

**Morrow County**  
**Area Transit**  
(Herein referred to as “MCAT”)

**Title VI Plan**

**Adopted: January 1, 2019**

# I. INTRODUCTION

---

## MCAT'S COMMITMENT TO CIVIL RIGHTS

This update of MCAT Transit's Title VI Program has been prepared to ensure that the level and quality of MCAT's deviated route/demand response services are provided in a nondiscriminatory manner and that the opportunity for full and fair participation is offered to MCAT's riders and other community members. Additionally, through this program, MCAT has examined the need for services and materials for persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English.

While it is a matter of principle that MCAT is committed to ensuring that no person is excluded from participation in, or denied the benefits of, or subjected to discrimination in the receipt of any of MCAT's services on the basis of race, color or national origin, the contents of this program have been prepared in accordance with Section 601 of Title VI of the Civil Rights Act of 1964 and Executive Order 13116 (Improving Access to Services for Persons with Limited English Proficiency).

*"No person shall, on 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 assistance." - Civil Rights Act of 1964*

Under the Civil Rights Act of 1964, and as a recipient of federal funding under the programs of the Federal Transit Administration (FTA) of the U.S. Department of Transportation (US DOT), MCAT has an obligation to ensure that:

- ◆ The benefits of its bus services are shared equitably throughout the service area;
- ◆ The level and quality of bus services are sufficient to provide equal access to all riders in its service area;
- ◆ No one is precluded from participating in MCAT's service planning and development process;
- ◆ Decisions regarding service changes or facility locations are made without regard to race, color or national origin and that development and urban renewal benefitting a community as a whole not be unjustifiably purchased through the disproportionate allocation of its adverse environmental and health burdens on the community's minority population; and
- ◆ A program is in place for correcting any discrimination, whether intentional or unintentional.

## II. GENERAL REQUIREMENTS

### **Notice to the Public**

To make MCAT riders aware of its commitment to Title VI compliance, and their right to file a civil rights complaint, MCAT has presented the following information on its website, rider guides, onboard vehicles, and posted at office centers.

### ***Your Civil Rights***

*Morrow Count Area Transit (MCAT) operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes they have been aggrieved by any unlawful discriminatory practice under Title IV may file a complaint with MCAT. For more information on MCAT's civil rights program and the procedures to file a complaint, please contact Sundie Brown by phone at 419-949-2606, by email at [Sundie.Brown@jfs.ohio.gov](mailto:Sundie.Brown@jfs.ohio.gov) or visit our administrative office at 619 West Marion Road, Mt Gilead, Ohio 43338 from 8:00am to 4:00pm. For more information about MCAT programs and services, visit [CMMMobility.org](http://CMMMobility.org). If information is needed in another language, please contact MCAT at 419-864-3500.*

### **Discrimination Complaint Procedures**

MCAT has established a process for riders to file a complaint under Title VI. Any person who believes that she or he has been discriminated against on the basis of race, color, or national origin by MCAT may file a Title VI complaint by completing and submitting the agency's Title VI Complaint. The form can be attained by any of the following methods:

Stop in at our administrative office: Director's Office, 619 W Marion Rd, Mt Gilead, Ohio 4338

Stop in at our physical location: MCAT, 4565 Co Rd 9, Cardington, Ohio 43315

Email any of the following, requesting a copy of the form be electronically sent:

Sundie Brown, Director & Title VI Coordinator, [Sundie.Brown@JFS.Ohio.Gov](mailto:Sundie.Brown@JFS.Ohio.Gov)

Carrie Watson, Transportation Coordinator, [MCTCCoordinator@MorrowCountyOhio.Gov](mailto:MCTCCoordinator@MorrowCountyOhio.Gov)

Tim Maceyko, Mobility Manager, [MobilityManager@MorrowCountyOhio.gov](mailto:MobilityManager@MorrowCountyOhio.gov)

## Title VI Complaint Form

*[The page contains several horizontal blacked-out redaction bars.]*

**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?

[ ] 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:
<b>Section VI</b>
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

You may submit this form in person at:

Director's Office

619 W Marion Rd.

Mt Gilead, Ohio 43338

Or

You may mail this form to:

Title VI Coordinator

619 W Marion Rd.

Mt Gilead, Ohio 43338

---

## **The Procedure**

If you believe that you have received discriminatory treatment by the MCAT on the basis of race, color or national origin, you have the right to file a complaint with the Title VI Coordinator, Sundie Brown.

