

**B.G. TRANSIT**  
**TITLE VI PROGRAM**

**August 31, 2018**

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## **Title VI Notice to the Public**

## Notifying the Public of Rights Under Title VI

### THE CITY OF BOWLING GREEN

- The City of Bowling Green 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 City of Bowling Green.
- For more information on The City of Bowling Green's civil rights program, and the procedures to file a complaint, contact (419) 354-6203, (TTY 800-750-0750; email [bggrants@bgohio.org](mailto:bggrants@bgohio.org)); or visit our administrative office at 304 North Church Street, Bowling Green, Ohio 43402. For more information, visit <https://www.bgohio.org/departments/municipal-administrator/grants-administration/public-transportation/>.
- 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, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.
- If information is needed in another language, contact (419) 354-6203.

#### **List of locations where Title VI Notice to the Public is posted**

- On City of Bowling Green website (B.G. Transit page):  
<https://www.bgohio.org/departments/municipal-administrator/grants-administration/public-transportation/>
- Second Floor (where B.G. Transit ID Cards are issued), City of Bowling Green Administrative Services Building, 304 North Church Street, Bowling Green, OH 43402
- On all seven B.G. Transit vehicles

# **TITLE VI COMPLAINT PROCEDURE**

B.G. Transit

Policy Manual

304 North Church Street, Bowling Green, Ohio 43402

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SUBJECT: **TITLE VI AND GENERAL COMPLAINT PROCEDURES** SECTION: Customer Service

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EFFECTIVE DATE: 8/18/15 REPLACES: Policy adopted 11/20/12  
APPROVED BY: Transportation Advisory Committee

APPROVAL DATE: 8/18/15

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DIRECTIVE:

To establish a method for passengers to communicate complaints; including all complaints filed under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990, for alleged discrimination in any program or administered by the City of Bowling Green.

Procedure:

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the City of Bowling Green (B.G. Transit) (hereinafter referred to as “the Agency”) may file a Title VI complaint by completing and submitting the agency’s Title VI Complaint Form. The Agency investigates complaints received no more than 180 days after the alleged incident. The Agency will process complaints that are complete.

Once the complaint is received, the Agency 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.

The Agency has 15 days to investigate the complaint. If more information is needed to resolve the case, the Agency may contact the complainant. The complainant has 15 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 15 business days, the Agency 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 the decision, she/he has 15 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 St., Columbus, OH 43223.

For transportation-related Title VI matters, a person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Avenue SE, Washington, DC 20590.

A. SUBMITTING A COMPLAINT (GENERAL AND TITLE VI)

1. Complaint Procedure

- a. If information is needed in another language, then contact 419-354-6203. Copies of the B.G. Transit Complaint Report form and accompanying procedure for making complaints (including those related to Title VI) will be kept in each transit vehicle. Drivers shall provide these forms to patrons wishing to make a complaint (including Title VI complaints). The completed Complaint Report should be mailed, faxed or hand delivered to the City's Grants Administrator.
- b. The Complaint Report form and procedure are also posted on the City's website (<https://www.bgohio.org/departments/municipal-administrator/grants-administration/public-transportation/>). These documents can be downloaded, printed and completed for submission as well.
- c. City of Bowling Green staff who encounter persons wishing to make a complaint (either in speaking with them in person or on the telephone) shall provide them with a Complaint Report form and procedure.
- d. Complaints:
  - 1) Must be in writing (using the City's B.G. Transit Complaint Report form);
  - 2) Must be signed and dated;
  - 3) Title VI complaints must be submitted within 180 calendar days; all other complaints must be submitted within 15 calendar days of the date of offense; and
  - 4) Must be submitted to the:

Grants Administration Division  
City Administrative Services Building  
304 N. Church Street  
Bowling Green, Ohio 43402

In the case where a complainant is unable or incapable of providing a written statement, a verbal complaint may be made to the City of Bowling Green Grants Administrator, Grants Administrative Secretary or, in both parties' absence, any other available staff. Under these circumstances, the complainant will be interviewed and the staff person receiving the complaint will convert the verbal allegations to writing. The staff person recording the complaint will sign and date the B.G. Transit Complaint Form.

B. COMPLAINT REVIEW AND RESPONSE

1. The Grants Administrator will review and investigate all Complaint Reports received.
2. The Grants Administrator will respond to all protests in writing (certified mail), addressing each substantive issue raised in the protest. Response will be made by the Grants Administrator within fifteen calendar days after receiving the complaint. A copy of the response will be forwarded to the Municipal Administrator. The written response will advise the Complainant that she/he has the ability to submit a written request for second review of the matter.

C. SECOND REVIEW

1. In the event the Complainant believes that the situation has not been resolved satisfactorily, she/he may submit a written request for second review of the matter. This written request must be received by the Grants Administrator within fifteen calendar days of the date noted on the Grants Administrator's response letter. The request for second review must be addressed to:

Grants Administrator's Office  
City Administrative Services Building  
304 N. Church Street  
Bowling Green, Ohio 43402

2. Once received, the Grants Administrator will forward the written request to the Municipal Administrator, who will render a written response to the Complainant. The written response will be sent via certified mail to the Complainant within 15 calendar days after being received by the City.
3. The written response will also inform the Complainant that he/she has the right to appeal the secondary review decision. The request for appeal must be in written form, and submitted to the Grants Administration Division within fifteen calendar days of the date noted on the response letter sent by the Municipal Administrator.

D. APPEALS PROCESS

1. Within five working days after receiving the written request for appeal, the Mayor (or designee) will appoint an ad hoc committee of no less than two members to serve as an appeal review body;
2. The request for Appeals hearing must be sent to:

Grants Administrator's Office  
City Administrative Services Building  
304 North Church Street  
Bowling Green, Ohio 43402

4. Notification date of hearing must be mailed (certified mail) to complainant within 10 working days of date of receipt of request for an appeal hearing.
- E. If the complainant is dissatisfied with the City's final resolution of the complaint, he/she has the right to file a complaint with the Ohio Department of Transportation, Office of Transit. The written complaint may be sent to the following address:

Ohio Department of Transportation, at ODOT Office of Equal Opportunity, Attention: Title VI Coordinator, 1980 West Broad St., Columbus, OH 43223.

- F. If the complainant is dissatisfied with the Ohio Department of Transportation's resolution of the complaint, he/she has the right to file a complaint with the:

Federal Transit Administration, at FTA Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Avenue SE, Washington, DC 20590.

