

Title VI Plan Table of Contents

The SOCIETY FOR EQUAL 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 Sub recipients
11. Title VI Equity Analysis for Facility Acquisition

Section 1: Title VI Plan Approval & Compliance Requirements

Title VI Plan
Adopted on: May 26, 2020

Adopted by: Board of Directors Society for Equal
Access/ILC

Signature(s): Susan Hogue

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: 05/26/2020

Title VI Plan Revision Log

Date Month/day/year	Section Revised	Summary of Revisions

Federal Transit Administration
Title VI Program
Version 1223

SOCIETY FOR EQUAL ACCESS/ILC

Effective Date of Plan:
January 1, 2024

Title VI Contact Information

Contact (Position): **Executive Director Ada Mears**
Contact Phone Number: **330-343-3668**
Contact Email: **Director: amears@seailc.org**

Mailing Address: **22 Bank Lane, Dover, Ohio 44622**
Website: **wwwseailc.org**

Language Interpretation Assistance

Interpretation Services Provided By: **Tuscarawas County Public Library**
For Interpreter Services Individuals Will Call (Phone Number): **1-330-364-4474**

Section 2: Title VI 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 Transportation (ODOT), will comply with the Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the U.S. Department of Transportation implementing regulations, FTA Circular 4702.1B, and ODOT Public Transportation requirements as specified in Master Grant Agreement, and State Management Plan. 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.

Notifying the Public of Rights Under Title VI

SOCIETY FOR EQUAL ACCESS/ILC

- 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 Executive Director Ada Mears at 330-343-3668 (TF 888-213-4452); email Director: amears@seailc.org; or visit our administrative office at 22 Bank Lane, Dover, Ohio 44622. Check out our website at 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, 1980 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 1-330-364-4474.

Notificación al público de derechos bajo el Título VI

- El SOCIETY FOR EQUAL ACCESS/ILC opera sus programas y servicios sin distinción de raza, color y origen nacional, según el Título VI de la Ley de Derechos Civiles. Cualquier persona que cree o que ha sido perjudicada por una práctica discriminatoria ilegal bajo el Título VI puede presentar una queja con el 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 presentar una queja, por favor llame a Executive Director Ada Mears 330-343-3668 (TTY 800-XXX-XXX), Director: amears@seailc.org, o visite nuestra oficina administrativa en 22 Bank Lane, Dover, Ohio 44622.
- Un demandante puede presentar una queja directamente a la el Departamento 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 presentar una queja directamente a la Administración Federal de tránsito, Office of Civil Rights, Atención: Complaint Team, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.
- Si se necesita información en otro idioma, comuníquese con 1-330-364-4474.

Section 4: Title VI Complaint Procedure

SOCIETY FOR EQUAL ACCESS/ILC's Title VI Complaint Procedure is made available in the following locations:

- ☐ Agency website at: Director: amears@seailc.org
 - ☐ Hard copy in the central office
 - ☐ Agency Title VI Plan
-

Any individual, group of individuals or entity that believes they have been discriminated against on the basis of race, color, or national origin by 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 Ohio Department of Transportation within ten (10) calendar days of receipt. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

SOCIETY FOR EQUAL ACCESS/ILC has 10 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 closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.
- ✓ A letter of finding (LOF) summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur.

If the complainant wishes to appeal the decision 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.

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 1-330-364-4474.

Section 5: Title VI Complaint Form

SOCIETY FOR EQUAL ACCESS/ILC's Title VI Complaint Procedure is made available in the following locations:

- ☐ Agency website, if available: www.seailc.org
- ☐ Hard copy in the central office
- ☐ Agency Title VI Plan

Section I:					
Name:					
Address:					
Telephone (Home):			Telephone (Work):		
Email Address:					
Accessible Requirements?	Format	Large Print		Audio Tape	
		TDD		Other	
Section II:					
Are you filing this complaint on your own behalf?				Yes*	No
*If you answered "yes" to this question, go to Section III.					
If not, please supply the name and relationship of the person for whom you are complaining:					
Please explain why you have filed for a third party:					
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.				Yes	No
Section III:					
I believe the discrimination I experienced was based on (check all that apply):					
<input type="checkbox"/> Race		<input type="checkbox"/> Color		<input type="checkbox"/> National Origin	
Date of Alleged Discrimination (Month Day, Year) _____					
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.					
Section IV					
Have you previously filed a Title VI complaint with this agency?				Yes	No
Section V					
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?					
<input type="checkbox"/> Yes		<input type="checkbox"/> No			
If yes, check all that apply:					

