

**Title VI Program
Miami County Public Transit**

April 20, 2022

**Submitted to:
Federal Transit Administration
200 West Adams Street, Suite 320
Chicago, Illinois 60606**

Miami County Public Transit (MCPT)

Title VI Program Submittal

April 2022

Introduction

The last Title VI for Miami County expires in September. Miami County Public Transit has been in operation as a demand response service since 2000. No fixed route service is provided. MCPT operates with an annual budget of approximately \$1.6 million with a fleet of 18 vehicles, serving a population of approximately 106,987 people. MCPT employs two full time, one part time administrative staff, including a Transportation Director. MCPT has procured a contractor for bus operators and dispatchers. One facility is used for administration, dispatch, vehicle storage, scheduling and other miscellaneous transit services. MCPT charges \$4.00 for a one-way trip anywhere within Miami County. MCPT works closely with Job and Family Services to provide a variety of reduced cost contract trips to clients in various circumstances based on qualifications.

Title VI Complaint and Investigation Procedures

These procedures apply to all complaints filed under Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and all related statutes, relating to any program or activity administered by MCPT or its subrecipients, consultants, and/or contractors. Intimidation or retaliation of any kind is prohibited by law.

These procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies, or to seek private counsel for complaints alleging discrimination. These procedures are part of an administrative process that does not provide for remedies that include punitive damages or compensatory remuneration for the complainant.

Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation meeting(s) between the affected parties and the MCPT may be utilized for resolution, at any stage of the process. The Title VI Coordinator will make every effort to pursue a resolution to the complaint. Any individual, group of individuals or entity that believes they have been subjected to discrimination prohibited under Title VI and related statutes may file a complaint on our website at miamicountyohio.gov/transit or you may file a written complaint to the following address:

Title VI Coordinator
Miami County Public Transit
2036 N. County Road 25A
Troy, OH 45373-2984

The following measures will be taken to resolve Title VI complaints:

- 1.) A formal complaint must be filed within 180 days of the alleged occurrence. Complaints shall be in writing and signed by the individual or his/her representative, and will include the complainant's name, address and telephone number; name of alleged discriminating official, basis of complaint (race, color, national origin, sex, disability, age), and the date of alleged act(s). A statement detailing the facts and circumstances of the alleged discrimination must accompany all complaints. To obtain a complaint form, please see Attachment 4.
- 2.) In the case where a complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to the MCPT Title VI Coordinator. Under these circumstances, the complainant will be interviewed, and the MCPT Title VI Coordinator will assist the complainant in converting the verbal allegations to writing.
- 3.) When a complaint is received, the Title VI Coordinator will provide written acknowledgment to the complainant, within ten (10) days by registered mail.
- 4.) If a complaint is deemed incomplete, additional information will be requested, and the complainant will be provided 60 business days to submit the required information. Failure to do so may be considered good cause for a determination of no investigative merit.

Within 15 business days from receipt of a complete complaint, MCPT will determine its jurisdiction in pursuing the matter and whether the complaint has sufficient merit to warrant investigation. Within five (5) days of this decision, the Executive Director or his/her authorized designee will notify the complainant and respondent, by registered mail, informing them of the disposition.

- a. If the decision is not to investigate the complaint, the notification shall specifically state the reason for the decision.
 - b. If the complaint is to be investigated, the notification shall state the grounds of the MCPT's jurisdiction, while informing the parties that their full cooperation will be required in gathering additional information and assisting the investigator.
- 6.) When the MCPT does not have sufficient jurisdiction, the Executive Director or his/her authorized designee will refer the complaint to the appropriate State or Federal agency holding such jurisdiction.
 - 7.) If the complaint has investigative merit, the Executive Director or his/her authorized designee will assign an investigator. A complete investigation will be conducted, and an investigative report will be submitted to the Executive Director within 60 days from receipt of the complaint. The report will include a narrative description of the incident, summaries of all persons interviewed, and a finding with recommendations and conciliatory measures where appropriate. If the investigation is delayed for any reason, the investigator will notify the appropriate authorities, and an extension will be requested.

8.) The Executive Director or his/her authorized designee will issue letters of finding to the Complainant and Respondent within 90 days from receipt of the complaint.

9.) If the Complainant is dissatisfied with the MCPT resolution of the complaint, he/she has the right to file a complaint with the:

**Regional Civil Rights Officer
Federal Transit Administration
200 West Adams Street, Suite 320
Chicago, Illinois 60606
Phone: (312) 353-3770
Fax: (312) 886-0351**

Record of Title VI Investigations, Complaints, or Lawsuits

None

Monitoring of subrecipients

Miami County Transit has no subrecipients.

Language Assistance Plan

The intent of the plan is to ensure that Limited English Proficiency (LEP) individuals have access to published information and transportation services in Miami County. The production of multilingual publications and documents and/or interpretation at meetings and events will be provided to the degree that funding permits based on current laws and regulations.

MCPT will keep a running log of requests for language assistance to monitor the need of language assistance. Also, every ten years the MCPT will assess the magnitude and nature of any significantly large groups of people with Limited English Proficiency, and any problems they may have, due to such proficiency limits, of obtaining information about and using MCPT services. MCPT will use relevant local, State and Federal demographic data to locate and quantify the number of people within Miami County that have Limited English Proficiency. Significant concentrations or numbers of identified persons or locations will be identified, if any do exist. The language spoken will be identified.