RESPONSIBILITIES:

Responsibilities defined above.

**TITLE VI COMPLAINT FORM**



You may fax this form to (419) 353-4763. You may also hand deliver it or mail it to:  
 City of Bowling Green  
 Grants Administration Office  
 304 N. Church St., Bowling Green, OH 43402

**Title VI Complaint Form**

|  |             |  |                          |    |
|--|-------------|--|--------------------------|----|
| <b>Section I:</b>  |             |  |                          |    |
| <b>Name:</b>   |             |  |                          |    |
| <b>Address:</b>  |             |  |                          |    |
| <b>Telephone (Home):</b>   |             |  | <b>Telephone (Work):</b> |    |
| Email Address:   |             |  |                          |    |
| Accessible Format Requirements?  | Large Print |  | Audio Tape               |    |
|  | TDD         |  | 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:<br>_____  |             |  |                          |    |
| 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 |             |  |                          |    |



| <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<br>If yes, check all that apply:<br><input type="checkbox"/> Federal Agency: _____<br><input type="checkbox"/> Federal Court _____ <input type="checkbox"/> State Agency _____<br><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.

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Signature

Date

Please submit this form in person at the address below, or mail this form to:

Tina Bradley, Title VI Coordinator  
304 N. Church Street  
Bowling Green, OH 43402

**LIST OF TRANSIT-RELATED TITLE VI  
INVESTIGATIONS, COMPLAINTS AND LAWSUITS**

**CITY OF BOWLING GREEN/B.G. TRANSIT**

**List of Active Complaints, Inquiries or Lawsuits Alleging Discrimination**

B.G. Transit maintains a list of active investigations conducted by FTA and entities other than FTA, including lawsuits and complaints naming B.G. Transit that allege discrimination on the basis of race, color or national origin. This list includes the date that the transit-related Title VI investigation, lawsuit or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit or complaint.

As of the writing of this program, there are no complaints pending which allege discrimination on the grounds of race, color, national origin or any other form of discrimination.

| <b>Type</b>           | <b>Date<br/>(Month, Day,<br/>Year)</b> | <b>Summary<br/>(include basis<br/>of complaint:<br/>race, color, or<br/>national<br/>origin)</b> | <b>Status</b> | <b>Action(s)<br/>Taken</b> |
|-----------------------|--|--|---------------|----------------------------|
| <b>Investigations</b> | NONE                                   |  |               |                            |
| 1.                    |  |  |               |                            |
| 2.                    |  |  |               |                            |
| <b>Lawsuits</b>       | NONE                                   |  |               |                            |
| 1.                    |  |  |               |                            |
| 2.                    |  |  |               |                            |
| <b>Complaints</b>     | NONE                                   |  |               |                            |
| 1.                    |  |  |               |                            |
| 2.                    |  |  |               |                            |

# **PUBLIC PARTICIPATION PLAN**

# Public Participation Plan for B.G. Transit



**Originally Adopted:** February 4, 2013

**Most Recent Revision/Adoption:** August 31, 2018

## **INTRODUCTION**

The B.G. Transit is a demand-response, origin-to-destination public transportation system operating within the corporation limits of Bowling Green, Ohio. Passengers are encouraged to schedule rides at least one hour in advance of when service is needed. Where capacity allows, the one-hour notice is waived, and the ride is provided. Service is financed, in part, through funding provided by the City of Bowling Green, Community Development Block Grant dollars as well as from state and federal funds provided through the Ohio Department of Transportation and the Federal Transit Administration. Transit fare and ID card 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 City of Bowling Green will undertake outreach methods to engage persons from diverse backgrounds, those with low-moderate incomes and populations with limited English proficiency (LEP) skills as well as a summary of outreach efforts made since the last Title VI Program submission.

## **PURPOSE AND OBJECTIVES**

Pursuant to the revised Title VI, 4702.1B Circular, this Public Participation Plan is hereby adopted to ensure that the public, 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 B.G. Transit activities.

B.G. Transit's Public Participation Plan has been prepared to ensure that no one is precluded from participating in B.G. Transit's service planning and development process. It ensures that:

- Potentially affected community members will have an appropriate opportunity to participate in decisions about a proposed activity that will affect their environment and/or health;
- The public's contribution can and will influence B.G. Transit's decision-making process; and,
- B.G. Transit will seek out and facilitate the involvement of those potentially affected.

Through an open public process, B.G. Transit has developed a public participation plan to encourage and guide public involvement efforts and enhance access to B.G. Transit's transportation decision-making process by minority and Limited English Proficient (LEP) populations. The Public Participation Plan describes the overall goals, guiding principles, and outreach methods that B.G. Transit uses to reach its riders.

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. It includes people who have reported to the U.S. Census that they speak English less than very well, not well, or not at all.

B.G. Transit's Public Participation Plan is based on the following principles:

- Flexibility-The engagement process will accommodate participation in a variety of ways and be adjusted as needed.
- Inclusiveness-B.G. Transit will proactively reach out to and engage low-income, minority and LEP populations from the B.G. Transit service area.
- Respect-All feedback will be given careful and respectful consideration.
- Proactive and Timeliness-Participation methods will have a clear purpose and use for the input, and will be described in language that is easy to understand.
- Clear, Focused and Understandable-Participation methods will have a clear purpose and use for the input, and will be described in language that is easy to understand.
- Honest and Transparent-Information provided will be accurate, trustworthy and complete.
- Responsiveness-B.G. Transit will respond and incorporate public comments into transportation decisions.
- Accessibility-Meetings will be held in locations which are fully accessible and welcoming to all area residents, including but not limited to low-income and minority members of the public and in locations relevant to the topics being presented and discussed.

B.G. Transit will also use its Public Participation Plan while adhering to its adopted *Public Participation Procedure for Service Changes* when considering all major changes. "Major changes" is defined as:

- A fare increase/decrease or significant change in the method of fare payment is being considered.
- Any change in the advance reservation policy (increase or reduction) is proposed.
- Area of service changes are being considered including the addition and/or elimination of service areas.
- Any change related to days and/or hours of service is being contemplated.
- Any change to the *type* of service being offered.

## **ENCOURAGEMENT OF PUBLIC PARTICIPATION**

The community is encouraged to participate in all aspects related to the planning and implementation of the B.G. Transit; including the development of grant applications, procedures, policies, strategic planning, public hearings, public meetings, and operational assessment processes.