### **Methods of filing a complaint:**

Complete the Complaint Form, and send it to:

Director & Title VI Coordinator Sundie Brown, 619 West Marion Rd, Mt Gilead, Ohio 43338

Verbal complaints are accepted and transcribed by Carrie Watson. To make a verbal complaint, call 419-864-3500 and ask for Carrie Watson, Transportation Coordinator.

MCAT investigates complaints received no more than sixty days after the alleged incident. MCAT will process complaints that are complete. Once the complaint is received, MCAT will review it and the complainant will receive an acknowledgement letter informing them whether the complaint will be investigated by MCAT.

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

If MCAT's investigator is not contacted by the complainant or does not receive the additional Information within thirty days, MCAT 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, one of two letters will be issued to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.

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

Washington, DC 20590

As of the writing of this program, there are 0 complaints pending which allege discrimination on the grounds of race, color, national origin or any other form of discrimination.

[illegible]



### **III. MCAT'S PUBLIC PARTICIPATION PLAN**

#### **Key Principles**

MCAT's Public Participation Plan (PPP) has been prepared to ensure that no one is precluded from participating in MCAT's service planning and development process. It ensures that:

- Potentially affected community members will have an appropriate opportunity to participate in decisions about a proposed activity that will affect their environment and/or health;
- The public's contribution can and will influence MCAT's decision making;
- The concerns of all participants involved will be considered in the decision-making process; and,
- MCAT will seek out and facilitate the involvement of those potentially affected.

Through an open public process, MCAT has developed a public participation plan to encourage and guide public involvement efforts and enhance access to MCAT's transportation decision-making process by minority and Limited English Proficient (LEP) populations. The public participation plan describes the overall goals, guiding principles and outreach methods that MCAT uses to reach its riders.

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. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all.

#### **Limited English Proficient (LEP) Goals of the Public Participation Plan**

The overarching goals of MCAT's PPP include:

- Clarity in Potential for Influence - The process clearly identifies and communicates where and how participants can have influence and direct impact on decision making.
- Consistent Commitment - MCAT communicates regularly, develops trust with riders and our community and builds community capacity to provide public input.
- Diversity - Participants represent a range of socioeconomic, ethnic and cultural perspectives, with representative participants including residents from low-income neighborhoods, ethnic communities and residents with Limited English Proficiency

- Accessibility - Every reasonable effort is made to ensure that opportunities to participate are physically, geographically, temporally, linguistically, and culturally accessible.
- Relevance - Issues are framed in such a way that the significance and potential effect is understood by participants.
- Participant Satisfaction - People who take the time to participate feel it is worth the effort to join the discussion and provide feedback.
- Partnerships - MCAT develops and maintains partnerships with communities through the methods described in its public participation plan.
- Quality Input and Participation - That comments received by MCAT are useful, relevant and constructive, contributing to better plans, projects, strategies and decisions.

### Objectives of the Public Participation Plan

MCAT's Public Participation Plan is based on the following principles:

- Flexibility - The engagement process will accommodate participation in a variety of ways and be adjusted as needed.
- Inclusiveness - MCAT will proactively reach out to and engage low income, minority and LEP populations from the MCAT service area.
- Respect - All feedback will be given careful and respectful consideration.
- Proactive and Timeliness - Participation methods will allow for early involvement and be ongoing.
- Clear, Focused and Understandable - Participation methods will have a clear purpose and use for the input, and will be described in language that is easy to understand.
- Honest and Transparent - Information provided will be accurate, trustworthy and complete.
- Responsiveness – MCAT will respond and incorporate appropriate public comments into transportation decisions.
- Accessibility – Meetings will be held in locations which are fully accessible and welcoming to all area residents, including, but not limited to, low-income and minority members of the public and in locations relevant to the topics being presented and discussed.

