

***Federal Transit Administration
Title VI Program***

Catholic Social Services of the Miami Valley

August 16, 2023

(Plan expires 3 years from date approved by the board)

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Section 1: Title VI Plan Approval & Compliance Requirements

Title VI Plan
Adopted on: August 16, 2023

Adopted by: North Counties Advisory Council

Signature(s): **Approved by virtual meeting**

Approval:

Karen Wendeln
George Atkinson
Paul Beyerle
Dianne Sielschott
Norm Schearer

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.

Catholic Social Services of the Miami Valley 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: May 5, 2022

Title VI Plan Revision Log

Date Month/day/year	Section Revised	Summary of Revisions
8/15/23	Entire Document	Creation of updated plan

Section 2: Title VI Policy Statement

Policy Statement

Catholic Social Services of the Miami Valley, 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. **Catholic Social Services of the Miami Valley** operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act.

Section 3: Notice to the Public

Title VI Notice to the Public

Catholic Social Services of the Miami Valley Notice to the Public is as follows:

Notifying the Public of Rights Under Title VI

Catholic Social Services of the Miami Valley

- The **Catholic Social Services of the Miami Valley** 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 **Catholic Social Services of the Miami Valley**.
- For more information on the **Catholic Social Services of the Miami Valley** civil rights program, the procedures to file a complaint, or to file a complaint, please contact **Title VI Coordinator at 833.289.0227** RideConnect@cssmv-sidney.org; or visit our administrative office at **100 S Main Ave Ste 101 Sidney, Ohio 45365**. For more information, visit **www.cssmv.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 833.289.0227.

Catholic Social Services of the Miami Valley Notice to the Public is posted in the public areas of the office.

1. 100 S Main Ave. Ste 101 Sidney, Ohio
2. Location
3. Location

Section 4: Title VI Complaint Procedure

Catholic Social Services of the Miami Valley Title VI Complaint Procedure is made available in the following locations:

- Agency website, if available: www.cssmv.org
 - Hard copy in the central office
 - Agency Title VI Plan
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Any individual, group of individuals or entity that believes they have been discriminated against on the basis of race, color, or national origin by **Catholic Social Services of the Miami Valley** 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 **Catholic Social Services of the Miami Valley** 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, **Catholic Social Services of the Miami Valley** 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.

Catholic Social Services of the Miami Valley has 45 days to investigate the complaint. If more information is needed to resolve the case, **Catholic Social Services of the Miami Valley** may contact the complainant requesting further information. The complainant has **15** 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 **15** business days, **Catholic Social Services of the Miami Valley** 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 **30** 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 **833.289.0227**.

Section 5: Title VI Complaint Form

Catholic Social Services of the Miami Valley Title VI Complaint Procedure is made available in the following locations:

- Agency website, if available: www.cssmv.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 833.289.0227.

Please submit this form to:

Catholic Social Services of the Miami Valley
100 S Main Ave. Suite 101 Sidney, Ohio 45365
833.289.0227
rideconnect@cssmv-sidney.org

Section 6: List of Transit Related Title VI Investigations, Complaints and Lawsuits

Catholic Social Services of the Miami Valley maintains a list or log of all Title VI investigations, complaints and lawsuits, pertaining to its transit-related activities.

Check One:

 X There have been no investigations, complaint and/or lawsuits filed against us since the last plan submission.

 There have been investigations, complaints and/or lawsuits filed against us. *See list below. Attach additional information as needed.*

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations				
1.				
2.				
Lawsuits				
1.				
2.				
Complaints				
1.				
2.				