The City especially encourages participation from its residents with low- and moderate-incomes, minority, non- and limited-English proficient speaking residents as well as persons with disabilities residing in Bowling Green.

The City 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, the City 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 B.G. Transit's Transit Advisory Committee.

B.G. Transit's Public Participation Plan includes many new mediums extending beyond the traditional approach which relied on legal notices and intermittent media coverage. While B.G. Transit maintains these elements to its outreach program along with traditional seat-drop flyers B.G. Transit has availed itself of the communication methods more widely used by members of our community and riders.

#### **LIMITED-ENGLISH PROFICIENT (LEP) GOALS OF THE PUBLIC PARTICIPATION PLAN**

The overarching goals of B.G. Transit's Public Participation Plan include:

- Clarity in Potential for Influence – The process clearly identifies and communicates where and how participants can have influence and direct impact on decision-making.
- Consistent Commitment – B.G. Transit communicates regularly, develops trust with riders and our community and builds community capacity to provide public input.
- Diversity – Participants represent a range of socioeconomic, ethnic and cultural perspectives, with representative participants including residents from low-income neighborhoods, ethnic communities and residents with Limited English Proficiency.
- Accessibility-Every reasonable effort is made to ensure that opportunities to participate are physically, geographically, temporally, linguistically, and culturally accessible.
- Relevance-Issues are framed in such a way that the significance and potential effect is understood by participants.
- Participant Satisfaction-People who take the time to participate feel it is worth the effort to join the discussion and provide feedback.
- Partnerships-B.G. Transit develops and maintains partnerships with communities through the methods described in its Public Participation Plan.
- Quality Input and Participation-That comments received by B.G. Transit are useful, relevant and constructive, contributing to better plans, projects, strategies and decisions.

Annually, the City of Bowling Green conducts a Limited English Proficiency Four-Factor Analysis for the B.G. Transit. Utilizing the results of said Analysis, the City Grants Administrator will draft a B.G. Transit Limited English Proficiency Plan which will be presented

to the members of the Transit Advisory Committee (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.

Based on figures from the 2010 Census and the most recent U.S. Census Bureau American Community Survey Estimates, the City does not have high concentrations of non-English speaking persons. The City 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 the City using ODOT grant funds and will not be passed along to those persons being assisted. Added specifics are found in the most recent edition of the B.G. Transit Limited English Proficiency Plan.

## **PUBLIC HEARINGS**

Public hearings will be held to obtain the public's views and to respond to proposals, major service changes and questions. Annually, at least one public hearing is held prior to the grant application being submitted to ODOT. Said hearing is to be held before the proposed application is published for comment.

All public hearings will be held in an accessible location (generally the City Administrative Services Building). All public hearings will be advertised in the local newspaper of circulation (The *Sentinel-Tribune*) 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 (the B.G. Transit) is in operation, making the hearing more accessible to persons who might be potential or actual beneficiaries.

As already noted, the City does not have high concentrations of non-English speaking persons. The City 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 the City using ODOT funds and will not be passed along to those persons being assisted.

## **MEETINGS**

The Public is encouraged to attend any scheduled meetings (including Transit Advisory Committee meetings and affiliated sub-committee meetings). Notices will be placed at least 7 calendar days in advance of said meetings on various bulletin boards throughout the City Administration Building located at 304 North Church Street in Bowling Green, Ohio. A “brief” will also be submitted to the *Sentinel-Tribune* for publication at least 7 calendar days prior to the meeting. Both the notices and briefs will state the date, time and place of the meeting.

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

## **CITY COUNCIL MEETINGS**

The Transit Advisory Committee (TAC) advises on matters related to the operations of the B.G. Transit and affiliated grant implementation, to include the approval of policies and procedures for the system. The Bowling Green City Council is the governing body for the B.G. Transit. In an effort to ensure information from TAC meetings is communicated adequately to the City Council, at least one City Council member will be assigned to serve as a member of the TAC annually. Through City Council legislation, the Mayor of Bowling Green is authorized as the approval authority for various prescribed aspects of the B.G. Transit.

City Council generally meets on the 1st and 3rd Monday of each month at 7:00 pm in the Council Chamber, 304 North Church Street, a fully-accessible location. When there is a Monday holiday (Martin Luther King Day, Presidents Day, Memorial Day, Labor Day), the meeting is usually scheduled for the next Tuesday. The Council Schedule is published and available online (<https://www.bgoio.org/departments/elected-officials/city-council-2/>). Notice of these meetings is also posted in the local paper.

All legislation (including that related to the implementation of the 5311 Rural Transportation Grant) is given three readings prior to adoption in an effort to allow for adequate potential for public comment. City Council meetings are also televised on the local public access channel, which allows the public broader access to information and issues being presented.

## **SELECTION OF MEETING AND PUBLIC HEARING LOCATIONS**

When determining locations and schedules for public meetings and hearing locations and schedules, B.G. Transit will:

- Schedule meetings at times and locations that are convenient and accessible for minority and LEP communities;
- Employ various types of meeting formats;
- Coordinate with community organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities;
- Consider radio, television or newspaper ads as other forms of social media that serve LEP populations.
- Provide opportunities for added means of public participation (forums, face-to-face interviews, online surveys, etc.)

## **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 the B.G. Transit is in operation. The B.G. Transit 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.

## **MEDIUMS UTILIZED TO PROMOTE PUBLIC PARTICIPATION**

B.G. Transit will utilize a variety of mediums to reach the public and ensure greater participation. The list below includes some of the mechanisms that may be used:

- Print – newspapers, newsletters, press releases, written articles provided for local publications, etc.
- Website-The City of Bowling Green’s main web page is utilized to make announcements related to the B.G. Transit. Within that website is a comprehensive webpage dedicated totally to B.G. Transit.
- Social Media-The City of Bowling Green will promote B.G. Transit through Twitter, Facebook and other forms of social media.
- Onboard Quarterly Newsletters-Informational news is disseminated onboard the B.G. Transit vans.
- Radio-Press releases are provided on a regular basis to the local radio station. This source also is used for formal advertisements and dedicated interview spots highlighting the B.G. Transit.
- Direct Mail to Community Partners.
- Public Information Sessions (e.g. City Council meetings where transit-related legislation is sought).
- Public Hearings.
- Legal Notices.