MCAT will use its public participation plan when considering all fare changes, major modifications to routes and schedules, and other transit planning projects when:

- A fare increase/decrease or significant change in the method of fare payment is being considered;

- Advance reservation policy is reduced or increased;
- Area for deviating to pick up passengers is changed;
- A new route is established;
- An existing route is proposed for elimination;
- Considering the total discontinuance of service on any line or group of lines on any given day when service is currently offered;
- Any system-wide change in service hours that exceeds (plus or minus) 10% of current total service hours;
- Schedules are changed on any given route or group of routes that reduces the total number of one-way bus trips by more than 25% of the current number of bus trips.
- For minor schedule and service changes not rising to the level of those above, MCAT will post service change notices on appropriate buses and stops sixty days in advance of the change date.

#### IV. MCAT'S PUBLIC PARTICIPATION PROCESS

##### Outreach Efforts – Alerting Riders and Encouraging Engagement

MCAT's PPP includes many new mediums extending beyond the traditional approach which relied on legal notices and intermittent media coverage. While MCAT maintains these elements to its outreach program along with traditional seat-drop flyers, MCAT has availed itself of the communication methods more widely used by members of our community and riders.

While there may be minor variation in the outreach process from time-to-time, the outline below provides the general steps for engaging riders in the decision-making process using a fare or service change as an example.

1. A service/fare change proposal is developed internally or as a result of public comment;
2. An internal review by the appropriate committees is conducted (for example, MCAT's Service Review Committee, detailed later in this program, will review all service change proposals);
3. Proposals are reviewed by MCAT's Passenger Advisory Committee (PAC);
4. A Title VI review of the proposal is conducted;
5. If required, authorization from the MCAT Board of Commissioners is sought to proceed to a public comment period;
6. Public outreach venues, dates and times are determined with consideration of the proposed changes and their impact on specific locations/populations within the MCAT service area;
7. Bilingual (English and Spanish) public outreach materials and a program are developed;
8. Outreach in advance of public information sessions is released (using tool-box of mediums listed below);
  1. An Email is transmitted to MCAT community partners;

2. Print ad(s) are put in the local paper;
3. Social Media notifications are made;
4. The public comment period ends;
5. The final service/fare change date is set;
6. Outreach is conducted in advance of any service or fare change;
7. Bilingual system timetable and website updated in advance of the proposed change.

### Selection of Meeting Locations

When determining locations and schedules for public meetings, MCAT will:

- Schedule meetings at times and locations that are convenient and accessible for minority and LEP communities;
- Employ different meeting sizes and formats including town hall type meeting formats;
- Coordinate with community organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities;
- Consider radio, television, or newspaper ads as well as podcasts that serve LEP populations.
- Provide opportunities for public participation through means other than written communication, such as one-on-one interviews or use of audio or video recording devices to capture oral comments.

### MCAT Mediums

- Print – Newspapers and other periodicals
- Outdoor – Advertising on-board vehicles (interior and/or exterior)
- Website
- Web-Based Feedback - How Are We Doing, Surveys
- Social Media – MCAT has used Facebook since 2016 to help engage community
- Email – MCAT sends out Email Blasts for anyone requesting to be part of the email list
- Seat Drops, On-board Flyers – MCAT regularly uses seat drops and flyers to provide riders with details of service changes and schedules of public meetings and hearings.
- Direct Mail to Community Partners
- Public Information Sessions
- Public Hearings
- Legal Notices

### Addressing Comments

### **The Incorporation of Public Comments into Decisions**

All comments received through the public participation plan are given careful, thoughtful consideration. Because there are a number of different ways riders or members of the community can comment on proposed service or fare changes (mail, email, social media, public meetings and others), all comments are assembled into a single document for presentation to the MCAT Board for consideration.

