

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

**Area Agency on Aging 3**

**January 2023**

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

## **Title VI Plan Table of Contents**

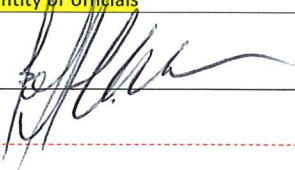
The **Insert Agency Name** Title VI plan includes the following elements:

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**Section 1: Title VI Plan Approval & Compliance Requirements**

Title VI Plan  
Adopted on: (Insert date) 2/28/2023

Adopted by: Name of Board or appropriate governing entity or officials

Signature(s): 

Approval: \_\_\_\_\_

**Commented [SJ1]:** Include documentation of plan approval, i.e. meeting minutes, signatures, etc. NOTE - Do not take this before your governing board until ODOT has approved the draft version.

**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.

Area Agency on Aging 3 will remain in compliance with this requirement by annual submission of certifications and assurances as required by NHDOT.

The date of last submission of these certifications and assurances (at the time of this Plan's approval) is: May 11, 2022

**Title VI Plan Revision Log**

Date Month/day/year	Section Revised	Summary of Revisions
1/17/23	Entire plan – all sections	Creation of entire Title VI Plan

**Section 2: Title VI Policy Statement**

**Policy Statement**

Area Agency on Aging 3, operating Third Party Contracting, 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. Area Agency on Aging 3 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**

Area Agency on Aging 3's Notice to the Public is as follows:

### **Notifying the Public of Rights Under Title VI**

## **Area Agency on Aging 3**

- The **Area Agency on Aging 3** 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 **Area Agency on Aging 3**.
- For more information on the **Area Agency on Aging 3's** civil rights program, the procedures to file a complaint, or to file a complaint, please contact **Beca Sheidler, Vice President of Aging In Place** at **419-222-7723 (Toll free at 1-800-653-7723)**; email [bsheidler@psa3.org](mailto:bsheidler@psa3.org); or visit our administrative office at **2423 Allentown Rd. Lima, OH 45805**. For more information, visit [www.aaa3.org](http://www.aaa3.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](http://www.ohdot.gov) West Broad Street, Mailstop 3270, Columbus, Ohio 43223

Federal Transit Administration, Office of Civil Rights, Attention: Complaint Team, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

- If information is needed in another language, contact **419-222-7723**.

Area Agency on Aging 3's Notice to the Public is posted in the public areas of the office.

1. Main agency front desk
2. Dahill Building receptionist area
3. [www.aaa3.org](http://www.aaa3.org)

#### **Section 4: Title VI Complaint Procedure**

Area Agency on Aging 3's Title VI Complaint Procedure is made available in the following locations:

- Agency website, if available: [www.aaa3.org](http://www.aaa3.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 Area Agency on Aging 3 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 Area Agency on Aging 3 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, Area Agency on Aging 3 will review it to determine if our office has jurisdiction. A copy of each Title VI complaint received will be forwarded to the New Hampshire 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.

Area Agency on Aging 3 has 45 days to investigate the complaint. If more information is needed to resolve the case, Area Agency on Aging 3 may contact the complainant requesting further information. 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, Area Agency on Aging 3 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, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

If information is needed in another language, then contact 419-222-7723.



**Section 5: Title VI Complaint Form**

Area Agency on Aging 3's Title VI Complaint Procedure is made available in the following locations:

- Agency website, if available: [www.aaa3.org](http://www.aaa3.org)
- Hard copy in the central office
- Agency Title VI Plan

<b>Section I:</b>			
Name:			
Address:			
Telephone (Home):		Telephone (Work):	
Email Address:			
Accessible Requirements?	Format	Large Print TDD	Audio Tape Other
<b>Section II:</b>			
Are you filing this complaint on your own behalf?		Yes*	No
*If you answered "yes" to this question, go to Section III.			
If not, please supply the name and relationship of the person for whom you are complaining:			
Please explain why you have filed for a third party:			
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.		Yes	No
<b>Section III:</b>			
I believe the discrimination I experienced was based on (check all that apply):			
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin			
Date of Alleged Discrimination (Month Day, Year) _____			
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.			
<b>Section IV</b>			
Have you previously filed a Title VI complaint with this agency?		Yes	No
<b>Section V</b>			
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.
<b>Name:</b>
<b>Title:</b>
<b>Agency:</b>
<b>Address:</b>
<b>Telephone:</b>
<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

If information is needed in another language, contact 419-222-7723.

Please submit this form to:

**Area Agency on Aging 3**  
**2423 Allentown Rd. Lima, OH 45805**  
**419-222-7723**  
**bsheidler@psa3.org**

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

Area Agency on Aging 3 maintains a list or log of all Title VI investigations, complaints and lawsuits, pertaining to its transit-related activities.