<input type="checkbox"/> Federal Agency: _____	
<input type="checkbox"/> Federal Court _____	<input type="checkbox"/> State Agency _____
<input type="checkbox"/> State Court _____	<input type="checkbox"/> Local Agency _____
Please provide information about a contact person at the agency/court where the complaint was filed.	
Name: _____	
Title: _____	
Agency: _____	
Address: _____	
Telephone: _____	
Section VI	
Name of agency complaint is against: _____	
Contact person: _____	
Title: _____	
Telephone number: _____	

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date required below

Signature

Date

If information is needed in another language, contact 1-330-364-4474.

Please submit this form to:

SOCIETY FOR EQUAL ACCESS/ILC
Executive Director Ada Mears
22 Bank Lane, Dover, Ohio 44622
330-343-3668
Director: amears@seailc.org

Section 6: List of Transit Related Title VI 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.

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

Section 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 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

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;
- (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.

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 95,000 residents in SOCIETY FOR EQUAL ACCESS/ILC's service area, 90.8% residents describe themselves as speaking English. People American 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 91% speak English. For these groups who speak English, 8% speak Spanish.

Tuscarawas – Languages Spoke at Home

	Total Number	Percent of Population	Total Population of County
Speak Language other than English	5760	6%	96,000
Speak English Less than Very Well	2880	3%	96,000
Spanish	5760	6%	96,000
Other Indo-European Languages	0	0%	96,000
Asian and Pacific Island Languages	0	0%	96,000
Other Languages	0	0%	96,000

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

Society for Equal Access /ILC assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. SEA provides approximately 15,000 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 Spanish 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.

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.
- 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 "I Speak" language cards (used to identify language preference).
- Documentation of language assistance requests.
- Use of web-based interpreter services (over the phone interpretation provider).
- How to handle a potential Title VI / LEP complaint.

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

If you need help with English, please call 1-330-364-4474

Si usted necesita ayuda con el inglés, por favor llame 1-330-364-4474

"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	Hmong
	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 Ngöô.	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
	Отметить этот флажок, если вы говорите по-русски	Russian
	Означите ову кућицу ако говорите српски	Serbian
	आपको हिंदी बोलने की आवश्यकता है तो इस बॉक्स में टिक करें	Hindi
	پر نشان لگائیں 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

Section 9: Minority Representation Information

Recipients that have **transit-related**, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

***Guidance:** Elected transit-related board, committee, or council, do not need to complete the table below, and write in section B that there are no non-elected transit-related boards, committees, or councils.

A. Minority Representation Table

Table Depicting Membership of Board, Committees, Councils, Broken Down by Race

Body	Caucasian	Hispanic	African American	Asian American	Native American	Two or More Races
Tuscarawas County	92.5%	1.76%	2.918	.362%	.7%	1.76%
Board of Directors SEA	8- 100%	0	0	0	0	0

Note: insert the number of people and % of total board membership

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?

☒ No, the agency does not have sub recipients.

Section 11: Title VI Equity Analysis for Facility Acquisition

Title 49 CFR, Appendix C, Section (3)(iv) requires “the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin.” For purposes of this requirement, “facilities” does not include bus shelters, as they are considered transit amenities. It also does not include transit stations, power substations, or any other project evaluated by the National Environmental Policy Act (NEPA) process. Facilities included in the provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. Has the agency built a facility? Check a response below.

☒ No, SOCIETY FOR EQUAL ACCESS/ILC has not built a facility.

Section 12: Fixed Route Transit Providers Service Standards and Policies

☒ SOCIETY FOR EQUAL ACCESS/ILC is not a fixed route transit provider. As such, the remainder of