### **Identification of Stakeholders**

#### **Our Community Partners**

Stakeholders are those who are either directly or indirectly affected by a plan, or the recommendations of the plan. Those who may be adversely affected, or who may be denied benefits of a plan's recommendation(s), are of particular interest in the identification of specific stakeholders. Stakeholders can come from a number of groups including general citizens/residents, minority and low-income persons, public agencies, and private organizations and businesses. While stakeholders may vary based on the plan or program being considered, MCAT has assembled a listing of stakeholders with whom we regularly communicate through email and direct mail. A complete list of MCAT's community stakeholders can be obtained by contacting MCAT.

#### **Stakeholder List**

Any community organization or person can be added to the MCAT stakeholder list and receive regular communications regarding service changes by contacting the MCAT office at 419-864-3500. Local organizations and businesses can also request that a speaker from MCAT attend their regular meeting at the same number or through the CMMMobility.org website.

### **V. Decision Making Bodies**

#### **Committees and Councils**

At MCAT, decisions regarding policy, service changes, fares, capital programming and facility locations are made by the Morrow County Board of Commissioners with recommendations by the Transit Advisory Board, Safety & Service Review Committee, and the Passenger Advisory Committee. The Board of Commissioners is composed of three elected officials.

Meetings of the Morrow County Board of Commissioners, the Transit Advisory Committee, and the MCAT Passenger Advisory Committee are always open to the public. The Morrow County Board of

Commissioners holds regular and publicized meetings that are open to the public. The MCAT Transit Advisory Board and the Passenger Advisory Committee meetings are also open to the public and are typically held at 619 W Marion Rd, Mt Gilead, Ohio. The Passenger Advisory Committee meetings will involve notifications being put in the local paper, dates and times added to the website calendar, and email blasts may be sent. The Safety & Service Committee meetings are for internal purposes and are not open to the public.

### **Transit Advisory Committee**

The Transit Advisory Committee (TAC) is composed of MCAT staff, community stakeholders, passengers, and others who support transit in the community.

It meets regularly to discuss possible safety improvements, trainings, and other pertinent safety-related issues. It also reviews current service offerings and suggests any service modifications from the perspective of the drivers and/or other front-line staff.

There are required members and positions to be filled that meets the Safety Manual requirements, but there is also an additional voluntary membership component that is open-ended (i.e. members are not appointed and they may serve for as long as they desire) and changes from time to time.

### **Safety & Service Review Committee**

This employee-based internal committee is comprised of supervisors, drivers, office staff, mechanics and/or trainers.

It meets regularly to discuss possible safety improvements, trainings, and other pertinent safety-related issues. It also reviews current service offerings and suggest any service modifications from the perspective of the drivers and/or other front-line staff.

There are required members and positions to be filled that meets the Safety Manual requirements, but there is also an additional voluntary membership component that is open-ended (i.e. members are not appointed and they may serve for as long as they desire) and changes from time to time.

### **Passenger Advisory Committee (PAC)**

This committee is open to the public and comprised of passengers representing various segments of those that are served.

At these quarterly meetings, members discuss all aspects of MCAT's services from the perspective of the public. This group offers an invaluable service to MCAT. Membership is voluntary and open-ended (i.e. members are not appointed and they may serve for as long as they desire) and it changes from time to time. This group will begin meetings in 2019.

Body	Caucasian	African American	Hispanic	Other	Disabled	Senior	Low-Income
------	-----------	------------------	----------	-------	----------	--------	------------

<b>Board of Commissioners</b>							
<b>Transit Advisory Committee</b>							
<b>Safety &amp; Service Review Committee</b>							
<b>Passenger Advisory Committee</b>							

## VI. SERVICE STANDARDS AND POLICIES

MCAT has developed a set of quantifiable service standards and policies. These service standards shall be updated in 2020 through a public participations process, shall be approved by MCAT's Board of Commissioners and done so with the input of MCAT's Passenger Advisory Committee (PAC).

These service standards and policies shall include:

- ◆ Vehicle Load
- ◆ On-time Performance (Schedule Adherence)
- ◆ Vehicle Assignment Policy
- ◆ Transit Amenity Policy

Following the internal updating of these policies and standards, MCAT will advertise and shall hold a public information session to receive comments on the proposed standards. During the session, MCAT staff will present an overview of the components of MCAT's public participation process as well as the various policies and standards. A copy of the presentation will be made available by contacting MCAT.