Section 7: Public Participation Plan

Strategies and Desired Outcomes

To promote inclusive public participation, **Catholic Social Services of the Miami Valley** 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 **Catholic Social Services of the Miami Valley** 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	Catholic Social Services of the Miami Valley Staffer(s) or Department	Activity	Communication Method (Public notice, posters, social media)	Notes
5/6/2019	Michelle Caserta Bixler	Sidney Rotary	Presentation	
7/2019	Michelle Caserta Bixler	Transportation Guides	Promotional Guides for Transportation	
7/24/2019	Michelle Caserta Bixler	Sidney Kiwanis	Presentation	
2/2020	Michelle Caserta Bixler	Shelby Sidney Senior Center	Presentation	
5/4/2021	Michelle Caserta Bixler Heather Robison	GRMI Regional Council Meeting		
5/6/2021	Heather Robison	Shelby County Transit Advisory Meeting		
5/13/2021	Heather Robison	Darke County Tri-Council Meeting		
5/25/2021	Michelle Caserta Bixler Heather Robison	HSTC Council Meeting		
5/26/2021	Michelle Caserta Bixler Heather Robison	Darke County Planning Committee Meeting		
5/27/2021	Michelle Caserta Bixler Heather Robison	Shelby County Planning Committee Meeting		
8/3/2021	Michelle Caserta Bixler Heather Robison	GRMI Meeting		

8/11/2021	Heather Robison	Shelby County Community Service Council		
8/12/2021	Heather Robison	Darke County Tri Council		
8/12/2021	Heather Robison	Preble County Council on Aging		
8/18/2021	Heather Robison	Sidney Kiwanis Meeting	Presentation	
8/25/2021	Michelle Caserta Bixler Heather Robison	Darke County HSTC Meeting		
8/26/2021	Michelle Caserta Bixler Heather Robison	Shelby County HSTC Meeting		
8/30/2021	Heather Robison	Sidney Rotary Meeting	Presentation	
9/22/2021	Heather Robison	Greenville Transit Advisory Committee		
10/6/2021	Michelle Caserta Bixler Heather Robison	Shelby County Senior Center	Presentation	
10/8/2021	Heather Robison	Darke County Farmers Market	Table with Transportation Resources	
10/18/2021	Heather Robison	Wapakoneta Rotary	Presentation	
10/19/2021	Michelle Caserta Bixler Heather Robison	Darke County HSTC Meeting		
10/20/2021	Heather Robison	Darke County Ministerial Assoc Meeting		
10/20/2021	Michelle Caserta Bixler Heather Robison	Shelby County HSTC Meeting		
11/11/2021	Heather Robison	Darke County Tri-Council Meeting		
11/17/2021	Heather Robison	Hope4Good Meeting – Champaign County		
12/7/2021	Heather Robison	Darke County Rotary Meeting	Presentation	
12/16/2021	Heather Robison	Champaign County Stepping Up Meeting	Presentation	
1/19/2022	Heather Robison	Hope4Good Meeting – Champaign County	Presentation	
1/26/2022	Michelle Caserta Bixler Heather Robison	Urbana Lion's Club	Presentation	
1/27/2022	Heather Robison	COLCAS Logan County	Presentation	
2/9/2022	Heather Robison	Shelby County Community Service Council		
2/14/2022	Heather Robison	Urbana Rotary Presentation	Presentation	
2/16/2022	Heather Robison	Hope4Good meeting		
3/22/2022	Michelle Caserta Bixler Heather Robison	Darke County HSTC Meeting		
3/23/2022	Michelle Caserta Bixler Heather Robison	Shelby County HSTC Meeting		

3/23/2022	Heather Robison	Greenville Transit TAC Meeting		
5/12/2022	Heather Robison	Darke County Tri Council Meeting		
5/17/2022	Michelle Caserta Bixler Heather Robison	Darke County HSTC Meeting		
5/18/2022	Michelle Caserta Bixler Heather Robison	Shelby County HSTC Meeting		
5/25/2022	Michelle Caserta Bixler Heather Robison	Catholic Social Services Provider Fair	Table with Transportation Resources	
5/26/2022	Heather Robison	FACTS Transportation Meeting	Presentation	
6/7/2022	Heather Robison	ALS Resource Panel	Presentation	
6/8/2022	Heather Robison	Shelby County Community Service Meeting		
6/22/2022	Michelle Caserta Bixler Heather Robison	Montgomery County Board of DD Meeting	Presentation	
6/30/2022	Heather Robison	Mercer County Area on Aging Provider Fair	Table with Transportation Resources	
7/26/2022	Heather Robison	Shelby County Fair – Senior Day	Table with Transportation Resources	
8/11/2022	Heather Robison	Tri Council Meeting Darke County		
8/11/2022	Heather Robison	Public Employees Retirement Meeting		
8/5/2022 8/12/2022	Michelle Caserta Bixler Heather Robison	Champaign County Fair	Table with Transportation Resources	
8/15/2022	Michelle Caserta Bixler Heather Robison	Darke County HSTC Meeting		
8/19/2022- 8/27/2022	Michelle Caserta Bixler Heather Robison	Darke County Fair	Table with Transportation Resources	
8/24/2022	Heather Robison	Hope4Good Meeting		
9/6/2022	Michelle Caserta Bixler Heather Robison	GRMI/HSTC Meeting		
10/2022		Reach Magazine	RideConnect Program Information	
11/2022		Spectrum News	RideConnect Promotion	
11/2/2022	Michelle Caserta Bixler Heather Robison	Union County MOVES Coalition		
11/30/2022	Heather Robison	Darke County TAC Meeting		

