

Community Action Transit System

A Division of the Community Action Committee of Pike County

Transit Title VI Program Requirements for ODOT Transit Sub-recipients

September 2017



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Pike Title VI Notice to the Public

Posted at the following locations:

- Community Action Committee of Pike County Main Agency
- Community Action Transit Facility
- Agency Website: www.catsservices.org
- All Transit Vehicles

Notifying the Public of Rights Under Title VI

Community Action Committee of Pike County

- The Community Action Committee of Pike County 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 Community Action Committee of Pike County.
- For more information on the Community Action of Pike County's civil rights program, and the procedures to file a complaint, contact 866-820-1185, (TTY 740-289-2608); email CErvin@pikecac.org; or visit our administrative office at 941 Market Street, Piketon, Ohio 45661. For more information, visit www.pikecac.org/CATS.
- For transportation-related Title VI matters, a complainant may file a complaint directly with the Ohio Department of Transportation by filing a complaint with the Office of Equal Opportunity, Attention: Title VI Coordinator, 1980 West Broad St., Columbus, OH 43223.
- For transportation-related Title VI matters, a complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.
- If information is needed in another language, contact 866-820-1185.

**36COMMUNITY ACTION COMMITTEE OF PIKE COUNTY
POLICY MANUAL**

941 Market St., Box 799, Piketon, OH 45661

SUBJECT: ADA AND TITLE VI COMPLAINT PROCEDURE FOR TRANSIT	SECTION: 05.10.00.01 PAGE: 1 of 4
EFFECTIVE DATE: June 27, 2016	SUPERCEDES: 05.10.00.01
ISSUE DATE: June 27, 2016	PAGE NUMBER(S): 1 of 2
APPROVED BY: Executive Director	SECTION NUMBER: 05.10.00.01
APPROVAL DATE: June 27, 2016	EFFECTIVE: September 22, 2015

DIRECTIVE:

To implement a procedure for Americans with Disabilities (ADA) and Title VI Complaints for users of the Transit System.

PROCEDURE:

Any person who believes she or he has been discriminated against because they have a disability or on the basis of race, color, or national origin by the Community Action Transit System (hereinafter referred to as "the System") may file an ADA or Title VI complaint by completing and submitting the System's ADA/Title VI Complaint Form. The Transit Program Director shall serve as the ADA/Title VI Coordinator and shall notify the System's Ohio Department of Transportation (ODOT) Rep immediately upon receipt of an ADA or Title VI Complaint.

Immediately upon receipt of an ADA complaint, the ADA Coordinator will work with the Complainant and the System to resolve the issue at the local level. The ADA Coordinator will communicate the response and the reason for the response to the Complainant in writing, maintaining documentation of the correspondence in System files.

When a Title VI 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 in our office.

The System has 30 days to investigate a Title VI 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 ADA/Title VI Coordinator/Investigator reviews a Title VI 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. 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.

In order to comply with the reporting requirement of 49 CFR Section 21.9(b), FTA requires all recipients to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin; active investigations conducted by the entities other than FTA; lawsuits; and complaints naming the recipient. This list shall include the date that investigation, lawsuit, or complaint was filed, a summary of the allegation(s); the status of the investigation, lawsuit or complaint; and actions taken by the recipient in response, or final findings related to, the investigation, lawsuit or complaint. This list shall be included in the Title VI Program submitted to FTA every three years.

RESPONSIBILITIES:

The Transit Program Director is responsible for implementing the above procedure.

The Community Action Transit System is committed to providing you with safe and reliable transportation services and we want your feedback. Please use this form for suggestions, compliments, and complaints. You may also call us at (740) 835-8474, visit our transit facility at 508 Howard Street, Waverly, Ohio, or contact us by email at Drenner@pikecac.org or by U.S. postal mail to Diane Renner, Transit Program Director, Community Action Transit System, 508 Howard Street, Waverly, Ohio 45690. Please make sure to provide us with your contact information in order to receive a response.