**Check One:**

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
<b>Investigations</b>				
1.				
2.				
<b>Lawsuits</b>				
1.				
2.				
<b>Complaints</b>				
1.				
2.				

**Section 7: Public Participation Plan**

**Strategies and Desired Outcomes**

To promote inclusive public participation, **Area Agency on Aging 3** 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 **Area Agency on Aging 3** since the last Title VI Program submission are summarized in the table below.

Specific Public Participation activities are listed in the table below:

<b>Event Date</b>	<b>Insert Agency Name Staffer(s) or Department</b>	<b>Activity</b>	<b>Communication Method (Public notice, posters, social media)</b>	<b>Notes</b>
1/12/2021	Beca Sheidler, VP, Aging in Place	FACTS Coalition Meeting	Email	
11/16/2021	Stefanie Motter, Mobility Manager	FACTS Coalition Meeting	Email	
2/24/2022	Stefanie Motter, Mobility Manager	FACTS Coalition Meeting	Email	
3/31/2022	Stefanie Motter, Mobility Manager	Delphos Senior Center, Needs Assessment	Delphos Senior Center	
4/7/2022	Stefanie Motter, Mobility Manager	Putnam County Transportation Planning Coalition	Putnam COA	
1/20/2021 5/2/2022 7/18/2022	Beca Sheidler, VP, Aging in Place and	Hancock Transportation Coalition	HATS	

	Stefanie Motter, Mobility Manager			
5/5/2022 8/1/2022	Stefanie Motter, Mobility Manager	Regional Transportation Coalition Meeting	HATS	
5/12/2022 6/9/2022 10/13/2022 11/10/2022	Stefanie Motter, Mobility Manager	COLT Meeting	COLT	
4/14/2021 6/1/2022 10/19/2022	Beca Sheidler, VP, Aging in Place and Stefanie Motter, Mobility Manager	Hardin County Coordinated Transportation Planning meeting	Putnam COA	
6/22/2022 9/30/2022	Stefanie Motter, Mobility Manager	Putnam County 5311 discussion meeting	Putnam COA	
7/26/2022	Stefanie Motter, Mobility Manager	Independence Fair	Allen County Board of DD, Flyers, social media	
9/6/2022	Stefanie Motter, Mobility Manager	GRMI &HSTC Joint Council meeting	Email, social media	
9/29/2022	Stefanie Motter, Mobility Manager	FACTS Coalition meeting	Email	
12/8/2022	Stefanie Motter, Mobility Manager	FACTS Coalition meeting	Email	
12/13/2022	Stefanie Motter, Mobility Manager	Mercer County Transportation Coalition	Email, Mercer DD	
3/10/2022 8/11/2022	Stefanie Motter, Mobility Manager	Citizen's Accessibility Advisory Committee	Email, Letter	

## **Section 8: Language Assistance Plan**

### ***Plan Components***

As a recipient of federal US DOT funding, **Area Agency on Aging 3** 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.

**Area Agency on Aging 3's** 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, **Area Agency on Aging 3** 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, **Area Agency on Aging 3** 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 **Area Agency on Aging 3's** 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 96,278 residents in Area Agency on Aging 3’s service area in Allen County who are over the age of 5, 836 residents describe themselves as speaking English less than “very well”. People of Hispanic descent are the primary LEP persons likely to utilize Area Agency on Aging 3 services. For Area Agency on Aging 3’s Allen County service area, the latest U.S. Census Bureau data shows that among the area’s population 0.9% speak English “less than very well.” **For these groups** who speak English “less than very well”, 46.9% speak ‘Spanish’.

**Allen – Languages Spoke at Home**

	Total Number	Percent of Population	Total Population (over 5) of County
Speak Language other than English	3,009	3.1%	96,278
Speak English Less than Very Well	836	.9%	96,278
Spanish	1,436	1.5%	96,278
Other Indo-European Languages	644	.7%	96,278
Asian and Pacific Island Languages	556	.6%	96,278
Other Languages	373	.4%	96,278

2021: American Community Survey 1-Year Estimate; S1601 – Languages Spoken at Home

Of the 43,406 residents in Area Agency on Aging 3’s service area in Auglaize County who are over the age of 5, 184 residents describe themselves as speaking English less than “very well”. People of Hispanic descent are the primary LEP persons likely to utilize Area Agency on Aging 3 services. For Area Agency on Aging 3’s Auglaize County service area, the latest U.S. Census Bureau data shows that among the area’s population 0.4% speak English “less than very well.” **For these groups** who speak English “less than very well”, 65.2% speak Spanish.

