

The City of Springfield – SCAT (Springfield City Area Transit) Title VI Program August 24, 2018

Title VI of the Civil Rights Act of 1964 ensures that public transportation and other FTA-funded service to the public are provided without regard to race, color and national origin. To help us verify that, FTA issued Circular 4702.1A in 2007, which requires recipients of FTA funds to submit a Title VI Program every three years. Chapter IV of the circular explains the policies, practices and procedures that FTA recipients must document to constitute a Title VI Program. The full circular can be found online at: www.fta.dot.gov/circulars

The City of Springfield – SCAT Non-Discrimination Policy

The City of Springfield – SCAT is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color, national origin, sex, disability, age, or sexual orientation as provided by Title VI of the Civil Rights Acts of 1964 (as amended), and/or by Springfield city policy.

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Introduction

This program reflects The City of Springfield – SCAT’s commitment to ensuring that no person shall be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity provided by the City of Springfield – SCAT on the grounds of race, color, national origin, religion, age, marital status, sexual orientation or disability.

Policy Statement

A policy statement assuring the City of Springfield – SCAT’s compliance with Title VI of the Civil Rights Act of 1964 can be found as **Attachment A**.

Title VI Discrimination Complaint Procedure

If you believe you have been excluded from participation in, denied the benefit of, or subjected to discrimination, you may file a written complaint within 90 days of the alleged occurrence to the City of Springfield – SCAT. In this written complaint, please include the following:

- Your name, address, and how to contact you (phone number, e-mail, etc.)
- How, why, when and where you believe you were discriminated against. Include the location, names, and contact information of any witnesses. If the alleged incident occurred on the bus, give date, time of day, and bus number if available.
- You must sign your letter of complaint

All complaints will be investigated promptly. Reasonable measures will be taken to preserve any information that is confidential. If necessary, a neutral party will be assigned to investigate. If a Title VI violation is found to exist, remedial steps as appropriate and necessary will be taken immediately. The investigation process and final report should take no longer than thirty (30) calendar days.

If the complainant is dissatisfied with the City of Springfield – SCAT’s resolution of the complaint, he/she has the right to file a complaint with the:

**Department Office of Civil Rights
U.S. Department of Transportation
400 7th Street, S.W., Rm #10215, S-30
Washington D.C. 20690**

**Phone: (202) 366-4648 or (202) 366-5992
TTY Access: (202) 366-9696
DC Relay: (202) 855-1000**

Record of Title VI Investigations, Complaints, or Lawsuits

At the time of adoption of this policy, there were no public transportation-related Title VI investigations, complaints, or lawsuits filed with the recipient. Should there be any public transportation-related Title VI investigations, complaints, or lawsuits filed with the recipient, documentation of the same, including the outcome, will be added to this program as an attachment.

Notification of The City of Springfield – SCAT’s Title VI Obligations

The City of Springfield – SCAT publicizes its Title VI program by posting its commitment to providing services without regard to race, color or national origin in all vehicles and the City of Springfield – SCAT facility. Further:

- The City of Springfield – SCAT does not discriminate in the operation of its programs on the basis of race, color or national origin.
- Please contact the city with questions or comments about our non-discrimination policies, or to get additional information or file a complaint, in person or by mail to:

Cheryl DeGroat Dover
Minority Business Development Coordinator
The City of Springfield, Community Development
76 East High Street
Springfield, Ohio 45502
Phone: 937.324.7380
Fax: 937.328.3489 Email: cdover@springfieldohio.gov

It is the City of Springfield – SCAT’s objective to:

Ensure that the level and quality of service is provided without regard to race, color or national origin.

Identify and address, as appropriate, disproportionately high and adverse human health and environmental effects, including social and economic effects of programs and activities on minority populations and low-income populations.

Promote the full and fair participation of all affected populations in transportation decision making.

Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations.

Ensure meaningful access to programs and activities by persons with limited English proficiency.

The City of Springfield – SCAT Limited English Proficiency (LEP) Plan

Analysis of the 2010 U.S. Census data (updated below with 5 year estimates) shows that individuals speaking English “less than very well” represents approximately 1.0% of the population in Springfield Ohio.