Section I: Type of Comment (choose 1)					
Compliment ____	Suggestion ____	Complaint ____	Other ____	ADA related? Y/N	
Section II: Contact Information					
Name:					
Address:					
Telephone (Home):					
Electronic Mail Address:					
Accessible Format		Large Print		Audio Tape	TDD/Relay
Requirements?		TDD		Other	
Section III: Comment Details					
Date of Incident: _____			Time of Incident: _____		
Name of Employee or Others Involved: _____					
Vehicle #/Route Name:					
Location of Incident:					
Mobility Aid used (if any):					
Description of Incident (use back of form for additional space):					
Section IV: Follow UP					
May we contact you if we need more information:		Yes		No	
What is the best way to reach you? (choose one):		Phone	Email	Mail	
If phone call is preferred what is the best time of day to reach you: _____					
Telephone Number:					

Please submit this form in person, by e-mail or by US Postal service to:

Diane Renner, ADA Coordinator
Community Action Transit System
508 Howard Street
Waverly, Ohio 45690
Drenner@pikecac.org

TITLE VI COMPLAINT FORM

Section I:			
Name: _____			
Address: _____			
Telephone (Home): _____			
Electronic Mail Address: _____			
Accessible Format Requirements?	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 permission of aggrieved third party	Yes	No	
Section III:			
I believe the discrimination I experienced was based (check all the apply): () Race () Color () 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 the agency? Yes _____ No _____			
Section V			
Have you file 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: _____			
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

Please submit this form in person at the address below or mail this form to:
Community Action Committee of Pike County
941 Market Street
Piketon, Ohio 45661

Pike List of Transit-related Title VI Investigations, Complaints, and Lawsuits

Period: January 1, 2012 – August 31, 2017

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

Pike 2017 Public Participation Plan

The Community Action Transit System is a demand-responsive, door to door public transportation system operating in Pike County, Ohio with out of county service available on a limited basis based on a regular schedule. Passengers are required to schedule rides at least twenty four hours in advance of when service is needed. Service is financed, in part, through donations and funding provided by the Community Action Committee of Pike County, Community Service Block Grant dollars as well as from state and federal funds provided through the Ohio Department of Transportation and the Federal Transit Administration (FTA). Transit fare and contract revenues also serve to sustain system operations.

This Plan sets forth various ways in which the public can inclusively participate in planning, provide feedback/commentary and how the Community Action Transit System will undertake outreach methods to engage persons from diverse backgrounds, those with low-moderate incomes and populations with limited English proficiency (LEP) skills.

PURPOSE

Pursuant to the revised Title VI, 4702.1B Circular, this Citizen Participation Plan is hereby adopted to ensure that the citizens of Pike County, Ohio, including persons from diverse racial backgrounds, those with disabilities, limited English proficiency skills and persons with low and moderate income levels, are included in active public participation opportunities related to the planning and implementation of Community Action Transit System (CATS) activities.

ENCOURAGEMENT OF CITIZEN PARTICIPATION

Citizens are encouraged to participate in all aspects related to the planning and implementation of the CATS; including the development of grant applications, procedures, policies, strategic planning, public hearings, public meetings, and operational assessment processes.

CATS especially encourages participation from County residents with low- and moderate-incomes, minority, non- and limited-English proficient speaking residents as well as persons with disabilities residing in Pike County.

CATS also encourages local government, social service and community agencies, who often serve a myriad of populations, to participate in planning and implementation activities as well. In order to achieve this objective, CATS has engaged representation from various agencies serving populations that are often of low-moderate income levels, serve a diverse base of clientele or have special needs on the Pike County Transportation Advisory Council.

CITIZEN COMMENTARY

CATS will provide citizens with a reasonable opportunity (generally, at least 30 days) to publicly review and comment on transportation documents or plans requiring specified public review and comment periods. CATS will give full consideration and response to citizens' concerns, comments, and recommendations. Where applicable, review will be advertised in the local newspaper, the *News Watchman*, in accordance with ODOT mandates, prior to the first day of the review and comment

period. All affected documents will also be made available in electronic (and other) formats to persons with disabilities, upon request. All documents will be considered public and available for citizen review, upon request, at the Transit Facility, located at 508 Howard Street, Waverly, Ohio during normal CATS business hours.

PUBLIC HEARINGS

Public hearings will be held to obtain citizens' views and to respond to proposals and questions. Annually, at least one public hearing is held prior to the grant application being submitted to ODOT.

