

 Title VI Program including the Language Assistance Plan is made available on website, if applicable, and hard copy in central office.

January 25 Page 17 of 19

 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

Society for Equal Access/ILC will continue to update the LEP plan as required by U.S. DOT. At a minimum, the Title VI Plan will continue to be reviewed and updated every three (3) years in conjunction with the Title VI submission and use data from the U.S. Decennial Census or the American Community Survey as available, or when it is clear that the concentrations of LEP individuals are present in Society for Equal Access/ILC 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 Society for Equal Access/ILC's financial resources are sufficient to fund language assistance resources needed.
- Determine whether Society for Equal Access/ILC has fully complied with the goals of this LEP Plan,
- Determine whether complaints have been received concerning Society for Equal Access/ILC'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 Society for Equal Access/ILC staff:

- Information on the Society for Equal Access/ILC Title VI Procedures and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of "1 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.

Limited English Proficient (LEP) Resource Materials:

LEP Policy

Society for Equal Access/ILC 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

January 25 Page 18 of 19

proficient riders will not be used as translators unless specifically requested by that individual. Arrangements have been made with Language Services Inc. to obtain translators. The agency will also utilize web-based translator programs if available.

If you need help with English, please call 1-800-222-3333.

Si usted necesita ayuda con el inglés, por favor llame 1-800-222-3333.

"I Speak" Language Identification Card

Note: For additional languages visit the US Census Bureau website http://www.lep.gov/iSpeakCards2004.pdf

Mark this Box if you		
speak	Language Identification Chart	Language
	Mark this box if you read or speak English	English
	Marque esta casilla si lee o habla español	Spanish
;	Kos lub voj no yog koj paub twm thiab hais lus Hmoob	H mong
	如果说中国在方框内打勾	Chinese
	Xin ñaùnh daáu vaøo oâ naøy neáu quyù vò bieát ñoïc vaø noùi ñöôïc Vieät Ngöõ.	Vietnamese
	당신이한국어말할경우이 상자를표시	Korean
	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	Tagalog
	Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen Oder sprechen	German
	OTMeTMTb 3TOT ecnn Bbl roeopVITe no-pyccKH	Russian
	03HaqhTe OBY KYhuqy ago roBops,1Te cpncKh	Serbian
	आप हिंदी बोलते हैं तो इस बक्से को चिह्नित करें	Hindi
	پر نشان لگانیں تو اس باکس بولتے ہیں اردو اگر آپ	Urdu

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

January 25 Page 19 of 19

					- manufacture -	100	
T					The state of the s	46.800	
	- 1			l .			
	- 1						
						the state of the s	
	and the second						
				100			
					2.0		
				100			
A STATE OF THE PARTY OF T							
	- 1						
					18 V 3 T - 6		
The second second							
		1000					
					177		
	- 3	91					
	11	3					
			1.000				
						43 8190	
				127			
		1.0					
					the second secon		
		- 1					
		1707					
				I			
				1			
				(
		10		1	5-		

Section 9: Minority Representation Information

Recipients that have <u>transit-related</u> 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.

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
Tuscarawas County	92.5%	1.76%	2.918%	.362%	.70/0	1.76%
Board of Directors (SEA)	100%					

Note: insert the number of people and % of total board membership (8 board members volunteers)

B. Efforts to Encourage Minority Participation

To encourage participation on its boards, committees, and councils, the Society for Equal Access/ILC will make every effort to encourage minority participation on the boards. Detail any further efforts below.

Section 10: Providing Assistance to and Monitoring Sub recipients

1. Does agency provide funding to sub recipients (contract services out)?

Mo, the agency does not have sub recipients.

January 25 Page 20 of 19

^{*}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.