Springfield City, Ohio

Subject	Total	Percent of specified language speakers	
		Speak English “very well”	Speak English less than “very well”
	Estimate	Estimate	Estimate
Population 5 years and over	55,572	99.0%	1.0%
Speak only English	95.7%	(X)	(X)
Speak a language other than English	4.3%	76.8%	23.2%
Spanish	2.6%	74.9%	25.1%
Other Indo-European languages	1.0%	81.6%	18.4%
Asian and Pacific Island languages	0.5%	66.9%	33.1%
Other languages	0.3%	91.0%	9.0%
SPEAK A LANGUAGE OTHER THAN ENGLISH			
Spanish	1,437	74.9%	25.1%
Other Indo-European languages	533	81.6%	18.4%
Asian and Pacific Island languages	251	66.9%	33.1%
Other languages	189	91.0%	9.0%
CITIZENS 18 YEARS AND OVER			
All citizens 18 years and over	45,001	99.5%	0.5%
Speak only English	43,552	(X)	(X)
Speak a language other than English	1,449	84.3%	15.7%
Spanish	810	81.1%	18.9%
Other languages	639	88.3%	11.7%

Source: U.S. Census Bureau, 2012-2016 American Community Survey 5-Year Estimates

Explanation of Symbols:

An '(X)' means that the estimate is not applicable or not available.

SCAT Springfield City Area Transit

LIMITED ENGLISH PROFICIENCY (LEP) PLAN

PURPOSE: The purpose of this plan is to provide guidelines to ensure that the Springfield City Area Transit takes responsible measures to ensure meaningful access to the benefits, services, information, and other important programs and activities of the SCAT for individuals who are Limited English Proficient (LEP).

LEP POPULATION IN SPRINGFIELD, OHIO: Data from the U.S. Census Bureau's 2010 Census data (as updated with 5 year estimates) indicates that the percentage of persons in Springfield, Ohio, that are over the age of five (5) years and speak a language other than English in the home, is approximately 4.3%, and only 1.0% speak English less than "very well". From this group, the single language other than English that is spoken in the greatest number of households is Spanish, with 2.6 % of the population of Springfield, Ohio speaking Spanish in the home. A copy of the table from which this information was obtained is included with Springfield's Title VI Program.

IDENTIFYING PERSONS that are LIMITED ENGLISH PROFICIENT: Should any staff person that is carrying out duties on behalf of the SCAT come in contact with a person that they believe to be LEP, that staff person shall make reasonable efforts to arrange for a means of effective communication in the language of the LEP individual. For in person contact, a copy of the U.S. Census Bureau's "Language Identification Flashcard", or other similar language identification tool, will be made available as quickly as possible to aid in identifying the language spoken by the LEP individual.

INTERPRETER SERVICES: The SCAT currently has in place, and will maintain, an agreement to provide over the phone interpreter service. This phone interpreter service will be provided at no cost to any person limited in English proficiency that is seeking the services of the SCAT. This service shall be provided in an efficient and timely manner so as not to delay transportation services beyond that of an English speaking person.

TRANSLATION OF DOCUMENTS: The SCAT shall have copies of vital documents, such as time schedules and rider policies, available in any alternate language spoken in the home, that comprises at least 5% of the population of Clark County. At this time, the SCAT is not aware of any such population/language group.

DISSEMINATION OF INFORMATION: The SCAT shall inform all staff of the requirements of this plan and shall provide training on communication with LEP persons as part of the initial employee training. The SCAT shall post signs at the transit center and the bus garage that inform the public of the availability of the interpreter services.

SCAT Springfield City Area Transit

LIMITED ENGLISH PROFICIENCY (LEP) FOUR FACTOR ANALYSIS

The Springfield City Area Transit service area is comprised of areas of the City of Springfield and portions of contiguous townships within Clark County, Ohio. The remainder of Clark County is not within the SCAT service area. For this analysis, only the populations that are located in these areas will be considered.

(1) The number of persons or proportion of LEP persons eligible to be served or likely to be encountered by the program.

According to the U.S. Census Bureau's American Fact Finder, the population over the age of five (5) years that resides in this defined service area totals 55,572 persons. A table is included here which shows, by language, the number of persons that are identified as speaking English less than "very well". Of these persons, the largest group speaks Spanish, with 559 persons being identified. This comprises approximately 1% of the population.

The SCAT recognizes that persons of limited English proficiency may come in contact with bus drivers, schedulers, dispatchers, and managers, in person or over the telephone.

In the urban area that is served by SCAT, there are no distinct areas or neighborhoods that are identified as having persons that are less than proficient using the English language.

Because there is no group that comprises at least 5% of the population or a total of 1,000 persons, SCAT does not offer alternate written translation of any documents.

SCAT has not observed, or been notified of any LEP persons that are underserved due to language barriers.

There have been no facility projects completed in the last three (3) years that are covered by this analysis.

(2) The frequency with which LEP persons come into contact with SCAT personnel.

The contact with persons of limited English proficiency is observed as being infrequent in all aspects of contact with transit personnel.

(3) The nature and importance of the program, activity, or service provided by the program to people's lives.