## **PUBLIC COMMENTARY**

The City will provide the public with a reasonable opportunity (generally, at least 30 days is mandated) to publicly review and comment on grant applications and any other documents or plans requiring specified public review and comment periods. The City of Bowling Green will give full consideration and response to the public's concerns, comments, and recommendations. Where applicable, review will be advertised in the local newspaper, the *Sentinel-Tribune*, 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 public review, upon request, in the Grants Department, located in the City Administration Building at 304 North Church Street, Bowling Green, Ohio during normal City of Bowling Green business hours.

Persons providing commentary at public hearings must adhere to the following procedures:

- Those attending are to refrain from making commentary on information presented until the public comment portion of the hearing is announced;
- Those making public comment must state their name and address for the record;
- Those making public comment are limited to 5 minutes.

## **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, City 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.

The City has adopted and included in its B.G. Transit Policies and Procedures manual a policy outlining the methods for members of the public to make complaints/comments, including those related to Title VI and ADA matters.

The City will provide a timely and substantial written response within 15 calendar days to any complaints received regarding the operation or implementation of the B.G. Transit or any aspect related to it. Said policy contains provisions which allow for second review of the matter as well as an appeals process.

## **THE INCORPORATION OF PUBLIC COMMENTS INTO DECISIONS**

All comments received through the Public Participation Plan are given careful, thoughtful consideration. Because there are a number of different ways the public can comment on the

proposed service or fare changes (mail, email, public meetings, etc.) all comments are assembled into a single document for presentation to the Mayor for consideration.

## **AVAILABILITY TO THE PUBLIC/ACCESS TO RECORDS**

All public records, documents, reports, etc. related to the B.G. Transit 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 the Grants Department, located at the City Administration Building, 304 North Church Street, Bowling Green, Ohio during normal City of Bowling Green business hours on Monday through Friday from 8:00 a.m. until 4:30 p.m. (except during City holidays). Hard copies will be available for purchase at the current per-page rate as established by the Finance Department. Records will be retained in accordance with applicable Public Record Retention laws, but in no case for a period less than three years.

## **IDENTIFICATION OF STAKEHOLDERS**

Stakeholders are those who are either directly or indirectly affected by a plan, or the recommendations of the Plan. Those who may be adversely affected or who may be denied benefits of a plan's recommendations(s) are of particular interest in the identification of specific stakeholders. Stakeholders can come from a number of groups including general citizens/residents, minority and low-income persons, public agencies, and private organizations and businesses. While stakeholders may vary based on the plan or program being considered, B.G. Transit has assembled a listing of stakeholders with whom we regularly communicate through email and direct mail. Our B.G. Transit Advisory Committee has consumer, Bowling Green State University representation (campus transit and Office of Multicultural Affairs), Wood County Committee on Aging, Wood Lane Board of Developmental Disabilities, Wood County Hospital, and Wood County Jobs and Family Services representation. These persons represent a broad spectrum of the community, but most specifically, those who most might be affected by decisions made regarding the B.G. Transit. As a result, this body comprises our stakeholder list. A complete list of the B.G. Transit stakeholder list may be obtained by contacting the City of Bowling Green's Grants Administration Office at 419-354-6203 or [bggrants @bgoohio.org](mailto:bggrants@bgoohio.org).

## **ACCESS TO INFORMATION**

Various policies and procedures promoting greater public access to information have been adopted by Bowling Green City Council and are included in the B.G. 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—to include fare rates.

The public is encouraged to participate in the process of making service changes. The City of Bowling Green 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 Bowling Green. The City also encourages local government, social service, business and community service agencies to participate in the process of making service changes.

## **SUMMARY OF OUTREACH EFFORTS**

The City's outreach efforts made since the last Title VI Program's submission to the Ohio Department of Transportation are summarized below and include:

- Publishing Title VI Notice to the Public (within public areas of the City's Administrative Services Building and the B.G. Transit web page);
- Provided public notice of all public hearings and meetings related to the B.G. Transit as indicated within this Plan;
- Coordinated and communicated with our stakeholders to include transit consumers, representatives of Bowling Green State University (includes Office of Multicultural Affairs), Wood County Hospital, Wood Lane Board of Developmental Disabilities, Wood County Committee on Aging and Wood County Hospital as members of the B.G. Transit Transportation Advisory Committee in an effort to reach out to populations they serve, meet said populations' needs and develop strategies to ensure maximum public participation.
- Implemented Customer Satisfaction Survey of new B.G. Transit passengers (January through March 2018).
- Sustained policy first implemented in 2014 to enable LEP passengers to bring interpreter onboard B.G. Transit free of cost (just like personal care attendants)
- Conducted annual review of the Complaint Procedures to include specific instruction on how to file a Title VI discrimination complaint. The policy was amended to incorporate a new complaint form for Title VI complaints (August 2018);
- All public hearings and Transportation Advisory Committee meetings are/were held at the City of Bowling Green Administrative Services Building, 304 N. Church Street, Bowling Green, OH 43402 (a fully-accessible location).
- All public hearings and Transportation Advisory Committee meetings are/were held on days/times when the B.G. Transit (fully accessible to persons with disabilities) is in operation.
- Conducted review of the Complaint form to include the ability to provide the public to make specific Title VI complaints;
- Conducted annual Limited English Proficiency Four-Factor Analysis;
- Developed and adopted an updated Limited English Proficiency Plan (May 2018) which aligns with the most recent Limited English Proficiency Four-Factor Analysis (May 2018);
- Conducted review and amendments of Public Participation Plan for use with B.G. Transit.
- Developed and adopted a *Reasonable Modification Policy* and an *Americans with Disabilities Act of 1990 (ADA) Policy and Demand Response Service Policy* (August 2018);
- Beginning January 1, 2018, a fare increase was implemented for all rides that begin and originate within Bowling Green's corporation limits. This fare was approved by the Ohio

Department of Transportation (ODOT) following the City's adherence to *B.G. Transit's Public Participation Procedure for Service Changes* and in accordance with the B.G. Transit's Public Participation Plan.

The aforementioned changes, the associated outreach, and all forms of approval (including that by ODOT and the Bowling Green City Council) are available by contacting the City of Bowling Green Grants Administration Office at 419-354-6203 or [bggrants@bgohio.org](mailto:bggrants@bgohio.org).

