



# **Medina County Public Transit**

## **Title VI Plan**

**January 2021**

## **Recipient Information**

Recipient: Medina County Public Transit

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## PROVISION OF TITLE VI ASSURANCES

Medina County Public Transit (MCPT) certifies that, as a condition of receiving Federal financial assistance under the Urban Mass Transportation Act of 1964, as amended, it will ensure that:

- A. MCPT will submit annually its Title VI Assurance as part of its annual Certification and Assurance submission to the Federal Transit Administration (FTA).
- B. No person, on the basis of race, color or national origin, will be subjected to discrimination in the level and quality of transportation services and transit related benefits provided by MCPT.
- C. MCPT will compile, maintain and submit in a timely manner Title VI information required by FTA Circular 4702.1A and in compliance with the Department of Transportation's (USDOT) Title VI Regulation, 49 CFR, and Part 21.7.
- D. MCPT will make it known to the public that any person or persons alleging discrimination on the basis of race, color or national origin as it relates to the provision of transportation services and transit-related benefits may file a complaint with the FTA or the USDOT.

## TITLE VI COMPLIANCE HISTORY

- A. There are no outstanding lawsuits or complaints naming MCPT alleging discrimination on the basis of race, color or national origin with respect to MCPT service and other transit-related benefits.
- B. There are no pending applications for Federal financial assistance and no Federal financial assistance being provided to MCPT other than that being provided by the FTA. Currently, MCPT receives assistance under Section 5307, Section 5339 and the Congestion Mitigation and Air Quality Program.
- C. During the last three years there have not been any civil rights compliance review activities conducted with respect to MCPT and, to the best of our knowledge, there are no ongoing civil rights compliance review activities being conducted with respect to MCPT.
- D. There are no current or pending MCPT construction projects that would negatively impact minority communities.

## CIVIL RIGHTS TITLE VI RULES THAT DO NOT PERTAIN TO MEDINA COUNTY PUBLIC TRANSIT

In chapter 3 section 4 the following sections do not apply to MCPT:

### **Part 6:**

- Medina County Public Transit is a department of Medina County Ohio, governed by the Medina County Commissioners. MCPT is also influenced by the Transit Advisory Consortium that assists in policy making for transit concerns. This group is made up of the human services groups in Medina County that MCPT services. Neither group is determined by a racial breakdown.

### **Part 7:**

- MCPT has no sub recipient that would follow Title VI criteria.

### **Part 8:**

- MCPT constructed a new transit facility that was completed in January of 2012. There are no plans to do any further construction in the near future.

## TITLE VI COMPLAIN PROCEDURE

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the **Medina County Public Transit** (hereinafter referred to as "**the System**") may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. **The Medina County Public Transit System** investigates complaints received no more than 180 days after the alleged incident. **The System** will process complaints that are complete.

Once the complaint is received, **the System** will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

**The System** has **45** days to investigate the complaint. If more information is needed to resolve the case, **the System** may contact the complainant. The complainant has **30** 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 **30** business days, **the System** can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

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

occur. If the complainant wishes to appeal the decision, she/he has **30** days after the date of the letter or the LOF to do so.

Upon completion the complaint form should be mailed or brought to the **Medina County Public Transit Office at 6094 Wedgewood, Medina, Ohio** to the **attention of: Hank Lemasters, Operations Supervisor.**

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

## **YOUR RIGHTS UNDER TITLE VI OF THE CIVIL RIGHTS ACT OF 1964**

Medina County Public Transit (MCPT) operates its programs and services without regard to race, color or national origin in accordance with Title VI of the Civil Rights Act of 1964 which 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, on the grounds 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.”

Medina County Public Transit is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services as provided by Title VI. Any individual who feels he or she has been aggrieved by any discriminatory practice as set forth under Title VI may file a complaint with Medina County Public Transit (MCPT).

For more information on the Medina County Public Transit civil rights program, and the procedures to file a complaint, call 330-723-9670/TDD 800-750-0750; email [ahooser@medinaco.org](mailto:ahooser@medinaco.org) or visit our office at 6094 Wedgewood, Medina, Ohio 44256.

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

If information is needed in another language contact 800-555-1212.

## **PARTICIPATION PLAN**

### **SUBJECT:**

Although Medina County Public Transit has not experienced an encounter with an individual with LEP, it is understood that the potential still exists for increased frequency. Based on the most recent 2011 census data, the second most utilized language in Medina County at a 1.7% usage is Spanish and MCPT is aware that it may be necessary to provide alternate information

in this language; however, we will also keep in mind that there were other languages identified in the census of which there is a potential for contact.