In the urban area that is served by SCAT, most riders use the services because they are not physically, cognitively, or financially able to operate a personal vehicle. The fixed route system is used by individuals that are able to do so. Para-transit service is available for those persons having a disability that limits their ability to use the fixed route system.

(4) The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.

The SCAT's existing LEP plan outlines a partnership for over-the-phone interpreter services. This service is available to the SCAT on a "pay if used" based.

From this analysis, there are no additional actions identified that would require the SCAT to modify the existing Limited English Proficiency Plan at this time.

The SCAT works closely with the local Metropolitan Planning Organization (MPO) known as the Clark County – Springfield Transportation Coordinating Committee (TCC), which monitors population trends on a regular basis. Using this resource, should there be an identified marked increase within the service area or any new area of service, of any alternate language speaking population, the LEP Analysis and Plan will be appropriately updated.

The City of Springfield – SCAT Service Standards

Vehicle Load

Fixed Route	Less than or equal to 1.25 passengers per seat
Demand Response	Less than or equal to 1.0 passengers per seat

Vehicle Headway

Fixed Route	Less than or equal to 60 minutes
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On-Time Performance

	Acceptable Early	Acceptable Late	Minimum Standard On-Time
Fixed Route	0-1 minutes	0-4 minutes	97%
Demand Response	0-15 minutes	0-15 minutes	97%

Service Availability

Fixed Route	Distribute transit service so that 90% of all residents in the area are within ¼ mile of bus service.
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The City of Springfield – SCAT Service Policies

Transit Amenities Policy

Installation of transit amenities along bus routes are based on number of passenger boardings at stops along the routes

Vehicle Assignment Policy

A dispatcher is responsible for making bus assignments and replacements. In larger systems, this may be performed by a hostler or other maintenance personnel. A vehicle availability board should be available to facilitate communication between dispatch and maintenance, with all vehicles assumed to be available unless noted otherwise. The board should indicate vehicles pulled from service for repair or inspection, the date to be pulled from service and the date available to return to service. Also, the board should note vehicles with only marginal, non-safety related malfunctions, that could be available for service in emergency situations.

Public Participation Plan

The local MPO (Clark County – Springfield Transportation Coordinating Committee) has a public participation plan that covers the SCAT. The first five pages of this plan are represented by Attachment C. For the full plan, please visit www.clarktcc.com/pubinvolve.htm.

Committees and Council Memberships

The City of Springfield, Ohio is governed under a council-manager form of government with operational matters under the direction and oversight of the City Manager. There are no committees or councils overseeing operations of the City of Springfield – SCAT.

Subrecipients

The City of Springfield is the primary recipient and does not use subrecipients.

Title VI Equity Analysis for Construction

The City of Springfield – SCAT has not constructed any qualifying facilities during the review period.

City of Springfield – SCAT

Title VI

Non-Discrimination – Policy Statement

The City of Springfield – SCAT is committed to ensuring that no person is excluded from participation in, or denied the benefits of, or be subject to discrimination in the receipt of its services or programs on the basis of race, color or national origin or any other characteristics protected by law, including Title I of the Civil Rights Act of 1964, as amended. Further, under the Americans with Disabilities Act (ADA) of 1990, no entity shall discriminate against an individual with a physical or mental disability in connection with the provision of transportation service.

To file a Title VI complaint, contact the City of Springfield’s Community Development Department through:

Cheryl DeGroat Dover
Minority Business Development Coordinator
The City of Springfield, Community Development
76 East High Street
Springfield, Ohio 45502
Phone: 937.324.7380
Fax: 937.328.3489 Email: cdover@springfieldohio.gov

Attachment B

Title VI Complaint Form

The City of Springfield – SCAT

Name: _____

Address: _____

City: _____ State: _____ Zip: _____

Home Phone: _____

Work Phone: _____

Were you allegedly discriminated against because of:

- Race
- National Origin
- Color
- Other: _____

Date of alleged incident: _____

Explain as **clearly as possible** what happened and how you were discriminated against. Indicate **who was involved**. Be sure to include **the names and contact information of any witnesses**. If more space is needed please use the back of the form.

Have you filed this complaint with any other federal, state, or local agency or with any federal state court? Yes No

If yes, check all the 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: _____

Address: _____

City, State and Zip Code: _____

Telephone: _____

Please sign below. You may attach any written materials or other information that you think is relevant to your complaint.

