

**RESOLUTION APPROVING THE ASHTABULA COUNTY TRANSPORTATION SYSTEM (ACTS) TITLE VI PLAN**

WHEREAS, The Board of Ashtabula County Commissioners, on behalf of the Ashtabula County Transportation System (ACTS), 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 they have been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with The Ashtabula County Board of Commissioners; and

WHEREAS, Upon review of the Title VI Plan by the Board of County Commissioners, it is determined that the Plan for Ashtabula County be approved; now

THEREFORE, BE IT RESOLVED, By the Board of Commissioners of Ashtabula County, Ohio, that the Ashtabula County Transportation System (ACTS) Title VI Plan is hereby approved in accordance with the copy of said plan on file.

**ASHTABULA COUNTY COMMISSIONERS  
CERTIFICATION PAGE**

**Resolution No. 2024-206**

**April 16, 2024**

**RESOLUTION APPROVING THE ASHTABULA COUNTY TRANSPORTATION  
SYSTEM (ACTS) TITLE VI PLAN**

**Upon the motion of Casey R. Kozlowski, seconded by J.P. Ducro IV.**

**VOTE:**

**Kathryn L. Whittington**

**Aye**

**J.P. Ducro IV**

**Aye**

**Casey R. Kozlowski**

**Aye**

**CERTIFICATE OF CLERK**

IT IS HEREBY CERTIFIED that the foregoing is a true and correct transcript of a resolution acted upon and duly passed by the Board of County Commissioners of Ashtabula County, Ohio, on the date noted above.



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Lisa Hawkins, Clerk of the Board  
Board of County Commissioners  
Ashtabula County, Ohio

**Ashtabula County Transportation System (ACTS)  
Title VI Program**



**2024**

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## Notifying the Public of Rights Under Title VI

### The Board of Ashtabula County Commissioners

- The Board of Ashtabula County Commissioners on behalf of the Ashtabula County Transportation System (ACTS) 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 Ashtabula County Board of Commissioners.
- For more information on Ashtabula County Transportation System (ACTS) civil rights program, and the procedures to file a complaint, contact 440-576-3750 (TTY 800-750-0750); email [Commissioners@ashtabulacounty.us](mailto:Commissioners@ashtabulacounty.us); or visit our administrative office at 25 W Jefferson St., Jefferson, Ohio 44047. For more information visit [www.ashtabulacounty.us](http://www.ashtabulacounty.us).

- For transportation-related Title VI matters, a complainant may file a complaint directly with the Ohio Department of Transportation, Attn: Office of Opportunity, Diversity, and Inclusion, Title VI Coordinator, 1980 West Broad St., Mailstop 3270, Columbus, OH 43223.
- For transportation-related Title VI matters, a complainant may file a complaint directly with the Federal Transit Administration, Office of Civil Rights, Attention: Complaint Team, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

- If information is needed in another language, contact 440-998-1110 or 1-800-935-0242
- Or the ACTS Operation Center at 440-992-4411 or 1-800-445-4140

FTA states that: agencies shall inform the public of their rights under Title VI through such measures as posting the Title VI notice on posters, comment cards, or flyers placed at stations, bus shelters, and in transit vehicles. The type, timing, and frequency of these measures are at the recipient's discretion, if the type, timing, and frequency are sufficient to notify passengers and other interested persons of their rights under DOT's Title VI regulations. As such, ACTS Title VI Notice to the Public will be posted at the following locations:

- ACTS Operations Center Lobby
- ACTS Operations Center Meeting Room
- ACTS Website
- ACTS Transportation vehicles

## Ashtabula County Transportation System (ACTS) Title VI Program

### Policy Statement

Ashtabula County Transportation System (ACTS) as a recipient of Federal Transit Administration (FTA) grant dollars either directly from FTA or through the Ohio Department of Transportation (ODOT), will comply with the Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the U.S. Department of Transportation implementing regulations, FTA Circular 4702.1B, and ODOT Public Transportation requirements as specified in Master Grant Agreement, and State Management Plan.