**PURPOSE:**

To provide guidance regarding public participation in the transportation decision making process to all populations residing in Medina County.

**AUTHORITY:**

Title VI of the Civil Rights Act of 1964, and FTA Circular 4702.1B.

**SCOPE:**

Medina County Public Transit has adopted this plan to insure the public, including Medina County's minority, low-income, disabled and LEP populations are informed about the public transportation program and have the opportunity to participate in making decisions regarding Medina County's public transit service.

**INTRODUCTION:**

Medina County Public Transit operates deviated fixed routes and an on demand response public transit service within the geographical boundaries of Medina County. The Medina County Public Transit (MCPT) office is located at 6094 Wedgewood in Medina County, Ohio, 44256. The total population of Medina County is estimated at 173,262. The City of Brunswick population is 33,388, the City of Medina population is 25,139 and Wadsworth which is the third largest city in the county has a population of 18,437. Several townships and villages are also served by the Medina County Public Transit system. Of the 173,262 people who live in Medina County 13.5% are over 65 years of age and 96.3 % are white. The balance of the population is 1.7% Hispanic or Latino, 1.4% Black, 0.1% American Indian, and 1.0% Asian. There are 4.2 % people living throughout the county who speak a language other than English at home but there is no one in Medina County, per the census, who does not speak English at all. Estimated percentages of those living below the poverty level in Medina County are 11.5%.

Medina is the county seat and all county offices are located in Medina as are many of the county's social service agencies including Department of Job and Family Services (DJFS) and the Office for Older Adults. Most county residents obtain healthcare from providers in Medina County or travel to Cleveland and Akron for health care.

**PUBLIC PARTICIPATION AND OUTREACH EFFORTS:**

- Medina County Public Transit includes information pertaining to LEP in any conducted surveys, with information disseminated through county human service

agencies, through notices posted on MCPT buses, in our brochures and on our proposed website.

- MCPT reviews the LEP plan on an annual basis. This review includes staff training on the LEP policy and procedures to ensure everyone at MCPT knows how to efficiently handle any experience or communication barrier that may arise.
- Outreach occurs through public hearings when service changes, fare changes or changes in daily operations are proposed, during human services transportation planning processes or whenever an applicable planning process is in progress.
- Notification of proposed public meetings are advertised in the manner deemed most appropriate to reach target audiences and notices include the availability of accommodations for accessibility or interpretation services with 30 day advanced notice.
- The Medina County Transit Consortium meets on a monthly basis and is open to the public to attend. It is advertised with the Commissioner's Agenda in the local newspapers.
- The Medina County Transit Consortium includes representation from Medina County human service agencies, city and county government agencies and clients of these agencies. Membership is on a volunteer basis and when a member steps down from the Consortium the agencies inform clients of an opening.

## **FIXED ROUTE SERVICE STANDARDS POLICY**

### **Vehicle Load Standards:**

Medina County Public Transit (MCPT) has four fixed routes. These local fixed bus routes. MCPT services this service with 16 passenger light transit vehicles. The average of the load during peak operation period should not exceed 18 passengers with a maximum load factor of 1.2.

### **Vehicle Headway Standards:**

MCPT operates three routes. Medina loop runs from 6:00 am - 6:00 pm Monday – Friday with 120 minutes headway through the entire day. On Saturday Medina loop runs from 10:00 am - 5:00 pm with 120 minutes headway the entire day. The Wadsworth loop runs from 6:00 am - 6:00 pm Monday – Friday with 90 minute headway for the entire day. On Saturdays the Wadsworth loop runs from 10:00 am - 5:00 pm with 90 minutes headway. MCPT does not offer service on Sundays.

**On Time Performance Standards:**

A vehicle is considered on time if it departs a scheduled time point no more than one minute early and no more than five minutes late in comparison to the posted schedule. MCPT on time performance objective is 90% or greater.

**Service Availability Standards:**

Evaluation and determination of establishment of routes was accomplished by surveys and based on the most pressing needs of the community. The information gathered from the surveys helped in determining population concentrations and the destinations of those individuals who would use the service.