Section 8: Language Assistance Plan

Plan Components

As a recipient of federal US DOT funding, **Catholic Social Services of the Miami Valley** 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.

Catholic Social Services of the Miami Valley 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, **Catholic Social Services of the Miami Valley** 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, **Catholic Social Services of the Miami Valley** 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 **Catholic Social Services of the Miami Valley** 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 43,406 residents aged 5 years and over in **Auglaize County’s** service area, 184 residents describe themselves as speaking English less than “very well”. People of Spanish descent are the primary LEP persons likely to utilize Catholic Social Services of the Miami Valley’s services. For Catholic Social Services of the Miami Valley’s service area, the latest U.S. Census Bureau data shows that among the area’s population 0.42% speak English “less than very well.” **For these groups** who speak English “less than very well”, 28.8% speak Spanish.

Auglaize County – Languages Spoke at Home

	Total Number	Percent of Population	Total Population of County – 5 Year and Over
Speak Language other than English	886	2.04%	43,406
Total - Speak English Less than Very Well	184	0.42%	43,406
Spanish – Speaks English Less than Very Well	120	0.28%	43,406
Other Indo-European Languages – Speak English Less than Very Well	39	0.09%	43,406
Asian and Pacific Island Languages – Speak English less than Very Well	25	0.06%	43,406
Other Languages – Speak English Less Than Very Well	0	0.00%	43,406

Of the 36,629 residents aged 5 years and over in **Champaign County’s** service area, 162 residents describe themselves as speaking English less than “very well”. People of Hispanic descent are the primary LEP persons likely to utilize Catholic Social Services of the Miami Valley’s services. For Catholic Social Services of the Miami Valley’s service area, the latest U.S. Census Bureau data shows that among the area’s population 0.44% speak English “*less than very well.*” **For these groups** who speak English “less than very well”, 54.7% speak Asian and Pacific Island Languages.

Champaign County – Languages Spoke at Home

	Total Number	Percent of Population	Total Population of County – 5 Year and Over
Speak Language other than English	418	1.14%	36,629
Total - Speak English Less than Very Well	162	0.44%	36,629
Spanish – Speaks English Less than Very Well	91	0.25%	36,629
Other Indo-European Languages – Speak English Less than Very Well	24	0.07%	36,629
Asian and Pacific Island Languages – Speak English less than Very Well	47	0.13%	36,629
Other Languages – Speak English Less Than Very Well	0	0.00%	36,629

Of the 128,073 residents aged 5 years and over in **Clark County’s** service area, 1,694 residents describe themselves as speaking English less than “very well”. People of Hispanic descent are the primary LEP persons likely to utilize Catholic Social Services of Miami Valley’s services. For Catholic Social Services of Miami Valley’s service area, the latest U.S. Census Bureau data shows that among the area’s population 1.32% speak English “*less than very well.*” **For these groups** who speak English “less than very well”, 66.5% speak Asian and Pacific Island Languages.