Signature

Date

Please mail or bring this form to:

**Cheryl DeGroat Dover
Minority Business Development Coordinator
The City of Springfield, Community Development
76 East High Street
Springfield, Ohio 45502**



CLARK COUNTY-SPRINGFIELD
TRANSPORTATION COORDINATING COMMITTEE

Public Participation Plan

March 2018



Transportation Coordinating Committee

Chair

Elmer Beard

Council Member, Village of Enon

Vice Chair

Kathy Estep

Trustee, Mad River Township

Bob Bender

Human Services and Coordinated Transportation Advisory Committee (HSCTAC) Chair

Nancy Brown

Trustee, Bethel Township

John Burr

Clark County Engineer

Leann Castillo

Local Officials, Government, and Citizens Advisory Committee (LOGCAC) Chair

Joyce Chilton

Springfield City Commission

David Estrop

Springfield City Commission

Richard Henry

WESTCO Port Authority

Howard Kitko

Technical Advisory Committee (TAC) Chair

William Lindsey

City of New Carlisle

Lowell McGlothlin

Clark County Commission

Matt Parrill

ODOT District 7



Transportation Staff

Scott Schmid

Transportation Director

Louis Agresta

Transportation Planner

Glen Massie

Transportation Planner

Cory Lynn Golden

Transportation Planner

Melanie Runkel

Transportation Planner

Brian Mercer

Fiscal Officer

Phone	937-521-2128
Email	ccstcc@clarkcountyohio.gov
Website	http://www.clarktcc.com
Address	3130 E. Main St., Suite 2A Springfield, OH 45505

This report was prepared in cooperation with the U.S. Department of Transportation's Federal Highway Administration and Federal Transit Administration, the Ohio Department of Transportation, the Ohio Public Works Commission, the West Central Ohio Port Authority, transit and rail freight service providers, and the local governments of Clark County.

The preparation and publication of this document was financed cooperatively by the Federal Highway Administration, the Federal Transit Administration, the Ohio Department of Transportation, West Central Ohio Port Authority and local governments of Clark County.

The contents of this Plan reflect the views of the Clark County-Springfield Transportation Study, which is responsible for the facts and the accuracy of the data presented herein. The contents do not necessarily reflect the official view and policies of the Ohio Department of Transportation or the U.S. Department of Transportation. This Plan does not constitute a standard, specification or regulation.



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Section 1 - Introduction

Background

The Clark County-Springfield Transportation Coordinating Committee (TCC) was established in February 1964 to comply with the requirements of the Federal-Aid Highway Act of 1962. The TCC is the Metropolitan Planning Organization (MPO) responsible for transportation planning in the Clark County-Springfield area as designated by the Ohio Department of Transportation acting in behalf of the Governor in accordance with federal law (23 USC 134). The study area encompasses all political subdivisions in Clark County with a total population of 138,333.

The MPO is the forum for cooperative transportation decision-making by the principal elected officials of general purpose local government. The TCC is composed of local elected and appointed officials, transportation professionals, and citizen members. The TCC reviews and approves plans and programs involving expenditures of Federal-aid transportation funds in Clark County.

The TCC is responsible for meeting all the federal requirements of the cooperative, comprehensive and continuing transportation planning process, which became known as the 3-C process. The 3-C process was first required by the 1962 Surface Transportation Assistance Act and 1964 Federal Transit Act. The TCC staff maintains this planning process through work elements that are developed annually for the Planning Work Program (PWP). The PWP describes the work necessary to maintain the transportation planning process and serves as a budgeting mechanism. The transportation planning process implemented through the PWP is described in the Prospectus, dated November 2015.

As the MPO, the TCC must fulfill the requirements of the planning regulations for the Clark County-Springfield area to maintain eligibility for Federal highway and transit funds through the Ohio Department of Transportation. Fixing America's Surface Transportation Act (FAST Act), herein referred to as "Current Legislation" recognizes that transportation improvements impact the economy, environment, and community quality of life. Furthermore, current legislation as an ongoing provision of previous transportation bills, MAP-21 and SAFETEA-LU, documents eight metropolitan transportation planning factors:

- *Support the economic vitality of the United States, the States and metropolitan areas, especially by enabling global competitiveness, productivity and efficiency;*
- *Increase the safety of the transportation system for motorized and non-motorized users;*

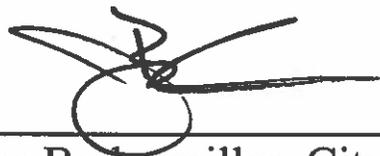
Attachment D

CITY MANAGER'S JOURNAL ENTRY

RE: City of Springfield – SCAT Title VI Program

DATE: August 24, 2018

By authority granted to me as City Manager, the City of Springfield and the Springfield City Area Transit (SCAT) hereby adopt a revised SCAT Title VI Program, and Limited English Proficiency (LEP) Plan for Federal Transit Administration recipients, effective August 24, 2018, as detailed in the attached documents.



Jim Bodenmiller, City Manager