**Distribution of Transit Amenities:**

MCPT is a department in the County of Medina Ohio and final policies are authorized and a resolution is made by the Medina County Board of Commissioners. As the Director of Transit I recommend polices to the board regarding the distribution of transit amenities for the fixed route mode of service. The fixed routes began on January 6, 2014 and are currently flag stop routes. Evaluation of the routes and recommendations for bus stops and bus shelters will be accomplished in the spring of 2015. The associated cost of placement and maintenance of shelters allows for only a limited amount of shelters to be provided so the criteria for placement will be based on areas of highest ridership and need to provide seating and protection from bad weather and is particularly important to senior citizens and persons with disabilities. Evaluation of bus stop signage will be based on areas where the largest numbers of passengers board.

**Vehicle Assignment:**

Vehicles will be assigned to the fixed route bus service by two standards: (1) the newest vehicles and (2) the lowest mileage vehicles in the MCPT fleet which will be used on these routes.

**LIMITED ENGLISH PROFICIENCY PLAN (LEP)**

**SUBJECT**

Providing Language Assistance to Persons with Limited English Proficiency (LEP)

**I. PURPOSE**

The purpose of this Limited English Proficiency plan is to provide assurances and demonstrate that customers of Medina County Public Transit are being provided meaningful access to

program information, benefits and services although the clients may be limited in their English language proficiency. Meaningful access involves Medina County Public Transit (MCPT) promoting effective communication to LEP individuals seeking or receiving services, benefits or participation in programs funded in whole or in part by federal monies. This plan specifically provides necessary assurances and identifies tools being used to effectuate this policy.

## **II. AUTHORITY**

Executive Order 13166, Title VI of the Civil Rights Act of 1964, and the Title VI regulations regarding language access.

## **III. LEP POPULATION**

Medina County Public Transit (MCPT) has determined through the Medina County Department of Job and Family Services that the language(s) other than English that is/are most likely to be encountered by employees of MCPT is/are Spanish, Chinese, Mandarin, Russian, Japanese, Laotian, Hmong, Vietnamese and Indian. The methodology used to make this determination is as follows: Counter agency encounters. Any LEP language group that comprises at least 5% or 1,000 individuals whichever is less, of persons eligible for or likely to be affected by the transit services must be included as one of the county languages. Medina County Public Transit will periodically monitor the LEP population of those served or those who could be served by MCPT. If it is determined that other LEP language groups are seeking transportation services or are potentially eligible to receive services with the Medina County Public Transit, MCPT will adjust its methods and services to serve the new population accordingly. Any new LEP populations will be reflected in the LEP plan.

## **IV. FREQUENCY WITH WHICH LEP POPULATIONS COME IN CONTACT WITH MEDINA COUNTY PUBLIC TRANSIT**

Medina County Public Transit has a very small population of clients who qualify as LEP. Within the last three years the management and staff of Medina County Public Transit has had interaction with one client (Spanish speaking) that is of the LEP population.\* Please see Attachment A for LEP populations encountered in Medina County in 2012.

## **V. LANGUAGE ASSISTANCE MEASURES**

Medina County Public Transit does not currently have staff that can provide interpretation or translation of printed materials for persons who are non - English speaking and need language assistance. Assistance free of charge may be obtained from the Medina County Department of Jobs and Family Services by contacting their Human Resources Manager at 330-722-9300. For additional information and assistance please see Attachment B for available translator services that are available for a fee.

Individuals with LEP have the right to utilize informal interpreters, including those from outside resources, of their choice and at their own expense, in lieu of the free assistance offered

through the Department of Jobs and Family Services. “Informal interpreters” and “outside resources” are defined directly below:

- a. Informal Interpreters -- Informal interpreters may include family members, friends, legal guardians, service representatives or advocates of the LEP client.
- b. Outside Resources -- Qualified outside resources may include community volunteers, fellow passengers or university students.

**VI. LEP PLAN APPROVAL**

- 1. The LEP Plan will be approved by the Medina County Public Transit Advisory Consortium (TAC).
- 2. The LEP Plan shall be reviewed and updated no less than annually by the Medina County Public Transit Advisory Consortium (TAC). All updates/revisions will be formally approved by the Medina County Public Transit Advisory Consortium (TAC).
- 3. The approved LEP Plan will contain the approval date as well as the date of the most recently-adopted revisions.

**VII. LEP PLAN DISTRIBUTION AND TRAINING**

- 1. Staff likely to come into contact with persons with LEP: The scenarios contained in the table below are not all inclusive. However, they are anticipated to be most representative of when likely LEP encounters might occur as well as the expected point of contact.

