Great Lakes Community Action Partnership Transportation Resources for Independent People of Sandusky County (TRIPS) Title VI Program

Updated July 2024

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Great Lakes Community Action Partnership, Inc. operates TRIPS (Transportation Resources for the Independent People of Sandusky County. The TRIPS program is a public transportation provider for Sandusky County providing curb to curb service and low fare rides to employment, medical, shopping, etc. Shuttle services are also available throughout the city of Fremont. Rides must be scheduled 24 hours in advance. Wheelchair accessible vehicles based on availability.

Title VI Assurances

TRIPS agrees to comply with all provisions prohibiting discrimination based on race, color, or national origin of the Title VI of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000 et seq., and with U.S. DOT regulations, "Nondiscrimination in Federally-Assisted Programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act," 49 CFR part 21.

TRIPS assures that no person shall, as provided by Federal and State civil right laws, be excluded from participation in, be denied benefits of, or be subjected to discrimination under any program or activity. TRIPS further ensures every effort will be made to ensure non-discrimination in all programs and activities, whether those programs and activities are federally funded or not.

TRIPS meet the objectives of the FTA Master Agreement which governs all entities applying for FTA funding by promoting actions that:

- A. Ensure that the level and quality of transportation service is provided without regard to race, color, disability, or national origin.
- B. Identify and address, as appropriate, disproportionally high, and adverse effects of programs and activities on minority, low-income and special needs populations.
- C. Promote the full and fair participation of all affected Title VI populations in transportation decision making.
- D. Prevent the denial, reduction or delay in benefits related to programs and activities that benefit minority, low-income and special needs populations.
- E. Ensure meaningful access to programs and activities by persons with Limited English Proficiency (LEP).

Title VI Notice to the Public

Notifying the Public of Rights Under Title VI Great Lakes Community Action Partnership

Transportation Resources for the Independent People of Sandusky County

- GLCAP / TRIPS complies with all Civil Rights Laws and operate 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 VI may file a complaint with TRIPS, directly to the Ohio Department of Transportation or to the Federal Transit Administration.
- For more information on the TRIPS civil rights program, and the procedures to file a complaint, contact the EEO Coordinator at 419-333-6001 (TTY 800-750-0750) email Adrienne Fausey at comment@glcap.org, visit our administrative office at 127 S. Front Street, Fremont, OH 43420; or visit Comments | Great Lakes Community Action Partnership (glcap.org)
- 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 Division of Opportunity, Diversity and Inclusion, Office of Equal Opportunity, Attention: Title VI Program Manager, 1980 West Board St., Mail Stop 3270 Columbus, OH 43223 www.transportation.ohio.gov/TitleVI or to the U.S. Department of Transportation or its operating administrations (Federal Highway Administration or Federal Transit Administration, 1200 New Jersey Ave, SE Washington DC 20590.
- If information is needed in another language, contact 800-775-9767. Si se necesita más información en otro idioma, favor de comunicarse a 800-775-9767.

Listing of Title VI Posting Locations

- All vehicles:
 - $\circ~$ It is standard procedure to post in all vehicles before they are placed into service.
- All common public areas:
 - o Front lobby
- All common workplace areas:
 - o Driver break room
 - o Kitchen
- Agency websites postings are in English and Spanish.
 - o https://www.glcap.org/media/1k2l0e4q/glcap-title-vi-plan.pdf

Title VI Complaint Procedure

Any person who believes she or he has been discriminated against based on race, color, or national origin by <u>Great Lakes Community Action Partnership dba TRIPS</u> (hereinafter referred to as "GLCAP") may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. GLCAP investigates complaints received no more than 180 days after the alleged incident. GLCAP will process complaints that are complete.

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

GLCAP has 5 **business** days to investigate the complaint. If more information is needed to resolve the case, GLCAP may contact the complainant. The complainant has 5 business days from the date of the letter to send the 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 5 business days, GLCAP can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur. If the complainant wishes to appeal against the decision, she/he has **5 business** days after the date of the letter or the LOF to do so.

For transportation related Title VI matters, a person may also file a complaint directly with the Ohio Department of Transportation, at ODOT Office of Equal Opportunity, Attention: Title VI Coordinator, 1980 West Broad Street, Columbus, Ohio 43223.

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.