Clark County – Languages Spoke at Home

	Total Number	Percent of Population	Total Population of County – 5 Year and Over
Speak Language other than English	4,108	3.21%	128,073
Total - Speak English Less than Very Well	1,694	1.32%	128,073
Spanish – Speaks English Less than Very Well	1,081	0.84%	128,073

Other Indo-European Languages – Speak English Less than Very Well	346	0.27%	128,073
Asian and Pacific Island Languages – Speak English less than Very Well	244	0.19%	128,073
Other Languages – Speak English Less Than Very Well	23	0.02%	128,073

Of the 48,731 residents ages 5 years and over in **Darke County’s** service area, 163 residents describe themselves as speaking English less than “very well”. People of Other Indo-European descent are the primary LEP persons likely to utilize Catholic Social Services of Miami Valley’s services. For Catholic Social Services of Miami Valley’s service area, the latest U.S. Census Bureau data shows that among the area’s population 0.33% speak English “*less than very well.*” **For these groups** who speak English “less than very well”, 96.4% speak Other Languages.

Darke County – Languages Spoke at Home

	Total Number	Percent of Population	Total Population of County – 5 Year and Over
Speak Language other than English	736	1.51%	48,731
Total - Speak English Less than Very Well	163	0.33%	48,731
Spanish – Speaks English Less than Very Well	31	0.06%	48,731
Other Indo-European Languages – Speak English Less than Very Well	45	0.09%	48,731
Asian and Pacific Island Languages – Speak English less than Very Well	33	0.07%	48,731
Other Languages – Speak English Less Than Very Well	54	0.11%	48,731

Of the 159,986 residents aged 5 years and over in **Greene County’s** service area, 1,990 residents describe themselves as speaking English less than “very well”. People of Other-Indo European descent are the primary LEP persons likely to utilize Catholic Social Services of Miami Valley’s services. For Catholic Social Services of Miami Valley’s service area, the latest U.S. Census Bureau data shows that among the area’s population 4.53% speak English “*less than very well.*” **For these groups** who speak English “less than very well”, 33.3% speak Asian and Pacific Island Languages.

Greene County – Languages Spoke at Home

	Total Number	Percent of Population	Total Population of County – 5 Year and Over
Speak Language other than English	9,658	6.04%	159,986
Total - Speak English Less than Very Well	7,250	4.53%	159,986
Spanish – Speaks English Less than Very Well	1,990	1.24%	159,986
Other Indo-European Languages – Speak English Less than Very Well	3,144	1.97%	159,986
Asian and Pacific Island Languages – Speak English less than Very Well	1,588	0.99%	159,986
Other Languages – Speak English Less Than Very Well	528	0.33%	159,986

Of the 43,295 residents aged 5 years and over in **Logan County’s** service area, 425 residents describe themselves as speaking English less than “very well”. People of Asian and Pacific Island descent are the primary LEP persons likely to utilize Catholic Social Services of the Miami Valley’s services. For Catholic Social Services of the Miami Valley’s service area, the latest U.S. Census Bureau data shows that among the area’s population 0.98% speak English “less than very well.” **For these groups** who speak English “less than very well”, 60.4% speak Asian and Pacific Island Languages.

Logan County – Languages Spoke at Home

	Total Number	Percent of Population	Total Population of County – 5 Year and Over
Speak Language other than English	1,185	2.74%	43,295
Total - Speak English Less than Very Well	425	0.98%	43,295
Spanish – Speaks English Less than Very Well	133	0.31%	43,295
Other Indo-European Languages – Speak English Less than Very Well	48	0.11%	43,295
Asian and Pacific Island Languages – Speak English less than Very Well	244	0.56%	43,295
Other Languages – Speak English Less Than Very Well	0	0.00%	43,295

Of the 39,054 residents aged 5 years and over in **Mercer County’s** service area, 39,054 residents describe themselves as speaking English less than “very well”. People of Asian and Pacific Island descent are the primary LEP persons likely to utilize Catholic Social Services of Miami Valley’s services. For Catholic Social Services of Miami Valley’s service area, the latest U.S. Census Bureau data shows that among the area’s

population 0.69% speak English “less than very well.” **For these groups** who speak English “less than very well”, 45.7% speak Spanish.