**Auglaize – Languages Spoke at Home**

	Total Number	Percent of Population	Total Population (over 5) of County
Speak Language other than English	886	2.0%	43,406
Speak English Less than Very Well	184	.4%	43,406

Spanish	417	1.0%	43,406
Other Indo-European Languages	315	.7%	43,406
Asian and Pacific Island Languages	142	.3%	43,406
Other Languages	12	0%	43,406

2021: American Community Survey 1-Year Estimate; S1601 – Languages Spoken at Home

Of the 70,480 residents in Area Agency on Aging 3’s service area in Hancock County who are over the age of 5, 1266 residents describe themselves as speaking English less than “very well”. People of Hispanic descent are the primary LEP persons likely to utilize Area Agency on Aging 3 services. For Area Agency on Aging 3’s Hancock County’s service area, the latest U.S. Census Bureau data shows that among the area’s population 1.8% speak English “less than very well.” **For these groups** who speak English “less than very well” 43.3% speak Spanish.

**Hancock – Languages Spoke at Home**

	Total Number	Percent of Population	Total Population (over 5) of County
Speak Language other than English	3,633	5.2%	70,480
Speak English Less than Very Well	1,266	1.8%	70,480
Spanish	1,720	2.4%	70,480
Other Indo-European Languages	343	.5%	70,480
Asian and Pacific Island Languages	1,113	1.6%	70,480
Other Languages	457	.6%	70,480

2021: American Community Survey 1-Year Estimate; S1601 – Languages Spoken at Home

Of the 28,989 residents in Area Agency on Aging 3’s service area in Hardin County who are over the age of 5, 454 residents describe themselves as speaking English less than “very well”. People of Hispanic descent are the primary LEP persons likely to utilize Area Agency on Aging 3 services. For Area Agency on Aging 3’s Hardin County service area, the latest U.S. Census Bureau data shows that among the area’s population 1.6% speak English “less than very well.” **For these groups** who speak English “less than very well”, 37%% speak Spanish.

**Hardin – Languages Spoke at Home**

	Total Number	Percent of Population	Total Population (over 5) of County
Speak Language other than English	2,022	7.0%	28,989
Speak English Less than Very Well	454	1.6%	28,989
Spanish	434	1.5%	28,989
Other Indo-European Languages	1,216	4.2%	28,989
Asian and Pacific Island Languages	143	.5%	28,989
Other Languages	229	.8%	28,989

2021: American Community Survey 1-Year Estimate; S1601 – Languages Spoken at Home

Of the 39,054 residents in Area Agency on Aging 3’s service area in Mercer County who are over the age of 5, 268 residents describe themselves as speaking English less than “very well”. People of Hispanic descent are the primary LEP persons likely to utilize Area Agency on Aging 3 services. For Area Agency on Aging 3’s Mercer County service area, the latest U.S. Census Bureau data shows that among the area’s population 0.7% speak English “less than very well.” **For these groups** who speak English “less than very well”, 41.1% speak Spanish.

Approved 01/24/2023



**Mercer – Languages Spoke at Home**

	Total Number	Percent of Population	Total Population (over 5) of County
Speak Language other than English	808	2.1%	39,054
Speak English Less than Very Well	268	.7%	39,054
Spanish	243	.6%	39,054
Other Indo-European Languages	110	.3%	39,054
Asian and Pacific Island Languages	421	1.1%	39,054
Other Languages	34	.1%	39,054

2021: American Community Survey 1-Year Estimate; S1601 – Languages Spoken at Home

Of the 32,146 residents in Area Agency on Aging 3’s service area in Putnam County who are over the age of 5, 546 residents describe themselves as speaking English less than “very well”. People of Hispanic descent are the primary LEP persons likely to utilize Area Agency on Aging 3 services. For Area Agency on Aging 3’s Putnam County service area, the latest U.S. Census Bureau data shows that among the area’s population 1.7% speak English “less than very well.” For these groups who speak English “less than very well”, 74.5% speak Spanish.

**Putnam – Languages Spoke at Home**

	Total Number	Percent of Population	Total Population (over 5) of County
Speak Language other than English	1,326	4.1%	32,146
Speak English Less than Very Well	546	1.7%	32,146
Spanish	1,066	3.3%	32,146
Other Indo-European Languages	225	.7%	32,146
Asian and Pacific Island Languages	31	.1%	32,146
Other Languages	4	0%	32,146

2021: American Community Survey 1-Year Estimate; S1601 – Languages Spoken at Home

Of the 27,031 residents in Area Agency on Aging 3’s service area in Van Wert County who are over the age of 5, 173 residents describe themselves as speaking English less than “very well”. People of Hispanic descent are the primary LEP persons likely to utilize Area Agency on Aging 3 services. For Area Agency on Aging 3’s Van Wert County service area, the latest U.S. Census Bureau data shows that among the area’s population 0.6% speak English “less than very well.” For these groups who speak English “less than very well”, 57.8% speak Spanish.