### Title VI Complaint Procedure

ACTS Title VI Complaint Procedure is made available in the following locations:

- Agency website at: [Commissioners@ashtabulacounty.us](mailto:Commissioners@ashtabulacounty.us)
- Hard copy at the ACTS Operation Center, 425 W 24<sup>th</sup> St, Ashtabula, Ohio 44004
- Agency Title VI Plan

Any individual, group of individuals or entity that believes they have been discriminated against based on race, color, or national origin by Ashtabula County Transportation System (ACTS) (hereinafter referred to as "the Agency") may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. Any individual having filed a complaint or participated in the investigation of a complaint shall not be subjected to any form of intimidation or retaliation. Individuals who have cause to think that they have been subjected to intimidation or retaliation can file a complaint of retaliation following the same procedure for filing a discrimination complaint. A complaint must be filed with ACTS no later than 180 days after the following:

1. The date of the alleged act of discrimination; or
2. The date when the person (s) became aware of the alleged discrimination; or
3. Where there has been a continuing course of conduct, the date on which that conduct was discontinued of the latest instance of the conduct.

Once the complaint is received, the Agency will review it to determine if our office has jurisdiction. A copy of each Title VI complaint received will be forwarded to the Ohio Department of Transportation within ten (10) calendar days of receipt. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

The Agency has 45 days to investigate the complaint. If more information is needed to resolve the case, the Agency may contact the complainant requesting further information. The complainant has 10 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 10 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.

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## Ashtabula County Transportation System (ACTS) Title VI Program

After the investigator reviews the complaint, the agency 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, it must direct the appeal to the Agency initially. The complainant has 10 days after the date of the closure letter or the LOF to do so. If there is outstanding concern, the appeal may be directed to the state DOT or FTA. The appeal process information will be included in the letter.

Ashtabula County Transportation System (ACTS) Title VI Program

**Title VI Complaint Form**

<b>Section I:</b>				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
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: _____				
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 the next page.				
_____				
_____				
_____				
_____				
_____				
_____				



Name:
Title:
Agency:
Address:
Telephone:
<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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<b>Signature</b>	<b>Date</b>
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If information in needed in another language, contact 440-998-1110 or 1-800-935-0242  
 Or the ACTS Operation Center at 425 W 24<sup>th</sup> St, Ashtabula, Ohio 44004, 440-992-4411

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

EEOC Coordinator  
 25 W Jefferson St.  
 Jefferson, Ohio 44047  
 440-576-3750

[Commissioners@ashtabulacounty.us](mailto:Commissioners@ashtabulacounty.us)

## Ashtabula County Transportation System (ACTS) Title VI Program

ACTS maintains a list or log of all Title VI investigations, complaints, and lawsuits, pertaining to its transit-related activities.

- **There have been no investigations, complaints, and/or lawsuits filed against ACTS since the last plan update.**

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

## Ashtabula County Transportation System (ACTS) Title VI Program

### Public Participation Plan

#### Strategies and Desired Outcomes

To promote inclusive public participation, ACTS will employ the following strategies, as appropriate (make these determinations based on a demographic analysis of the population (s) affected, type of plan, program and/or service under consideration, and the resources available):

- Provide for early, frequent, and continuous engagement by the public
- Select accessible and varied meeting locations and times
- Employ different meeting sizes and formats
- Use social media in addition to other resources to gain public involvement
- Use radio, television, or newspaper ads on stations and in publication that service LEP populations
- Outreach to LEP populations may also include audio programming available on podcasts
- Expand traditional outreach methods by visiting ethnic stores/markets and restaurants, community centers, libraries, faith-based institutions, and local festivals.