### **Vehicle Load**

Vehicle load is expressed as the ratio of passengers to the total number of seats on a vehicle.

Vehicle Type	Seated Capacity	Standing Capacity	Total Capacity	Preferred	Average Load	Maximum Load
Ex: New Flyer 35'	29	20	49	1	1.5	2
Ex: Ford 25'	20	8	24	1	1.5	2


**On-Time Performance**

Among the most important service standard for riders is on-time performance or adherence to published schedules.

- A vehicle is considered on time if it departs a scheduled time point no more than five minutes early and no more than 5 minutes late.
- MCAT’s on-time performance objective is 90% or greater.

**Vehicle Assignment Policy**

Vehicle assignments consider the operating characteristics of vehicles of various sizes, lengths and capacities, which are matched to the operating characteristics required to meet each day’s need.

**VII. SUMMARY OF CHANGES**

**Service Change Evaluations Since 2018**



The MCAT Title VI Plan is being submitted for adoption to be effective officially on January 1, 2019. This plan is an upgrade and adheres to the expectations for a Public Transit Agency.

To view the plan and any changes, the associated outreach and Title VI determination and MCAT Board Approval are available by contacting MCAT.

### **Program Specific Requirements**

#### **Title VI Monitoring** (Prior to the 2019 Title VI Plan Adoption)

The results of any previous monitoring of service standards for MCAT, prior to the adoption of the 2019 Title VI Plan, can be obtained by contacting MCAT.

#### **Subrecipient Compliance**

This is a new plan, but there has been no input or subrecipient compliance concerns in the past for MCAT.

#### **Equity Analysis for Facility**

Vehicles are all currently stored at the MCAT physical location of 4565 County Road 9, Cardington, Ohio 43315. The lot is secured and fully enclosed by 6' high chain link fencing. Security lighting has been strategically placed on the lot as well as security cameras.

#### **Demographic Service Profile**

Because MCAT operates fewer than 50 buses in peak service, a demographic service profile was not prepared for this plan update.

## **VIII. GRANTS, REVIEWS AND CERTIFICATIONS**

#### **Pending Applications for Financial Assistance**

An application was submitted for 5311 grant funding for the 2019 year and this plan's adoption shall coincide with the funding cycle.

#### **Civil Rights Compliance Reviews in the Past 3 Years**

MCAT has not been the subject of any such reviews since its 2019 submission, nor in the previous three-year period.

### **Recent Annual Certifications and Assurances**

MCAT executed its most recent Certifications and Assurances to the FTA in October of 2018 and this was submitted in connection with the 2019 5311 grant application documents.

### **Contact**

For additional information on the MCAT Title VI Plan, or its efforts to comply with the Civil Rights Act of 1964 or Executive Order 13166 Improving Access to Services for Persons with Limited English Proficiency, please contact:

Sundie Brown, MCTC Director & Title VI Coordinator

619 W Marion Rd, Mt Gilead, Ohio 43338

Email : [Sundie.Brown@jfs.ohio.gov](mailto:Sundie.Brown@jfs.ohio.gov)

## **IX. LANGUAGE ASSISTANCE PLAN**

### **Improving Access for People with Limited English Proficiency (LEP)**

In order to ensure meaningful access to programs and activities, MCAT uses the information obtained in a Four Factor Analysis to determine the specific language services that are appropriate. This analysis helps MCAT to determine if it communicates effectively with LEP persons and informs language access planning.

The Four Factor Analysis is a local assessment that considers:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by MCAT;
2. The frequency with which LEP persons come into contact with MCAT services and programs;
3. The nature and importance of MCAT's services and programs in people's lives; and
4. The resources available to MCAT for LEP outreach, as well as the costs associated with that outreach.

#### **Factor 1 – Number of LEP Persons in Service Region**

The first step in determining the appropriate components of a Language Assistance Plan is understanding the proportion of LEP persons who may encounter MCAT's services, their literacy skills in English and their native language, the location of their communities and neighborhoods and, more importantly, if any are underserved as a result of a language barrier.