- Service Provider Compliance: The City of Bowling Green contracts its service provision through Black and White Transportation, LLC. In accordance with the contract, various forms of monitoring occur throughout the year to include onsite inspection of records, monthly reporting and contractor presence at quarterly Transit Advisory Committee meetings.
- Equity Analysis for Facility: The City of Bowling Green does not have any federally-funded facilities related to the B.G. Transit.
- Demographic Service Profile: Because B.G. Transit operates only seven vans (five in peak service), a demographic service profile was not prepared for this update.
- Pending Applications for Financial Assistance: The City of Bowling Green will submit (no later than October 12, 2018) a 5311 Rural Public Transit grant application for financial assistance to ODOT for 2019.
- Civil Rights Compliance Reviews in the Past 3 Years: B.G. Transit has not been the subject of any such reviews to date.
- Recent Annual Certifications and Assurances: The City of Bowling Green (on behalf of B.G. Transit) executed its most recent Certifications and Assurances to the FTA (September 2018). Last year's were signed in August 2017.

# **LANGUAGE ASSISTANCE PLAN**

# B.G. TRANSIT



## LIMITED ENGLISH PROFICIENCY PLAN

**Originally Adopted:**

August 19, 2008

**Most Recent Revision/Adoption:**

May 15, 2018

**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 City of Bowling Green’s Transit Advisory Committee (TAC) has adopted this plan to provide meaningful access to the B.G. Transit for persons with LEP wishing to participate in the City’s HUD-funded programming.

**MEANINGFUL ACCESS—THE FOUR-FACTOR ANALYSIS:**

The City of Bowling Green will annually assess and update the LEP Four-Factor Analysis for use by the B.G. Transit. 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 B.G. Transit.
- The frequency with which persons with LEP come into contact with the B.G. Transit.
- The nature and importance of the B.G. Transit to persons with LEP.
- The City of Bowling Green’s (B.G. Transit’s) Resources and Anticipated Costs for providing meaningful access to persons with LEP.

Prior to the development of this LEP Plan, a Four-Factor Analysis was conducted by the City of Bowling Green Grants Administrator. Various forms of federal, state and local LEP-related data were analyzed. The Analysis provided the City of Bowling Green with a more comprehensive understanding of how many people with LEP are likely to be encountered and how often those persons have accessed the B.G. Transit in the past year. The Analysis served as the basis for this LEP Plan.

**THE IDENTIFICATION OF LEP INDIVIDUALS WHO NEED LANGUAGE ASSISTANCE:**

1. Analysis of Census Data: Data from the U.S. Census Bureau’s 2010 Decennial Census indicates that Bowling Green’s total population is 30,028. American Community Survey 5-Year Estimates (2012-2016) indicate a current population of 31,641. A slight upward trend in population has been evidenced since the 2010 Census.

The following data is courtesy of the U.S. Census Bureau's 2012-2016 American Community Survey 5-Year Estimates: Amongst the total population, it is estimated that the native population (age 5 and older) is 30,389 and 92.6 percent (92.6%) speak "only English at home." " Of the City's estimated 30,389 residents (age 5 and older), 1,594 (1.3%) of these persons is foreign born, 465 being naturalized and 1,129 not being U.S. citizens. Amongst persons that are foreign born, it is estimated 1.3% speak "only English at home."

Regarding American Community Survey data (2012-2016) pertaining to "Language Spoken at Home," an estimated 30,389 persons in Bowling Green are 5 years of age or older. Amongst that number of people 92.6 percent are believed to speak English only. Only 2.4 percent of these persons are estimated to speak English less than "very well." Of those persons who speak English less than "very well," it is guesstimated the makeup to be as follows:

Spanish speak English less than very well: 196 (0.7%)

Indo-European languages speak English less than very well: 97 (0.3%)

Asian and Pacific Islander languages speak English less than very well: 214 (0.7%)

Other languages speak English less than very well: 229 (0.8%).

The City also analyzed data from the Ohio Department of Education's 2016-2017 School Year Report Card. Migrant student data was not available for the Bowling Green City School District as the number affected was below the minimum standard needed for statistical reliability. The District's limited English proficient population was noted as being 1.9%. At every grade level, students attending Bowling Green Schools displayed reading competency skills above the State's averages. On an added note, the District's migrant population was noted as too small to calculate.

2. Information gathered from community organizations that serve persons with LEP: Close to 25 local agencies, thought likely to serve persons with LEP, were also surveyed by the City of Bowling Green (February 2018). Only a small percentage of those agencies responded. For the most part, the results received closely align with other data analyzed by the City. LEP contacts are relatively few and, when present, are predominantly with persons who speak Spanish.

On May 29, 2014, the Grants Administrator received a call from staff at the Cocoon Shelter (local shelter for battered/abused persons). This individual indicated that they had been serving more individuals who did not speak fluent English. Their question was whether an interpreter could accompany a passenger with LEP—free of charge. After

confirming this was permissible (through Justin Steele of ODOT), staff at the Cocoon Shelter was advised accordingly. Thereafter (August 19, 2014), the Transit Advisory Committee formalized this through revision of B.G. Transit policies.

3. Information gathered from staff who have or might come into contact with persons with LEP: In March 2018, an interview was conducted with Scott Potter, Co-owner and Operations Manager for the B.G. Transit. The purpose of this dialogue was to determine the number of LEP encounters that took place in the past year. Potter indicated there were no new LEP encounters within the last year. One long-time passenger with somewhat limited English proficiency skills continues to utilize the transit on a regular basis. To date, B.G. Transit has been able to successfully meet this individual's needs—despite the passenger's limited English proficiency skills. One added passenger (within the last couple of years) hails from Russia; however, the individual speaks English fluently, and is not considered to be a passenger with LEP.

The City of Bowling Green's Grants Administration personnel provide the public service information about the transit system (face-to-face, over the phone and via email inquiries), receive and investigate consumer complaints as well as answer patrons' service-related questions. City employees also issue transit ID cards to eligible passengers. City employees working in the Grants Administration Division did not encounter anyone with limited English proficiency skills within the last year.

4. 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 B.G. Transit 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. B.G. Transit staff will verbally communicate any LEP encounters they might have with the General Manager (drivers) or Operator (call takers), as appropriate. "I speak" cards (*see Appendix A of this Plan*) will be available onboard all of the B.G. Transit vehicles and available to City of Bowling Green staff at the City Administration Building as a means of identifying the languages encountered. 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 inquired about how to schedule a ride). It will be the responsibility of the Grants Administrator to record/track these contacts and review them annually in the process of evaluating the current LEP Plan. Recording the same information as noted above, the City of Bowling Green staff will also document contacts with LEP persons and provide them to the Grants Administrator, who will analyze them, annually, as the plan is reviewed.
5. Synopsis of How Many Persons Need Language Assistance: As noted above, no full-fledged LEP encounters have occurred to date. Currently, only one passenger with

somewhat limited English proficiency skills utilizes the B.G. Transit. The passenger has navigated the system, without issue, for several years now. Federal, state and local data indicate that the actual number of persons with LEP who live in Bowling Green 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, Spanish is the language most likely to be encountered in the event of such instances.