In addition to these strategies:

- a. TAC (Transportation Advisory Committee) meetings as well as all public hearings for ACTS are held at locations and times convenient and accessible for minority, low income and LEP riders. Whenever public hearings are held to address important issues such as fare increases or major service reductions, more than one public hearing will be held to allow better access to LEP persons.
- b. TAC meetings and public hearings are advertised in the local newspaper two weeks prior to the meeting as open to the public and held at accessible locations well known to the public. Public hearings are held at the Commissioner's Office, 25 W Jefferson St, Jefferson, Ohio 44047, or a suitable location within Ashtabula City that is located on the deviated fixed route. If there are any public meetings about changes to service, ACTS will make every effort to post the meeting notice at local restaurants, factories, church programs, Rural Opportunities office, as well as at ACJFS in both English and Spanish. ACTS can be flexible to accommodate requests at other times and locations if we are made aware of the need. ACTS will coordinate with community and faith-based organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities.
- c. ACTS will work with ACJFS and other organizations as well as Kent State University and A-Tech to reach out to the LEP population in our community that also includes all minority and low income.

## Ashtabula County Transportation System (ACTS) Title VI Program

- d. We will offer meetings at local establishments that are frequented by non-English speaking customers.
- e. During our marketing campaign, we will address the LEP guidelines to make other organizations aware.

Other outreach efforts to abide by the Public Participation Plan include:

- Issuing public statements in local newspapers regarding public hearing and TAC meetings with addresses and times that are suitable for LEP and low-income populations.
- Providing locations to low income, senior, and disabled housing units for focus groups.
- Posting the Annual Transportation Survey on Ashtabula County's official website for all to access.
- Working with Kent State Student Services and A-Tech to provide information to college students.

## Ashtabula County Transportation System (ACTS) Title VI Program

### Language Assistance Plan

#### Plan Components

As a recipient of federal US DOT funding, ACTS is required to take reasonable steps to ensure meaningful access to our programs and activities by limited-English proficient (LEP) persons.

Limited English Proficient (LEP) refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. This includes those who have reported to the U.S. Census that they speak English less than very well, not well, or not at all.

To determine if an individual is entitled to language assistance and what specific services are appropriate, the ACTS Language Assistance Plan will include the following elements:

- Define LEP Demography
- Contact frequency
- Importance of Service
- Resources and Costs

- (1) **The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.** In addition to the number or proportion of LEP persons served, ACTS will identify:
  - (a) How LEP persons interact with the recipient's agency;
  - (b) LEP communities and assess the number or proportion of LEP persons from each language group to determine the appropriate language services for each language;
  - (c) The literacy skills of LEP populations in their native languages, to determine whether translation of documents will be an effective practice; and
  - (d) Whether LEP persons are underserved by the recipient due to language barriers.

**\*\*Of the 97,574 residents of Ashtabula County in the ACTS service areas, 6,439 residents or 6.6% speak a language other than English. 2,244 residents or 2.3% of the population speak English less than very well and 2,146 residents or 2.2% speak Spanish in the home\*\***

## Ashtabula County Transportation System (ACTS) Title VI Program

**(2) The frequency with which LEP persons meet the program. Identifies and assesses the frequency ACTS staff meets LEP persons. Examples of contact could include:**

- (a) Use of bus service;
- (b) Purchase of passes and tickets at the ACTS Operation Center and over the phone;
- (c) Participation in public meetings;
- (d) Customer service interactions;
- (e) Ridership surveys;
- (f) Operator surveys.

**(3) The nature and importance of the program, activity, or service provided by the program to people's lives. Generally, the more important the program, the more frequent the contact and the likelihood that language services will be needed.**

All of ACTS programs are important; however, those related to safety, public transit, nondiscrimination, and public involvement are among the most important. ACTS is committed to providing meaningful access and will provide written translation for any of its documents, when reasonable, effective and with the available resources. ACTS will continually evaluate and update its programs, services, and activities to ensure that persons who may be LEP are always provided with meaningful access. The Title VI policy, complaint form, and LEP policy can be made available in other languages upon request.

Providing public transportation is a vital service, especially for people without access to personal vehicles. Development of a coordinated plan to meet the specific transportation needs of seniors and people with disabilities will often also meet the needs of LEP persons. A person who is LEP may have a disability that prevents the person from using ACTS deviated fixed route service, thus making the person eligible for ADA complementary paratransit.