All public hearings will be held in an accessible location (generally the Transit Facility). All public hearings will be advertised in the local newspaper of circulation (*The News Watchman*) not less than 30 calendar days before the scheduled public hearing. All advertisements published will be placed in easily readable type in the non-legal section of the newspaper. Each advertisement will state the date, time and place of the public hearing. All public hearings will be held in locations providing complete handicap accessibility and in locations centrally located in the community to provide easy access to all residents. All public hearings will begin and be completed within timeframes when the local public transportation system (CATS) is in operation, making the hearing more accessible to persons who might be potential or actual beneficiaries.

Pike County, Ohio currently does not have high concentrations of non-English speaking persons. CATS will, however, make every effort to encourage participation at all public hearings by non-English speaking persons by providing interpretation and translation if requested in advance (as noted within the newspaper advertisement announcing that specific meeting). The cost of such services will be paid for by CATS using ODOT funds and will not be passed along to those persons being assisted.

MEETINGS

Citizens are encouraged to attend any scheduled meetings (including Transit Advisory Council meetings). Electronic notices will be sent to committee members at least 7 calendar days in advance of said meetings. Beginning in 2016, a public service announcement will also be published on the Community Action Committee of Pike County website and the Transit and Mobility Management Facebook pages at least 7 calendar days prior to the meeting to inform passengers and other interested parties who may wish to attend the meeting. Both the notices and public service announcement will state the date, time and place of the meeting.

Public hearings will be held in an accessible location (generally the Transit Facility). Public hearings will also be held during those times when the CATS is in operation, which provides a greater likelihood that participation is all inclusive.

AVAILABILITY TO THE PUBLIC

All public documents related to the CATS will be available to the public upon request. This includes the availability of materials in a format accessible to persons with disabilities upon request. Requests must be made to CATS, located at 508 Howard Street, Waverly, Ohio during normal CATS business hours on Monday through Friday from 8:00 a.m. until 4:30 p.m. (except during agency holidays). Hard copies will be available for purchase at the current per-page rate as established by the CAC Fiscal Department.

ACCESS TO RECORDS

All public records, documents and reports pertaining to the CATS are kept in the front office of the Community Action Committee of Pike County, 941 N. Market St., Piketon, Ohio 45661 (Phone: (740)289-2371; Fax: (740) 289-4291). Documents will be made available to the public upon request during regular business hours as stated above. Records will be retained in accordance with applicable Public Record Retention laws, but in no case for a period less than three years. Hard copies will be available for purchase at the current per-page rate as established by the CAC Fiscal Department.

TECHNICAL ASSISTANCE IN MAKING COMMENTS/COMPLAINTS

Technical assistance will be provided to any persons requesting such assistance in developing complaints or comments as an accommodation. For example, CATS personnel can record audio versions of said comments or complaints or transcribe them with final review/approval of the person making the comment and/or complaint.

CITIZEN COMPLAINTS

CATS has included in its CAC Policies and Procedures manual a policy outlining the methods for members of the public to make complaints/comments, including those related to Title VI matters.

CATS will provide a timely and substantial written response to any complaints received regarding the operation or implementation of the CATS or any aspect related to it. Said policy contains provisions which allow for second review of the matter as well as an appeals process.

PERSONS WITH DISABILITIES

Public hearings and community meetings will be held in locations accessible to persons with restricted mobility. All public hearings will be held at times when CATS is in operation. CATS is the local public transit system. Its vehicles are accessible to persons with disabilities. Upon request, copies of all written materials are available in alternative formats.

PERSONS WITH LIMITED-ENGLISH PROFICIENCY

Based on figures from the 2010 Census, Pike County does not have high concentrations of non-English speaking persons. According to the 2014 Census update, only 2.8% of Pike County residents speak a language other than English in their homes. Pike County CATS will, however, make every effort to provide interpretation and translation if provided at least 72 hours advance notice. The cost of such services will be paid for by CATS using ODOT grant funds and will not be passed along to those persons being assisted.

Annually, CATS conducts a Limited English Proficiency Four-Factor Analysis. Utilizing the results of said Analysis, the CATS Program Director will draft a CATS Limited English Proficiency Plan which will be presented to the members of the Transportation Advisory Council (TAC) for review and approval. As noted in a prior section, notice of all TAC meetings is published in an effort to encourage public participation.