To do this, MCAT evaluated the level of English literacy and to what degree people in its service area speak a language other than English and what those languages are. Data for this review is derived from the United States Census and the American Community Survey. Data was reviewed by MCAT's [board, advisory committee, city leaders] in its entirety.

#### **Service Area Overview**

MCAT's service area encompasses approximately 406 square miles of Morrow County and is home to a population speaking more than 4 different languages. Of the total service area population, (34,827), 0.008% of residents report speaking English less than very well. The most populous groups in the

category are shown below. Of the remaining populations, those reporting English “less than very well” range from 0.0003% to 0.007% of the total service area population.

Speak English “Less than very well”	Population in the Language Group	Percent of Total Population
Spanish	32	0.0009%
Asian and Pacific Island Languages	11	0.0003%
Other Indo-European Languages	251	0.007%

## Factor 2 – Frequency of LEP Use

There are a large number of places where MCAT riders and members of the LEP population can come into contact with MCAT services including the use of deviated route and demand response vehicles, calls to customer service representatives, reservation agents and MCAT’s outreach materials. An important part of the development of MCAT’s Language Access Plan is the assessment of major points of contact, including:

- The use of the vehicle service (on-board signage, announcements and driver language skills);
- Communication with MCAT’s customer service staff;
- Pass sales;
- Printed outreach materials;
- Web-based outreach materials;
- Public meetings;
- Demand response reservation agents;
- Local news media (print and radio);

MCAT distributed a language survey to its employees. The objective of the survey was to evaluate the needs of MCAT customers who are not able to communicate in English. The first question asked, In What way(s) do you interact with MCAT riders? The chart below illustrates the results.

Method of Interaction	Percent of Responses
Telephone	71%
Face to Face	93%
Email	0%
Fax	0%

Next, the survey asked how often employees come into contact with LEP customers. The chart below outlines the results.

Frequency of Interaction	Percent of Responses
Often	0%
Sometimes	7%
Rarely	21%
Never	72%

Next, the survey asked employees to identify how often they interact with the following languages on a typical workday.

Language	Percent of Interactions
Spanish	7%
Chinese	0%
Other	0%

The survey asked, overall, how effective employees are in communicating with Limited English Proficient ABC passengers. The results are summarized below.

Effectiveness	Percent of Total Responses
Very Effective	7%
Moderately Effective	64%
Less Effective	22%
Unable to Communicate	7%

### Community Partners

MCAT also canvassed its community partners to assess the extent to which they came into contact with LEP populations. Community partners were asked the following questions:

1. Do you encounter non-English speaking/reading people who need your services?
2. If so, what are the top three languages that you encounter?
3. How do you address language barriers?