## LANGUAGE ASSISTANCE MEASURES:

The City of Bowling Green currently has staff that can provide some level of free interpretation or translation of printed materials for persons who speak Spanish and need language assistance. In the event this is not sufficient, attempts will be made to secure a volunteer who speaks Spanish (possibly via Bowling Green State University's Office of Multicultural Affairs). If there are no volunteers available, the City can secure reasonably-priced services (if needed) through La Conexion or PathStone for the purpose of Spanish interpretation. Although actual delivery is not guaranteed for languages other than Spanish, the City of Bowling Green will make reasonable efforts to arrange for free language assistance for any consumer—regardless of the language spoken.

1. Language assistance measures already implemented: To date, the B.G. Transit (and the City of Bowling Green) have not had any official requests for assistance with oral or written language interpretation/translation.
2. Procedures for obtaining oral/written language interpretation: The Four-Factor Analysis clearly indicates that Spanish is the language most likely to be encountered if language assistance is needed. The City of Bowling Green currently has one staff person with a minimal degree of Spanish language proficiency. As a result, bilingual staff members will first attempt to assist those persons requesting or needing assistance. If this is not sufficient, a volunteer interpreter will be sought as noted above. Should none be available, La Conexion and PathStone provide Spanish language interpretation at reasonable costs (Grants Administrator or Municipal Administrator must approve this expense in advance). For persons needing interpretation for a language other than Spanish, staff should seek a volunteer interpreter through Bowling Green State University's Office of Multicultural Affairs (*see Exhibit B for Language Assistance Resource List*) Staff persons have been made aware of this process for the purpose of knowing how to access language assistance in the future.
2. Instructions for staff on how to respond to callers with LEP: The City of Bowling Green has at least one staff person with some degree of **Spanish language** proficiency. The other employees have been made aware of this, and know to utilize these persons' skills in the event language assistance is needed.

All new (unduplicated) LEP contacts must be documented for the next year's LEP Four-Factor Analysis. The B.G. Transit Operations Manager (or designee) will provide new contact information (date of encounter, type of assistance requested and language spoken) to the City of Bowling Green Grants Administrator as encounters take place. City of Bowling Green staff will also provide this information to the Grants Administrator as encounters take place.

In the event **a language other than Spanish** is encountered, the Grants Administrator must be notified so that a volunteer interpreter can be sought. The B.G. Transit Operations Manager (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 Grants Administrator will make every reasonable effort to secure a volunteer interpreter working through Bowling Green State University's Office of Multicultural Affairs. Language assistance for languages other than Spanish is not guaranteed. The City of Bowling Green, 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 Grants Administrator must be notified as soon as possible. Thereafter, the Grants Administrator 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 Grants Administrator's responsibility to record these encounters at the time they occur for inclusion in the coming years' Four-Factor Analysis. If necessary, translation services may be secured through a local provider.

In the event that correspondence is received in a **language other than Spanish**, the Grants Administrator must be notified as soon as possible. Thereafter, the Grants Administrator will attempt to locate a volunteer who can translate the correspondence and assist in providing a written response. It will be the Grants Administrator's responsibility to record these encounters at the time they occur for inclusion in the coming years' Four-Factor Analysis.

4. Instructions for drivers and call takers 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 access, “I speak” cards will be kept in the transit vehicles as well. Drivers who encounter persons with weak or no English speaking skills should utilize the “I speak” cards to identify what type of language assistance is needed.

If a driver encounters a person with LEP who needs language assistance, she/he should contact the Operations Manager (or designee). In the event **Spanish** language assistance is needed, the Operations Manager will relay the date of the encounter and type of assistance provided to the Grants Administrator 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 General Manager who will contact the Operations Manager. The Operations Manager will thereafter notify the Grants Administrator, who will attempt to secure a volunteer 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 Grants Administrator 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.

Interpreters accompanying LEP passengers may ride the B.G. Transit free of cost; much like a personal care attendant does.

5. Instructions for City of Bowling Green staff on how to respond to persons with LEP: Staff that serve persons with weak English skills should first utilize the “I speak” cards 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 Grants Administrator 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 Grants Administrator must be notified. Thereafter, the Grants Administrator will attempt to secure a volunteer 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 Grants Administrator 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, City staff with some competency will first be utilized. In the event these resources are not immediately available or cannot successfully interpret, the Grants Administrator will utilize a volunteer from the Bowling Green State University's Office of Multicultural Affairs, PathStone in Liberty Center, Ohio or La Conexion de Wood County in Bowling Green.

In instances where a assistance is needed for a **language other than Spanish**, a volunteer will be sought from the Bowling Green State University Office of Multicultural Affairs. The City of Bowling Green reserves the right to have the interpreter/translator demonstrate her or his ability to communicate and/or translate information in both English and the other language. The City of Bowling Green will provide direct assistance to the interpreter or translator so that person has insight regarding system operations, policies, activities, etc. The City of Bowling Green 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 City of Bowling Green 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 the B.G. Transit. "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 client with LEP.
- 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.

The City of Bowling Green maintains relationships with other organizations that assist specific cultural and ethnic groups living in Bowling Green. To help their clients obtain public transportation, the B.G. Transit organizations may provide qualified interpreters for persons with LEP.

#### **LEP PLAN APPROVAL:**

1. The LEP Plan will be approved by the B.G. Transit's TAC.

2. The LEP Plan shall be reviewed and updated no less than annually by the B.G. Transit TAC.
3. The approval LEP Plan will contain the approval date of the original plan as well as the date of the most recently-adopted version.

**LEP PLAN DISTRIBUTION AND TRAINING:**

1. Staff likely to come into contact with persons with LEP: The scenarios contained in the table below are not all inclusive. However, they are anticipated to be most representative of when likely LEP encounters might occur as well as the expected point of contact.