ACCESS TO INFORMATION

Various policies and procedures promoting greater citizen access to information have been adopted by the Community Action Committee of Pike County and are included in the CAC Transit Policies & Procedures Manual. Included among said policies and procedures are those related to Americans with Disabilities Act compliance, communication of changes, access to information, and a procedure for implementing service changes.

Citizens are encouraged to participate in the process of making service changes. CATS encourages participation from all residents including those with low- and moderate-level incomes, minorities, non-English speaking persons as well as persons with disabilities residing in Pike County. CATS also encourages local government, social service, business and community service agencies to participate in the process of making service changes.

The Pike County Transportation Advisory Council generally meets on a quarterly basis at 1:00 pm at the Transit Facility, 508 Howard Street, a fully-accessible location. The Council Schedule is published and available online (www.catsservice.org).

2015, 2016, 2017 OUTREACH EFFORTS

- Use of Social Media
- Use of Agency Website
- Passenger Survey
- Presence at the following partner/community meetings:
 - Pike County Continuum of Care
 - Pike County Community Fund Meetings
 - Pike County Senior Advisory Meetings
 - Pike County Human Service Council Meetings
 - Pike County Job and Family Service Planning Meetings

Community Action Transit System - CATS

LIMITED ENGLISH PROFICIENCY PLAN

Approved 2015

SUBJECT:

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

PURPOSE:

To provide guidance regarding the obligation to provide language assistance to persons with LEP

AUTHORITY:

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

SCOPE:

The Community Action Transit System (CATS) Transportation Advisory Committee has adopted this plan to provide meaningful access to the Anywhere Transit by persons with LEP.

MEANINGFUL ACCESS—THE FOUR-FACTOR ANALYSIS:

CATS Transportation Advisory Committee will annually assess and update the LEP Four-Factor Analysis for the CATS. At a minimum, the analysis will include the following four components:

- The number or proportion of persons with LEP eligible to be served or likely to be encountered by the CATS.
- The frequency with which persons with LEP come into contact with the CATS.
- The nature and importance of the CATS to persons with LEP.
- The CATS' Resources and Anticipated Costs for providing meaningful access to persons with LEP.

Prior to the development of the CATS LEP Plan in 2013, a Four-Factor Analysis was conducted by the Program Director. Various forms of federal, state and local LEP-related data were analyzed. The Analysis provided the CATS with a more comprehensive understanding of how many people with LEP are likely to be encountered by the CATS and how often those persons have accessed the CATS in the past year. The Analysis served as the basis for the CATS' LEP Plan.

THE IDENTIFICATION OF LEP INDIVIDUALS WHO NEED LANGUAGE ASSISTANCE – 2015 UPDATE:

1. Census, state and local demographic data: According to data from the 2010 U.S. Census Bureau (updated for 2014), 2.8% of the local population, aged five years, or older, speak a language other than English. That is approximately 791 individuals. In reviewing the available federal data, no discernable concentrations of persons with limited English proficiency were noted in Pike County, Ohio.

2. Information gathered from staff who have or might come into contact with persons with LEP: The Transit Operations Specialist and Drivers for the CATS reported that staff contact with a person with LEP is a rare, very infrequent occurrence. Such contact has not been reported at all in the past several years.
3. Process to determine frequency in which future LEP encounters occur: A process for determining the frequency with which persons with LEP come into contact with the Community Action Transit System (CATS) has been developed. Implementation of this process will ensure that annual assessment of the current LEP Plan is reflective of the community's most-current needs. CATS staff will verbally communicate any LEP encounters they might have with the Transit Operations Specialist or the Transit Operations Supervisor, as they occur. "LEP encounter reports should include the date of the encounter, the number of persons with LEP encountered, the languages spoken by the person(s), the types of assistance sought and the point of contact (e.g. This encounter occurred when the patron scheduled a trip). During 2014, the Transit Operations Specialist added a column to the monthly report to track any LEP encounters that may occur. In addition, the LEP Plan is shared at annual driver training so that drivers know they need to report any encounters they may have.
4. Synopsis of How Many Persons Need Language Assistance: As noted above, CATS LEP encounters have been non-existent to date. Federal, state and local data indicate that the actual number of persons with LEP who live in Pike County, Ohio is quite limited—substantiating that the number of persons actually served is in alignment with the number within the community. The analysis of data also suggests that, even though LEP encounters are anticipated to be rare in the future,