4. Do you find language to be a barrier in preventing you from providing service?

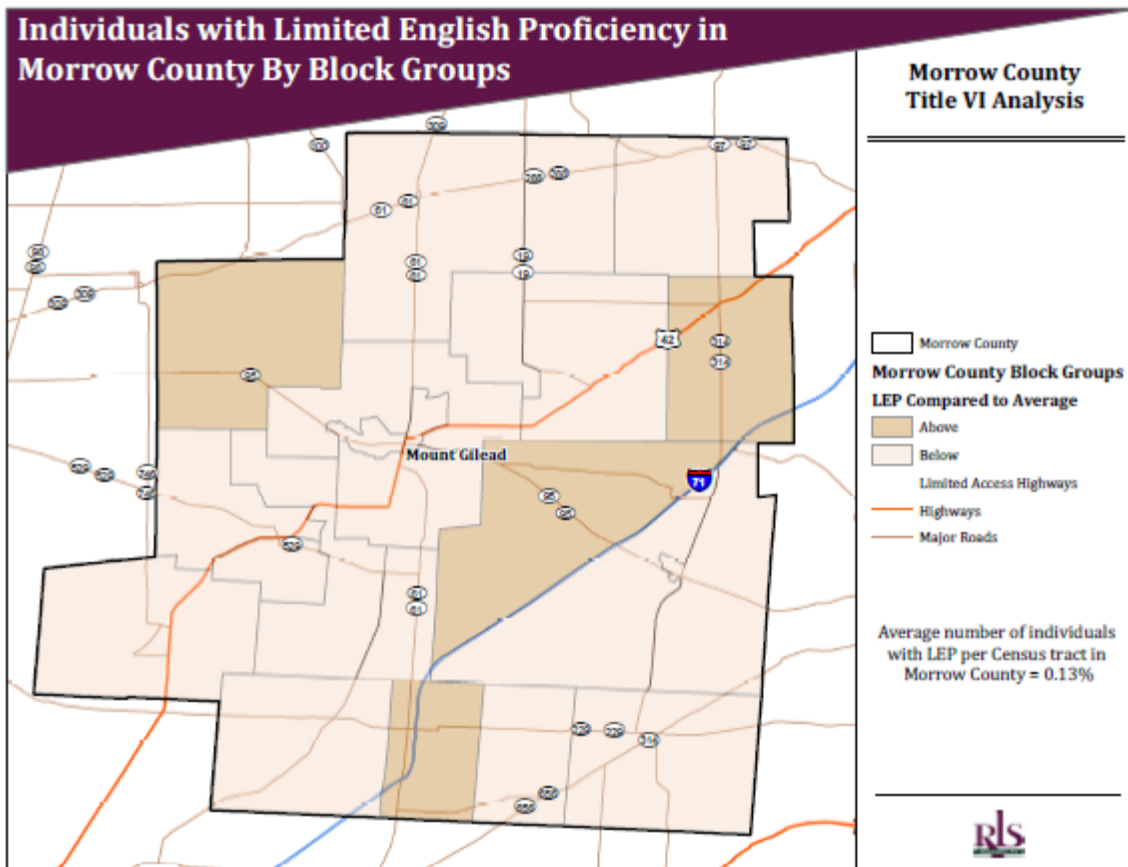
<u>Question</u>	<u>Whetstone DD</u>	<u>Morrow Co Veterans</u>	<u>Morrow Co JFS</u>
Do you encounter non-English speaking/reading people who need your services?	<b>Yes</b>	<b>No</b>	<b>Yes</b>
If so, what are the top three languages that you encounter?	<b>Russian, Non-Reading</b>	<b>N/A</b>	<b>Spanish, Russian, Somali</b>
How do you address language barriers?	<b>Interpreter &amp; Pictures</b>	<b>Have not encountered</b>	<b>Language Line for interpretation/translation</b>
Do you find language to be a barrier in preventing you from providing service?	<b>No</b>	<b>No</b>	<b>No</b>

**Consulting Directly with the LEP Population**

New plan, no data to input this current year.

**Factor 3 – The Importance of MCAT Service to People’s Lives**

Access to the services provided by MCAT are critical to the lives of many in the service area. Many depend on MCAT’s services for access to jobs and for access to essential community services like schools, shopping and medical appointments. Riders eligible for service under the American’s with Disabilities Act (ADA) require service for the same reasons. Because of the essential nature of the services and the importance of these programs in the lives of many of the region’s residents, there is a need to ensure that language is not a barrier to access.



If limited English proficiency is a barrier to using these services, then the consequences for the individual could limit their access to obtain health care, education or employment. Critical information from MCAT which can affect access includes:

- Route and schedule information
- Fare and payment information
- Information regarding making the best use of the system (How To)
- Service announcements
- Safety and security announcements
- Complaint and comment forms
- Outreach related to opportunity for public comments
- Information about demand response services under the ADA and other special programs
- What to do in an emergency (where to look for service change announcements)

**The following notice is posted on all MCAT vehicles.**

The MCAT ensures that no person shall, on the grounds of race, color, or national origin, be excluded from participating in or denied benefits of or be subjected to discrimination as it relates to the provision of public transportation services provided by the MCAT.

Any person who wants additional information on MCAT's nondiscrimination obligation or believes that he or she individually or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color, or national origin may file a complaint with the MCAT within 180 days of the date of the alleged discrimination.