**Staff Most Likely to Have a LEP Encounter**

Staff	Anticipated Point of Contact
MCPT Scheduler	When a person schedules a trip
MCPT Director	If a client/passenger has questions/concerns about system operations or the service provided
MCPT Dispatcher or Supervisor	When a passenger seeks information about the transit system
MCPT Operations Supervisor	At the time an individual wishes to make a complaint
MCPT Bus Driver	If a client/passenger has questions while riding on an MCPT bus

2. LEP Training for Staff: The LEP plan will be:
  - Information distributed to all MCPT staff
  - Posted on the Medina County Public Transit website, \_\_\_\_\_
  - Explained in information distributed to the MCPT staff who might encounter LEP clients utilizing the Medina County Public Transit.
  - Make updates and changes available to MCPT administration staff as revisions/updates to the LEP Plan occurs.

#### **VIII. PROVIDING NOTICE TO LEP PERSONS**

Public hearing notices currently include the following statement. “Those individuals who are non-English speaking and require an interpreter should contact the Medina County Jobs and Family Services office Human Resources Manager at least 48 hours prior to the public hearing to receive interpretation assistance”.

#### **IX. MONITORING**

The Medina County Public Transit will utilize the Transit Advisory Consortium (TAC) to review the plan annually--prior to the grant submission process. The review will include:

1. An annual report indicating the number of passengers with LEP encountered during the one-year period. The report should include the number and types of requests received, the various languages encountered, costs, etc.
2. The Medina County Public Transit will obtain feedback, annually, on the LEP Plan. Consultations will be conducted with community organizations representing LEP persons as well as the staff responsible for providing language assistance.
3. The Medina County Public Transit will consider making changes to the LEP Plan based upon the feedback received. Associated costs and resources available to implement changes will be taken into consideration. Depending upon the evaluation, MCPT may choose to expand the language measures that are particularly effective or modify or eliminate those which have not been effective.

**X. MEDINA COUNTY LEP PERSONS SERVED OR ENCOUNTERED 2020**

<u>AGENCY</u>	<u>NUMBER</u>	<u>LANGUAGE SPOKEN</u>
Brunswick Schools	0	Not Applicable
Bureau of Vocational Rehabilitation	0	Not Applicable
Department of Jobs and Family Services	0	Spanish
Goodwill	0	Not Applicable
Medina County Kidney Foundation	0	Not Applicable
Office for Older Adults	0	Asian
HSC/The Arc of Medina	0	Not Applicable
Veterans Services	0	Not Applicable

**XI. TRANSLATOR SERVICES CURRENTLY AVAILABLE**

Translation & Interpretation Services

Asian Services in Action, Inc.

730 Carroll Street

Akron, Ohio 44304

Contact: Ching,Lo

330-535-3263 (ext.5323)

International Institute of Akron

207 East Tallmadge Avenue

Akron, Ohio 44310-3298

Contact: Hsathablay

330-376-5106 (ext.126)

Contact: Bhim

330-376-5106 (ext.125)

Medina County Board of Education

124 W Washington St #1B

Medina OH, 44256

330-723-6393

**CONTACTS WITHIN THE MEDINA COMMUNITY**

The following individuals are teachers who will give assistance in an emergency:

Spanish: Amy Simarro  
 Cloverleaf High School teacher 330-948-2500

French: Jacque Neidig  
 Cloverleaf High School – Dept. Chair 330-948-2500

**LIST OF INVESTIGATIONS, LAWSUITS AND COMPLAINTS**

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
<b>Investigations</b>				
1.	None	n/a	n/a	n/a
2.				
<b>Lawsuits</b>	None	n/a	n/a	n/a
1.				
2.				
<b>Complaints</b>	None	n/a	n/a	n/a
1.				
2.				

Medina County Public Transit is not involved in any Title VI investigations, complaints, or lawsuits filed with the transit system since the time of the last grant submission pertaining to allegations of discrimination on the basis of race, color and/or national origin in transit related programs or activities.



## TITLE VI COMPLAINT FORM

<b>Section I:</b>				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Electronic Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
<b>Section II:</b>				
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
<b>Section III:</b>				
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.				
_____				
_____				
<b>Section IV</b>				
Have you previously filed a Title VI complaint with this agency?			Yes	No