LANGUAGE ASSISTANCE MEASURES:

The Community Action Committee of Pike County currently has staff that can provide free interpretation or translation of printed materials for persons who speak Spanish and need language assistance. Although actual delivery is not guaranteed for languages other than Spanish, the Community Action Transit System will make reasonable efforts to arrange for free language assistance for any consumer—regardless of the language spoken.

1. Language assistance measures already implemented by CATS: To date, CATS has never officially received a request for assistance with oral or written language interpretation/translation.
2. Procedures for obtaining oral/written language interpretation: The Community Action Committee of Pike County currently has staff with a functioning degree of Spanish language proficiency. As a result, bilingual staff members will first attempt to assist Spanish speaking persons requesting or needing assistance.
3. Instructions for staff on how to respond to callers with LEP: CATS Staff will follow the Community Action Committee of Pike County Policy #03-04.26.00, Communications with Limited English Proficient Persons. This policy is updated on an as needed basis to include new contact persons for LEP persons.

4. In the event a **language other than Spanish** is encountered, the Program Director must be notified so that a volunteer interpreter can be sought. The CATS Transit Supervisor (or designee) will report all encounters immediately, along with:

- The language encountered; and
- The type of language assistance requested (e.g. written translation of documents).

Thereafter, the Program Director will make every reasonable effort to secure a volunteer interpreter working through Ohio State University Linguistics Department, Language Line Services at 888-808-9008. The Community Action Committee of Pike County, however, will make every reasonable attempt to secure volunteer language assistance. If a volunteer interpreter is located, language assistance will be provided to the individual free of cost.

3. Instructions for staff on how to respond to written communication from a person with LEP:

When communications written in **Spanish** are received, the Program Director must be notified as soon as possible. Thereafter, the Program Director will utilize one of the bilingual staff persons to provide translation as well as the assistance necessary to respond to the patron in writing. It will be the Program Director's responsibility to record these encounters at the time they occur for inclusion in the coming years' Four-Factor Analysis.

In the event that correspondence is received in a **language other than Spanish**, the Program Director must be notified as soon as possible. Thereafter, the Program Director will attempt to locate a volunteer through Ohio State University Linguistics Department Language Line Services (LLS) at 888-808-9008 who can translate the correspondence and assist in providing a written response. It will be the Program Director's responsibility to record these encounters at the time they occur for inclusion in the coming years' Four-Factor Analysis.

4. Instructions for drivers on how to respond to persons with LEP: The call takers are the public's first point of contact. It is not anticipated that the drivers will encounter requests for language assistance; nor is it believed that the drivers will encounter a person with LEP that the call takers have not already documented for the coming year's Four-Factor Analysis. Nevertheless, in the interest of ensuring that all LEP encounters are documented and all patrons are provided with meaningful drivers will have access to the LLS number to call for assistance.

If a driver encounters a person with LEP who needs language assistance, she/he should contact the Transit Supervisor (or designee). In the event, **Spanish** language assistance is needed, the Transit Supervisor will utilize bilingual staff to provide interpretation. Thereafter, the Operations Manager will relay the date of the encounter and the type of assistance provided to the Program Director for inclusion in the next year's Four-Factor Analysis.

In the event that a driver encounters a person needing language assistance for a **language other than Spanish**, the driver should contact the Transit Supervisor (or designee). The Transit Supervisor will thereafter contact the Program Director who will attempt to secure a volunteer through LLS to provide the requested language assistance. Volunteer assistance is not guaranteed for languages other than Spanish. In the event assistance is located, it will be provided to the person with LEP free of cost. The Program Director will be responsible for documenting the date of the encounter, the type of assistance sought and the language spoken. This data will be analyzed in the next year's Four-Factor Analysis.

5. Instructions for CATS staff on how to respond to persons with LEP: Staff that serve persons with weak English skills should first utilize the LLS number to have a volunteer provided to them to identify the type of language encountered.