Mercer County – Languages Spoke at Home

	Total Number	Percent of Population	Total Population of County – 5 Year and Over
Speak Language other than English	808	2.07%	39,054
Total - Speak English Less than Very Well	268	0.69%	39,054
Spanish – Speaks English Less than Very Well	111	0.28%	39,054
Other Indo-European Languages – Speak English Less than Very Well	2	0.01%	39,054
Asian and Pacific Island Languages – Speak English less than Very Well	147	0.38%	39,054
Other Languages – Speak English Less Than Very Well	8	0.02%	39,054

Of the 101,622 residents aged 5 years and over in **Miami County’s** service area, 1,308 residents describe themselves as speaking English less than “very well”. People of Asian and Pacific Island descent are the primary LEP persons likely to utilize Catholic Social Services of Miami Valley’s services. For Catholic Social Services of Miami Valley’s service area, the latest U.S. Census Bureau data shows that among the area’s population 1.29% speak English “less than very well.” **For these groups** who speak English “less than very well”, 49.8% speak Asian and Pacific Island Languages.

Miami County – Languages Spoke at Home

	Total Number	Percent of Population	Total Population of County – 5 Year and Over
Speak Language other than English	3,999	3.94%	101,622
Total - Speak English Less than Very Well	1,308	1.29%	101,622
Spanish – Speaks English Less than Very Well	124	0.12%	101,622
Other Indo-European Languages – Speak English Less than Very Well	339	0.33%	101,622
Asian and Pacific Island Languages – Speak English less than Very Well	737	0.73%	101,622
Other Languages – Speak English Less Than Very Well	108	0.11%	101,622

Of the 504,126 residents in **Montgomery County’s** service area, 11,684 residents describe themselves as speaking English less than “very well”. People of Hispanic] descent are the primary LEP persons likely to utilize Catholic Social Services of Miami Valley’s services. For Catholic Social Services of Miami Valley’s service area, the latest U.S. Census Bureau data shows that among the area’s population 2.32% speak English “less than very well.” **For these groups** who speak English “less than very well”, 41.8% speak Asian and Pacific Island Languages.

Montgomery County – Languages Spoke at Home

	Total Number	Percent of Population	Total Population of County – 5 Year and Over
Speak Language other than English	35,780	7.10%	504,126
Total - Speak English Less than Very Well	11,684	2.32%	504,126
Spanish – Speaks English Less than Very Well	3,807	0.76%	504,126
Other Indo-European Languages – Speak English Less than Very Well	3,096	0.61%	504,126
Asian and Pacific Island Languages – Speak English less than Very Well	3,772	0.75%	504,126
Other Languages – Speak English Less Than Very Well	1,009	0.20%	504,126

Of the 39,879 residents aged in **Preble County** service area, 135 residents describe themselves as speaking English less than “very well”. People of Other Indo-European] descent are the primary LEP persons likely to utilize Catholic Social Services of Miami Valley’s services. For Catholic Social Services of Miami Valley’s service area, the latest U.S. Census Bureau data shows that among the area’s population 0.35% speak English “less than very well.” **For these groups** who speak English “less than very well”, 63.2% speak Other Languages.

Preble County – Languages Spoke at Home

	Total Number	Percent of Population	Total Population of County – 5 Year and Over
Speak Language other than English	706	1.82%	38,879
Total - Speak English Less than Very Well	135	0.35%	38,879
Spanish – Speaks English Less than Very Well	41	0.11%	38,879
Other Indo-European Languages – Speak English Less than Very Well	53	0.14%	38,879
Asian and Pacific Island Languages – Speak English less than Very Well	29	0.07%	38,879

Other Languages – Speak English Less Than Very Well	12	0.03%	38,879
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Of the 45,197 residents aged 5 years and over in **Shelby County’s** service area, 501 residents describe themselves as speaking English less than “very well”. People of Hispanic descent are the primary LEP persons likely to utilize Catholic Social Services of Miami County’s services. For Catholic Social Services of Miami Valley’s service area, the latest U.S. Census Bureau data shows that among the area’s population 1.11% speak English “*less than very well.*” **For these groups** who speak English “less than very well”, 90.8% speak Asian and Pacific Island Languages.