**Van Wert – Languages Spoke at Home**

	Total Number	Percent of Population	Total Population (over 5) of County
Speak Language other than English	656	2.4%	27,031
Speak English Less than Very Well	173	.6%	27,031
Spanish	446	1.6%	27,031
Other Indo-European Languages	106	.4%	27,031
Asian and Pacific Island Languages	90	.3%	27,031
Other Languages	14	.1%	27,031

2021: American Community Survey 1-Year Estimate; S1601 – Languages Spoken at Home

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

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Area Agency on Aging 3 assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. Area Agency on Aging provides approximately 26,000 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.**

All of Area Agency on Aging 3's programs are important; however, those related to safety, public transit, nondiscrimination and public involvement are among the most important. Area Agency on Aging 3 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, Area Agency on Aging 3 will strive to provide alternative but meaningful accessibility. Moreover, Area Agency on Aging 3 continually evaluates its programs, services, and activities to ensure that persons who may be LEP are always provided with meaningful access. The Title VI policy, complaint form, and LEP policy are available in Spanish upon request.

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

Area Agency on Aging 3 makes every effort to make its programs, services, and activities, accessible to LEP individuals. Area Agency on Aging 3 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**

Area Agency on Aging 3 has identified, developed, and uses the following:

- a) Individuals who have contact with the public are provided with "I Speak" language cards to identify language needs in order to match them with available services. Language cards verified and distributed by the Director as need.
- b) Area Agency on Aging 3 has developed partnerships with local agencies, organizations, law enforcement, colleges/universities, local school districts and social service agencies that are available to assist with it LEP responsibilities.
- c) 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 Area Agency on Aging 3's language assistance measures, Area Agency on Aging 3 provides the following:

- Title VI Program including the Language Assistance Plan is made available on website, if applicable, and hard copy in central office.
- Drivers and dispatchers are provided "I Speak" language cards to identify language needs in order to match them with available services.

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

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Area Agency on Aging 3 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 Area Agency on Aging 3's 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 Area Agency on Aging 3's financial resources are sufficient to fund language assistance resources needed.
- Determine whether Area Agency on Aging 3 has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning Area Agency on Aging 3's 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 Area Agency on Aging 3 staff:

- Information on the Area Agency on Aging 3 Title VI Procedures and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of "I Speak" language cards (used to identify language preference).
- 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

Area Agency on Aging 3 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 Language Line to obtain translators. The agency will also utilize web-based translator programs if available.

**If you need help with English, please call 419-222-7723.+**

## "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 vaøo oã naøÿ neáu quyù vò bieát ñoic vaø noùi ñöðic Vieät Ngöð.	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.

**A. Minority Representation Table**

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

Body	Caucasian	Hispanic	African American	Asian American	Native American	Two or More Races
Allen County	79.01%	3.20%	12.30%	0.82%	0.29%	5.71%
FACTS Coalition	93.88%	2.04%	4.08%	N/A	N/A	N/A

Body	Caucasian	Hispanic	African American	Asian American	Native American	Two or More Races
Auglaize County	94.63%	1.68%	0.52%	0.82%	0.29%	3.29%
FACTS Coalition	93.88%	2.04%	4.08%	N/A	N/A	N/A

Body	Caucasian	Hispanic	African American	Asian American	Native American	Two or More Races
Hancock County	88.88%	5.60%	1.91%	1.87%	0.20%	5.09%
N/A	N/A	N/A	N/A	N/A	N/A	N/A

Body	Caucasian	Hispanic	African American	Asian American	Native American	Two or More Races
Hardin County	93.33%	2.18%	0.85%	0.55%	0.19%	3.81%
N/A	N/A	N/A	N/A	N/A	N/A	N/A

Body	Caucasian	Hispanic	African American	Asian American	Native American	Two or More Races
Mercer County	94.20%	2.18%	0.48%	0.44%	0.19%	2.57%
FACTS Coalition	93.88%	2.04%	4.08%	N/A	N/A	N/A

Body	Caucasian	Hispanic	African American	Asian American	Native American	Two or More Races
Putnam County	93.5%	6.4%	0.6%	0.1%	0.1%	1.8%
N/A	N/A	N/A	N/A	N/A	N/A	N/A

Body	Caucasian	Hispanic	African American	Asian American	Native American	Two or More Races
Van Wert County	94.19%	2.18%	0.48%	0.44%	0.19%	2.38%
FACTS Coalition	93.88%	2.04%	4.08%	N/A	N/A	N/A

**B. Efforts to Encourage Minority Participation**

*To encourage participation on its boards, committees, and councils, the Insert Agency Name will make every effort to encourage minority participation on the boards. Detail any further efforts below.*

**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.)