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

ACTS makes every effort to make its programs, services, and activities, accessible to LEP individuals. ACTS will use available resources, both internal and external to accommodate reasonable requests for translations. Resource and cost issues can often be reduced by technological advances, reasonable business practices, and the sharing of language assistance materials and services among and between recipients, advocacy groups, LEP populations and Federal agencies. Large entities and those entities serving a significant number of LEP persons should ensure that their resource limitations are well substantiated before using this factor as a reason to limit language assistance.

## Ashtabula County Transportation System (ACTS) Title VI Program

ACTS will continue to update the LEP plan as required by the U.S. DOT. At a minimum, the Title VI Plan will continue to be reviewed and updated every three (3) years in conjunction with the Title VI submission and use data from the U.S. Decennial Census or the American Community Survey as available, or when the concentrations of LEP individuals are present in the ACTS service area.

Updates will continue to include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether ACTS's financial resources are sufficient to fund language assistance resources needed.
- Determine whether ACTS has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning ACTS's failure to meet the needs of LEP individuals

The following training will continue to be provided to ACTS staff:

- Information on the ACTS Title VI Procedures and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of "I Speak" language cards (used to identify language preference).
- Documentation of language assistance requests.
- Use of web-based interpreter services (over the phone interpretation provider).
- How to handle a potential Title VI / LEP complaint.

ACTS shall provide for communication for limited English proficient riders to ensure them equal opportunity to benefit from services. Family members or friends of limited English proficient riders will not be used as translators unless specifically requested by that individual. Arrangements have been made with Ashtabula County Job & Family Services and the ACTS Operation Center to obtain translators. ACTS will also utilize web-based translator programs if available.

If you need help with English, please call 440-998-1110, 1-800-935-0242, 440-992-4411 or 1-800-445-4140

Si usted necesita ayuda con el inglés, por favor llame 440-998-1110, 1-800-935-0242, 440-992-4411 or 1-800-445-4140

## Ashtabula County Transportation System (ACTS) Title VI Program

### Minority Representation Information

Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

#### A. Minority Representation Table

Table Depicting Ashtabula County Total Population and Membership of the ACTS Transportation Advisory Committee (TAC)

Body	Caucasian	Hispanic	African American	Asian American	Native American	Two or More Races
Total service area population for Ashtabula County 97,574	86,548 88.7%	4,293 4.4%	3,708 3.8%	488 .5%	293 .3%	2,244 2.3%
Transportation Advisory Committee total members (7)	4 58%		3 42%			

#### B. Efforts to Encourage Minority Participation

To ensure that minorities and people with disabilities are given the opportunity and encouraged to become members of the Transportation Advisory Committee (TAC), ACTS personnel and Ashtabula County officials post notices on the County website and advertise in the local newspapers regarding open positions on the committee.

## Ashtabula County Transportation System (ACTS) Title VI Program

ACTS is not a fixed route transit provider. As such, any information in this document pertaining to fixed route service standards and policies has been deleted.

ACTS does not provide funding to subrecipients.

ACTS has not built a facility.

Ashtabula County Transportation System (ACTS) Title VI Program


Official Signatures



Kathryn L. Whittington, President, Board of County Commissioners

4-16-24

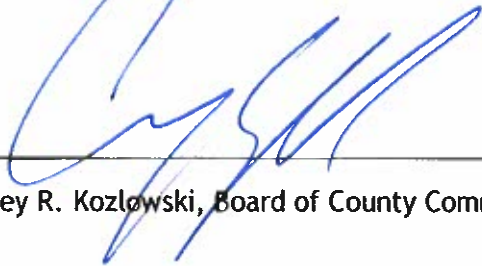
Date



J. P. Ducro, IV, Vice President, Board of County Commissioners

4-16-24

Date



Casey R. Kozłowski, Board of County Commissioners

4-16-24

Date