GLCAP Title VI Complaint Form

For those unwilling or unable to complete the online form at <u>Comments | Great Lakes Community</u> <u>Action Partnership (glcap.org)</u>, the following form can be sent to them for completion:

Section I:							
Name:							
Address:							
Telephone (Home):	Telephone	Telephone (Work):					
Electronic Mail Address:							
Accessible Format	Large Print		Audio Tape				
Requirements?	TDD		Other				
Section II:							
Are you filing this complaint of	on your own behalf?		Yes*	No			
*If you answered "yes" to thi	s question, go to Section	III.					
If not, please supply the nam	e 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	Yes	No				
aggrieved party if you are filing on behalf of a third party.							
Section III:							
I believe the discrimination I experienced was based on (check all that apply):							
[] Race [] Color	[] National Origi	n []	[] Sex				
[] Age [] Disabilit	y [] Low Income						
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 a	gency, or with ar	ny Federal or State court?				
[]Yes []No						
If yes, check all that apply:						
[] Federal Agency:						
[] Federal Court [] State Age	ncy					
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: Great Lakes Community Action Partnership Human Resources P.O. Box 590 Fremont, Ohio 43420

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

Background

Start Date: January 1, 2023 End Date: July 1, 2024

The following table documents all Title VI investigations, complains and/or lawsuits against Great Lakes Community Action Partnership/TRIPS alleging discrimination based on race, color, or national origin with respect to service or other transit benefits.

	Date (Month, Day, Year)	Summary (Include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations	NONE	N/A	N/A	N/A
1.				
2.				
Lawsuits	NONE	N/A	N/A	N/A
1.				
2.				
Complaints	NONE	N/A	N/A	N/A
1.				
2.				

Public Participation Plan

The purpose of the this public participation plan, in accordance with Federal Transit Administration (FTA) Circular 4702.1B Title VI Requirements & Guidelines for FTA Recipients, is to promote public participation by all citizens of Sandusky county, Ohio including those form diverse racial backgrounds, with disabilities, limited English proficiency (LEP) skills and persons with low and moderate income levels, are included in active public participation opportunities related to the planning and implementation of TRIPS activities.

Title VI information will be included in future public hearings and notices. We have posted information onto our website, on public bulletin boards and in all our vehicles. We have also added Title VI information to our brochures. We continue to work with our local Job & Family Services, the other programs served by GLCAP, First Call for Help, Sandusky County Board of Developmental Disabilities, and GLCAP Senior Centers to engage minority and limited English proficient populations in Sandusky County. Drivers notify dispatch if an

interpreter is needed. Dispatch contacts the staff person with bilingual capabilities or identifies an interpreter.

The goal of the public participation plan is to inform the public regarding GLCAP's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI. Elements of the plan include posting a Title VI notice on the agency's website and in public areas of the GLCAP's offices, and on vehicles.

- A. Outreach efforts include engaging minority and limited English proficient populations through Sandusky County. Some of the agency's targeted that serve these clients include:
 - a. DJFS We continue to work with our local Job & Family Services
 - b. GLCAP information is distributed through the other departments throughout GLCAP (i.e., Head Start, Seniors, Housing, etc.)
 - c. First Call for Help
 - d. Sandusky County Board of Developmental Disabilities
 - e. GLCAP Seniors Centers
- B. Transit Riders:
 - a. Drivers notify dispatch if an interpreter is needed.
 - b. Dispatch contacts the staff person with bilingual capabilities or seeks assistance from the Rural Transit Director to identify an interpreter. We are working with Terra Community College and are also able to use teachers from local school districts when those individuals are available for translation. In addition, GLCAP has partnered with an advocacy group that has helped us promote information to the Spanish speaking community.
 - c. TRIPS utilizes interpreter services available through Language Line Personal Interpreter Service at 1-888-808-9008, at no cost to any public transit rider.
- C. Title VI information is included in public hearings and notices.
- D. Title VI information is included in the Transit brochures.
- E. Postings:
 - a. Website We have posted information onto the GLCAP website,
 - b. Public bulletin boards postings in the GLCAP/TRIPS lobby at 2317 Countryside Drive, Fremont, Ohio; GLCAP Main Office, 127 South Front Street, Fremont, Ohio.
 - c. Vehicles- Postings in fleet of public transit vehicles.

GLCAP/TRIPS attends various community events and provides presentations to local community groups to assist in gathering information and feedback on services frequently sought by LEP and the special needs population.