Shelby County – Languages Spoke at Home

	Total Number	Percent of Population	Total Population of County – 5 Year and Over
Speak Language other than English	922	2.04%	45,197
Total - Speak English Less than Very Well	501	1.11%	45,197
Spanish – Speaks English Less than Very Well	195	0.43%	45,197
Other Indo-European Languages – Speak English Less than Very Well	62	0.14%	45,197
Asian and Pacific Island Languages – Speak English less than Very Well	187	0.41%	45,197
Other Languages – Speak English Less Than Very Well	57	0.13%	45,197

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

Catholic Social Services of the Miami Valley assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. Catholic Social Services of the Miami Valley provides approximately 935 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.

1

All of **Catholic Social Services of the Miami Valley** programs are important; however, those related to safety, public transit, nondiscrimination, and public involvement are among the most important. **Catholic Social Services of the Miami Valley** 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, **Catholic Social Services of the Miami Valley** will strive to provide alternative but meaningfully accessibility. Moreover, **Catholic Social Services of the Miami Valley** continually evaluates its programs, services, and activities to ensure that persons who may be LEP are always provided with meaningful access.

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

Catholic Social Services of the Miami Valley makes every effort to make its programs, services, and activities, accessible to LEP individuals. **Catholic Social Services of the Miami Valley** 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

Catholic Social Services of the Miami Valley has identified, developed, and uses the following:

- a) **Catholic Social Services of the Miami Valley** has staff who are available to assist with its LEP responsibilities.
- b) 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 **Catholic Social Services of the Miami Valley** language assistance measures, **Catholic Social Services of the Miami Valley** provides the following:

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

Item # 4 – Description of how the Language Assistance Plan is Monitored and Updated

Catholic Social Services of the Miami Valley 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 **Catholic Social Services of the Miami Valley** 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 **Catholic Social Services of the Miami Valley** financial resources are sufficient to fund language assistance resources needed.
- Determine whether **Catholic Social Services of the Miami Valley** has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning **Catholic Social Services of the Miami Valley** 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 **Catholic Social Services of the Miami Valley** staff:

- Information on the **Catholic Social Services of the Miami Valley** Title VI Procedures and LEP responsibilities.
- Description of language assistance services offered to the public.
- 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

Catholic Social Services of the Miami Valley 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 **Catholic Social Services of the Miami Valley** to obtain translators. The agency will also utilize web-based translator programs if available.

If you need help with English, please call 833.289.0227.

“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 vaø oâ naøÿ 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
	आप हिंदी बोलते हैं तो इस बक्से को चिह्नित 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.

Minority Representation Table

Catholic Social Services of Miami Valley does not currently have any transit-related, non-elected planning board, advisory councils or committees, or similar committees, the membership of which is selected by the recipient.'

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

Body	Caucasian	Hispanic	African American	Asian American	Native American	Two or More Races
N/A						
N/A						

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 Catholic Social Services of the Miami Valley will make every effort to encourage minority participation on the boards.

Section 10: Providing Assistance to and Monitoring Subrecipients

1. Does agency provide funding to subrecipients?

No, the agency does not have subrecipients.

Yes. If yes, list the subrecipient names: (list other agency names here)

Insert Agency Name monitors subrecipients using the following process:

1. Insert Agency Name uses the following process for ensuring all subrecipients are complying with the general reporting requirements of FTA Circular 4702.1B: (document the process here)
2. Insert Agency Name collects Title VI programs from the subrecipients listed above and reviews programs for compliance by (list the process here)

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, the agency has not built a facility.

- Yes, the agency has built a facility and completed a Title VI equity analysis to compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site. (Include at the end of the Title VI plan a copy of the Title VI equity analysis.)

Section 12: Fixed Route Transit Providers Service Standards and Policies

FTA Circular 4702.1B, Chapter III, Paragraph 10: All fixed route transit providers shall set service standards and policies for each specific fixed route mode of service they provide.

Catholic Social Services of the Miami Valley:

- is a fixed route transit provider

- is **not** a fixed route transit provider