**Staff Most Likely to Have an LEP Encounter**

| Staff   | Anticipated Point of Contact  |
|---|---|
| B.G. Transit Call Taker                               | When a person calls to schedule a trip  |
| B.G. Transit Driver                                   | During a trip (if the passenger has questions/concerns about system operations or the service provided) |
| City of Bowling Green Grants Administration personnel | When a passenger seeks information about the transit system   |
| City of Bowling Green Grants Administration personnel | At the time an individual wishes to make a complaint  |
| City of Bowling Green Grants Administration personnel | When a person secures a transit ID card   |
| City of Bowling Green Grants Administration personnel | 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 B.G. Transit staff and the City of Bowling Green Grants Administration staff.

- Available for public review (during normal business days/hours) at the Grants Administration Office, 304 N. Church St., Bowling Green, OH.
- Explained in orientation and training sessions for the City of Bowling Green Grants Administration staff
- Made available to City of Bowling Green Grants Administration staff as revisions/updates to the LEP Plan occur.

**PROVIDING NOTICE TO LEP PERSONS:**

Public hearing notices currently include the following statement. “Those individuals who are non-English speaking and require an interpreter should contact the City of Bowling Green Grants office at least 48 hours prior to the public hearing. Upon timely request, these services will be provided free of cost.” This form of notice will continue to be provided.

**MONITORING:**

The City of Bowling Green Grants Administrator will utilize the TAC to review the plan annually—sometime prior to the 5311 operating grant submission. The review will include:

1. An annual report indicating the number of clients or potential clients with LEP encountered during the one-year period. The report should include the number and types of requests received, the various languages encountered, costs, etc. *This report may be made a part of the annual LEP Four-Factor Analysis and be in narrative form.*
2. A yearly review of the Four-Factor Analysis to ensure that the data, frequency with which persons with LEP come into contact with the programs, nature of any encounters and resources/costs are still accurately reflected/projected for the coming year.
3. The City of Bowling Green will consultations with other entities serving the public and at-risk persons, no less than every five years. Consultations will be conducted with community organizations representing LEP persons as well as the staff responsible for providing language assistance.
4. The City of Bowling Green will consider making changes to the LEP Plan based upon the introduction of new, compelling data or documented increased frequencies in contacts. Associated costs and resources available to implement changes will be taken into consideration. Depending upon the evaluation, the City may choose to expand the language measures that are particularly effective or modify or eliminate those which have not been effective.

**TABLE DEPICTING MINORITY REPRESENTATION**  
**ON COMMITTEES AND COUNCILS**

## **DECISION-MAKING BODIES**

Elected Officials-Through adopted legislation, Bowling Green's City Council authorizes the Mayor to approve all applications, plans, proposals, reports, and other manner of B.G. Transit operations to include the Title VI Program. This includes the decision to approve or deny the Transit Advisory Committee's proposed transit-related service changes recommendations. Once the approved Public Participation Procedure for Service Changes related to the B.G. Transit has been conducted in conjunction with the B.G. Transit Public Participation Plan and the Ohio Department of Transportation renders its final concurrence, the City Council will approve any policies affected by the service change (to include a change in fare rates, areas of operation, advance, reservation and days/times of operation).

Transit Advisory Committee (TAC)-The Transit Advisory Committee (TAC) is comprised of appointed, non-elected members and meets no less than quarterly each calendar year at a time and place established by the City of Bowling Green. Appointments are recommended by the Mayor and approved by City Council. The TAC advises on matters related to the operations of the B.G. Transit and affiliated grant implementation, to include the approval of policies and procedures for the system. Additional meetings may be established for good cause by the City of Bowling Green.

Vehicle Accident Prevention Sub-Committee-The Vehicle Accident Prevention Sub-Committee is comprised of appointed, non-elected members and shall meet at least 4 times each calendar year at a time and place immediately following the regularly-scheduled TAC meeting. The Vehicle Accident Prevention Sub-Committee is made of up current members of the TAC. This body advises on matters related to accident prevention. Additional meetings may be established for good cause by the City of Bowling Green.

Efforts made to encourage the participation of minorities on such committees are listed in the Public Participation Plan for the B.G. Transit which is also posted on the City's web page (*Title VI Program link*) at <https://www.bgohio.org/departments/municipal-administrator/grants-administration/public-transportation/>. Minority representation on both the Transit Advisory Committee and Vehicle Accident Prevention Sub-committee is noted below. One member of both committees indicated she is white, but has Hispanic ethnicity.

Citizens are encouraged to participate in all aspects related to the planning and implementation of the B.G. Transit; including the development of grant applications, procedures, policies, strategic planning, public hearings, public meetings, and operational assessment processes. The City especially encourages participation from its residents at low-income levels, minority, non- and limited-English proficient speaking residents as well as persons with disabilities residing in Bowling Green.

The City 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, the City 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 B.G. Transit's Transit Advisory Committee.

**TABLE DEPICTING RACE AND ETHNICITY OF CURRENT  
NON-ELECTED COMMITTEES OF B.G. TRANSIT**

| <b>Body</b>                                      | <b>% White</b> | <b>% Black or African American</b> | <b>% American Indian or Alaska Native</b> | <b>% Asian</b> | <b>% Native Hawaiian or Other Pacific Islander</b> | <b>% Some Other Race</b> | <b>% Two or More Races</b> | <b>Number Indicating Hispanic Ethnicity</b> |
|--|----------------|------------------------------------|---|----------------|--|--------------------------|----------------------------|---|
| <b>Population*</b>                               | <b>87.60%</b>  | <b>6.40%</b>                       | <b>0.20%</b>                              | <b>2.10%</b>   | <b>&lt;0.1%</b>                                    | <b>1.40%</b>             | <b>2.20%</b>               | <b>1,436 (4.80%)</b>                        |
| <b>Transit Advisory Committee</b>                | <b>100%</b>    | <b>0%</b>                          | <b>0%</b>                                 | <b>0%</b>      | <b>0%</b>  | <b>0%</b>                | <b>0%</b>                  | <b>1</b>                                    |
| <b>Vehicle Accident Prevention Sub-Committee</b> | <b>100%</b>    | <b>0%</b>                          | <b>0%</b>                                 | <b>0%</b>      | <b>0%</b>  | <b>0%</b>                | <b>0%</b>                  | <b>1</b>                                    |

\*Geographic area: City of Bowling Green only Source 2010 Census.