Bilingual staff will be utilized to provide interpretation in the event, **Spanish** language assistance is sought. The date of the encounter and the type of assistance must be provided in writing to the Program Director for inclusion in the next year's Four-Factor Analysis.

In the event staff encounters a person needing language assistance for a **language other than Spanish**, the Program Director must be notified. Thereafter, the Program Director will attempt to secure a volunteer the LLS who can provide the requested language assistance. Volunteer assistance for languages other than Spanish is not guaranteed, but in the event it is located, it will be provided to the person with LEP free of cost. The Program Director will be responsible for documenting the date of the encounter, the type of assistance sought and the language spoken. This data will be analyzed in the next year's Four-Factor Analysis.

6. Competency of the Interpreter and/or Translator: In instances where **Spanish** language assistance is needed, bilingual staff, with a competency in bilingualism, will first be utilized. In the event these resources are not immediately available, the Program Director will utilize a volunteer from the Ohio State LLS.

In instances where assistance is needed for a **language other than Spanish**, a volunteer will be sought from the Ohio State LLS. The Community Action Transit System reserves the right to have the interpreter or translator demonstrate her or his ability to communicate and/or translate information in both English and the other language. The Community Action Committee of Pike County will provide direct assistance to the interpreter or translator so that person has insight regarding system operations, policies, activities, etc. The Community Action Committee of Pike County will instruct the interpreter or translator that he or she should not deviate into a role as counselor, legal advisor or any other role aside from interpreting or translating. The Community Action Committee of Pike County will ask the interpreter or translator to attest that he or she does not have a conflict of interest related to the matter at hand.

The person with LEP has 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 by CATS. "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.

If a timely request is made, qualified outside resources may be used for interpreting services at public or informal meetings or events.

LEP PLAN APPROVAL:

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

Staff Most Likely to Have an LEP Encounter

Staff	Anticipated Point of Contact
CATS Scheduler/Dispatcher	When a person schedules a trip
CATS Driver	During a trip (if the passenger has questions/concerns about system operations or the service provided)
Community Action Committee of Pike County Staff	When a passenger seeks information about the transit system
Community Action Committee of Pike County Staff	At the time an individual wishes to make a complaint
Mobility Manager	When a person secures a transit ID card
CATS Program Director	To arrange for language assistance at a public hearing or to provide public comment

2. LEP Training for Staff: The LEP plan will be:
 - Distributed to all CATS staff and affected Community Action Committee of Pike County staff.
 - Available for public review at the CATS Transit Facility, 508 Howard St., Waverly , OH.
 - Posted on the CATS website, www.catsservices.org
 - Explained in CATS Staff orientation and training.
 - Made available to CATS and Community Action Committee of Pike County staff as revisions/updates to the LEP Plan occur.

PROVIDING NOTICE TO LEP PERSONS:

Public hearing notices currently include the following statement. “Please contact Diane Renner at (740) 835-8474 if you will need copies of the detailed service descriptions and project budgets in an alternate form”.

MONITORING:

The Community Action Transit System will utilize the Transit Advisory Committee (TAC) to review the plan annually--prior to the grant submission process. The review will include:

1. Annual review of the LEP encounters track during the calendar year.
2. Annual review of Four-Factor Analysis to ensure the data has not changed significantly therefore necessitating changes to the plan.

Community Action Transit System of Pike County

Transportation Advisory Council

Non-elected Officials Matrix by Race

Body	White	Black or African American	American Indian and Alaska Native	Asian	Native Hawaiian and Other Pacific Islander	Some Other Race	Two or More Races
Population	96.6%	0.9%	0.5%	0.2%	<0.1%	0.2%	1.6%
Transportation Advisory Council	99.9%	.1%	0%	0%	0%	0%	0%

- Participation is encouraged by attendance at the following partner/community meetings/events:
 - Pike County Continuum of Care
 - Pike County Community Fund Meetings
 - Pike County Senior Advisory Meetings
 - Pike County Human Service Council Meetings
 - Pike County Job and Family Service Planning Meetings
 - Health Fairs, Senior Day and Community Service Day at Pike County Senior Center