To file a complaint contact MCAT at 419-864-3500, CMMMobility.org or send a letter to Sundie Brown, 619 W Marion Road, Mt Gilead, Ohio 43338.

-----

La compañía Morrow County Area Transit garantiza que ninguna persona, por motivos de raza, color u origen nacional, estén excluida de la participación o negado de los beneficios o ser sujeto de discriminación en respecto a los servicios proveidos de la Autoridad del transporte público.

Cualquier persona que cree que él o ella a título individual o como miembro de una clase específica de personas, ha sido sujeto de discriminación por motivos de raza, color, origen nacional puede presentar una queja a la compañía Merrimack Valley Regional Transit Authority dentro de los 180 días siguientes a la fecha de la supuesta discriminación.

Para presentar una queja al MVRTA, llame al **419-864-3500**, CMMMobility.org, o escribe una calta y envia a Sundie Brown, 619 W Marion Road, Mt Gilead, Ohio 43338.

**Factor 4 – Resources and Costs for LEP Outreach**

MCAT takes the commitment to improving access to its services and programs for LEP persons seriously. Any LEP language group has the right to, and shall, received competent oral interpretation of any written materials, free of cost.

**Outcomes**

**New tools and alerting riders of language assistance**

Following the “Four Factor Analysis”, MCAT concluded that, while there is currently adequate outreach and materials for the Language(s) speaking LEP population of the service area, additional services would assist other LEP populations regardless of the total population in the region. These include:



1. Adding translation services for telephone communications with customer service representatives;
2. Assigning new staff charged with improvement community engagement; and
3. Use a smart phone with translation application.

The above items are in process and will be launched on January 1, 2019.

Additional recommendations gleaned from the internal staff survey include:

1. Offering employees conversational or transit specific language training
2. Recruiting more multilingual employees.
3. A multi-language touch screen monitor where passengers can access bus route information at the terminal.
4. On-board announcements in different languages.

MCAT is considering all of these items and other methods that become available.

### **Oversight**

#### **Monitoring, Evaluating and Updating the Language Assistance Plan and Public Participation Process**

The monitoring of the Language Assistance Plan will include:

- ◆ Annual reviews of regional census data for changing patterns of LEP populations;
- ◆ Update the policy every five years;
- ◆ Ongoing collaboration with regional partners;
- ◆ Ongoing review of Google Translate requests at MCAT's website; and
- ◆ Post Event Assessments (PEA)

### **Post-Event Assessments**

Following service changes, fare increases and planning projects, **Carrie Watson, Transportation Coordinator**, assesses the effectiveness of public involvement against the goals established in this plan. This assessment will ask the questions:

- ◆ Did the public know there was an opportunity to participate?

- ◆ Was the purpose of the participation clearly articulated to the public?
- ◆ Did the public have access to appropriate resources and information to allow for meaningful participation?
- ◆ Did the decision-making process allow for consideration and incorporation of public input?
- ◆ Were there complaints about the public engagement process?
- ◆ Were the public engagement efforts cost effective?
- ◆ What additional methods could have been employed to improve the process?
- ◆ Should the Public Participation Process or Language Assistance Plan be amended?

## **Training Employees**

MCAT conducts annual and new employee training on how to use LEP translation services that are available to the public and how to inform passengers of services and documents available for LEP populations. MCAT also conducts training for office staff on how to use translation applications.

Employee awareness training for the ability to basically communicate with the LEP and low-literacy population includes a review of the telephone number available for translation services, reminders to call the dispatcher whenever there are language barriers, and how to utilize phone apps and/or online sites such as Google Translate.

## **Translation of Vital Documents**

MCAT will provide an interpreter to assist in translating many vital documents. The list of the types of documents that can be translated is provided below:

- ◆ Civil Rights Complaint Form
- ◆ ADA Eligibility
- ◆ ADA Service Overview Booklet
- ◆ Service change announcements]
- ◆ On-board notices
- ◆ Notification of free language
- ◆ Maps and schedules, rider information, ADA service information, news and event announcements
- ◆ Service Complaint Forms