## **CONTACT INFORMATION**

For additional information on the B.G. Transit Title VI Plan, or our efforts to comply with the Civil Rights Act of 1964 or Executive Order 13166 Improving Access to Services for Persons with Limited English Proficiency, please contact Tina Bradley, City of Bowling Green Grants Administrator at 419-354-6203 or [bggrants@bgohio.org](mailto:bggrants@bgohio.org).

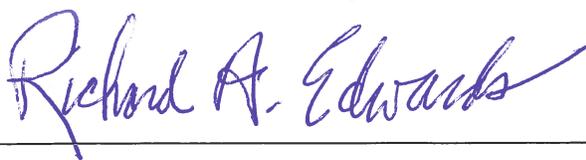
# **APPROVAL OF THE TITLE VI PROGRAM**

# Acknowledgement TITLE VI PROGRAM

The City of Bowling Green (operating as B.G. Transit) Title VI Program, updated 8/31/2018, provides the City with requirements and guidelines necessary to carry out U.S. Department of Transportation Title VI regulations (49 CFR part 21) and to integrate into the City's programs and activities considerations expressed in the Division's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient ("LEP") Persons.

This program has been approved by the following official responsible for policy decisions for B.G. Transit:

Understood and agreed:



Richard A Edwards, Mayor-City of Bowling Green

August 31, 2018

Date

RECORD OF RESOLUTIONS

1st Reading: 6-4-18  
2nd Reading: 6-18-18  
3rd Reading: 7-2-18

BOWLING GREEN (2018-2019) (FORM NO. 602)

Resolution No. 3703 Passed July 2, 2018

**A RESOLUTION AUTHORIZING THE FILING OF (A) PROPOSAL(S) AND/OR (AN) APPLICATION(S) WITH THE OHIO DEPARTMENT OF TRANSPORTATION FOR GRANTS THROUGH THE US DOT FEDERAL TRANSIT ADMINISTRATION (FTA), AS AUTHORIZED UNDER FEDERAL TRANSIT LAWS, AS CODIFIED, 49 USC SECTION 5311, FINANCIAL ASSISTANCE FOR OTHER THAN URBANIZED AREAS AND FUNDS AVAILABLE FROM THE OHIO PUBLIC TRANSPORTATION GRANT PROGRAM, EXECUTING A CONTRACT/GRANT FOR THE FY 2019 OHIO ELDERLY AND DISABLED TRANSIT FARE ASSISTANCE PROGRAM, AND 5339 AND/OR 5311 FUNDING FOR CAPITAL AND/OR OPERATING ASSISTANCE, AND EXECUTING A CONTRACT WITH THE OHIO DEPARTMENT OF TRANSPORTATION UPON GRANT PROPOSAL(S) AND/OR APPLICATION(S) APPROVAL**

WHEREAS, the Director of the Ohio Department of Transportation is authorized to make grants for a public transportation program;

WHEREAS, the contract for financial assistance will impose certain obligations upon the applicant, including the provision by it of the local share of the project costs in the program;

WHEREAS, it is required by the U.S. Department of Transportation in accordance with the provisions of Title VI of the Civil Rights Act of 1964, that in connection with the filing of a proposal and/or application for assistance under 49 USC Section 5311 the applicant give an assurance that it will comply with Title VI of the Civil Rights Act of 1964 and the U.S. Department of Transportation requirements thereunder; and

WHEREAS, it is the goal of the applicant that disadvantaged business enterprise be used to the fullest extent possible in connection with this/these project(s), and that definite procedures shall be established and administered to ensure that disadvantaged businesses shall have the maximum construction contracts, supplies, equipment contracts, or consultant and other services.

NOW, THEREFORE, BE IT RESOLVED BY THE BOWLING GREEN CITY COUNCIL:

SECTION 1: That the Mayor of the City of Bowling Green, Ohio is authorized to execute and file (a) proposal(s) and/or (an) application(s) on behalf of the City of Bowling Green, Ohio with the Ohio Department of Transportation to aid in the financing of capital and operating assistance projects pursuant to 49 USC Section 5311 and the Ohio Public Transportation Grant Program.

SECTION 2: That the Mayor of the City of Bowling Green, Ohio is authorized to execute and submit (a) 5311 and/or 5339 application(s) on behalf of the City of Bowling Green, Ohio with the Ohio Department of Transportation to aid in the financing of capital and operating assistance projects and the Ohio Public Transportation Grant Program.

SECTION 3: The Mayor of the City of Bowling Green, Ohio is authorized to execute and file with such proposals and/or applications and assurance or any other document required by the U.S. Department of Transportation effectuating the purposes of Title VI of the Civil Rights Act of 1964.

SECTION 4: That the Mayor of the City of Bowling Green, Ohio is authorized to furnish such additional information as the Ohio Department of Transportation may require in connection with the proposal and/or application for the program of projects submitted to FTA.

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SECTION 5: That the Mayor of the City of Bowling Green, Ohio is authorized to set forth and execute affirmative disadvantaged business policies in connection to any procurement made as part of the project.

SECTION 6: That the Mayor of the City of Bowling Green, Ohio is authorized to execute 5311 and/or, 5339 grant agreement(s) on behalf of the City of Bowling Green, Ohio with the Ohio Department of Transportation for aid in the financing of operating and capital assistance projects.

SECTION 7: That the Mayor of the City of Bowling Green, Ohio is hereby authorized to execute a contract/grant for the FY2019 Ohio Elderly and Disabled Transit Fare Assistance Program and execute and file any assurances or any other documentation required by the Ohio Department of Transportation on behalf of the City of Bowling Green, Ohio.

Passed: July 2, 2018 MLA  
 Date President of Council  
 MICHAEL A. ASPACHER

Attest: Kay D. Scherreik  
 Clerk of Council  
 KAY D. SCHERREIK

Approved: July 3, 2018 Richard A. Edwards  
 Date Mayor  
 RICHARD A. EDWARDS

MICHAEL J. MARSH  
CITY ATTORNEY  
kds

The undersigned duly qualified and acting Mayor of the City of Bowling Green, Ohio of the City of Bowling Green, Ohio certifies that the foregoing is a true and correct copy of a resolution, adopted at a legally convened meeting of the Bowling Green City Council held on July 2, 2018.

Kay D. Scherreik  
Kay D. Scherreik, Clerk of Council

CERTIFICATION  
This is to certify that the foregoing is a true copy of Res. No. 3703 passed by the Council of the City of Bowling Green, Ohio, July 2, 2018.  
Kay D. Scherreik  
Clerk of Council