LEP Four Factor Analysis

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service:

The 2015 Civil Rights Language Map indicates that less than 1% of the service area population speak English "less than very well". Due to the relatively small number of LEP riders, and the uneven geographical distribution of such, targeted information concerning LEP is not dispersed.

2. The frequency with which LEP individuals come in contact with the program

Miami County Transit assesses the frequency at which staff does or could possibly have contact with individuals with limited English proficiency. This includes examining census data, documenting phone inquiries, requests for translated documents and staff feedback. Currently, Miami County Transit has never had a request for a translated document, or encountered a client that could not be served due to a language barrier. Staff is trained to alert management at once if there is an individual who cannot be served due to language differences. The service of Miami County does not meet the threshold for the Safe Harbor provision concerning translated documents.

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

Public transportation is vital to many members of our community, thusly it is of the utmost importance that public transit be available and accessible to all individuals, regardless of language spoken.

4. The resources available to the recipient and costs:

Miami County Transit has assessed available resources that could provide language assistance. This may include identifying bilingual staff and prioritizing the hiring of such in dispatch roles, reviewing what services are available from our local universities, and translating pertinent documents. Pictograph books are available for use at all times in the administrative offices and by request on the buses.

In 2018 1.34% of the population in Miami County reports a language other than English spoken at home among persons age five (5) and over. MCPT has extremely limited funding and services but will work with local universities/social service agencies or private providers when necessary to provide interpreters and/or interpreted service information upon request.

Percentage of LEP potential riders is reassessed each time census data is updated, and changes to language access plan made accordingly.

NON-DISCRIMINATION NOTICE

All services, routes and accommodation on Miami County Public Transit (MCPT) are offered without regard to race, color, or national origin, in accordance with Title VI of the Civil Rights Act of 1964. If you feel you have been discriminated against on the basis of race, color, or national origin in the services offered by MCPT, you have the right to submit a complaint to the MCPT management and/or Federal Transit Administration. For more information call MCPT at (937) 440-5488. (Please see Attachment 1)

Title VI Notice to Public

The following is posted on the MCPT website, within MCPT vehicles, and included in all public information materials such as service brochures, notices, etc.

Public Participation Plan

The MCPT shall solicit public input for its Program of Projects annually as well as needed for other general matters such as Language Assistance Plan, raising fares, or carrying out a major service change or reduction using variety of means to communicate to the public these and proposed activities. Notices will include how the public can obtain information and make comments, where meetings are to take place, and other applicable information. The notices for public input will be posted 30 days in advance so the public has time to consider proposals and make comments. The notice methods include:

1. Press release to local media
2. Newsletter (print or e-mail)
3. Website links and articles
4. On vehicle advertising with fliers
5. Posting of fliers at social service agencies

The MCPT meets with the public in the Hearing Room located in the Safety Building at 201 W. Main Street, Troy, OH 45373. This location has access to transit and is centrally located so that everyone in its service area can attend meetings and receive information about the MCPT activities that will impact them. Meetings are held at different times of the day in coordination with route schedules for easier access. All public meeting locations will be accessible to those with disabilities. If notified five (5) days prior to the meeting, language or hearing interpreters will be made available.

The MCPT staff will accept written comments and record oral comments if needed. Meetings will have sign-up sheets available if no one is in attendance, staff will wait 30 minutes and then announce the reason for the meeting, a statement that no one is in attendance and close the meeting. The public is also able to submit comments by letter or e-mail until the time of the public hearing is scheduled to end. Public comments by letter or presented to the Miami County Board of Commissioners as part of the decisions making process.

Inclusive Public Participation, Chapter IV, Part 9, DOT Order 5610

MCPT is an active participant in the Human Services Transportation Coordination Plan (HSTCP). The HSTCP is coordinated by our Metropolitan Planning Organization (MPO), Miami Valley Regional Planning Commission (MVRPC). The HSTCP not only ensures compliance with 5307 formula funds but makes us eligible for JARC/New Freedom funds along with other agencies in our county.

MVRPC throughout the process of initiating the HSTCP implemented the public participation policy to ensure that all interested parties, including minority persons and private individuals, were given a forum in which to discuss any concerns they might have.

MCPT facilitates a Transit Advisory Committee (TAC) meeting quarterly. The meetings occur in March, June, September and December on a date chosen by the Transportation Manager. Typically, the date is the second or third Monday of the applicable month.

At the MCPT office, we have a quarterly Advisory Committee meeting in which we involve people that work with those who need help (people who are low-income, elderly, disabled, LEP, etc.). The transportation manager, a transit specialist and the manager of First Transit are always present in these meetings. We usually invite a County Commissioner to attend along with other community representatives like Miami County's Job and Family Service's Director who works with us for Medicaid rides, PRC rides and Title XX rides. Title XX's program is funded through Job and Family Services and is a contract that MCPT holds that offers those with low-income to receive free rides monthly. Our TAC committee includes community representatives that are chosen from our frequent transit riders. We are currently in search of representatives to fill these positions. Note that the table below will fluctuate with the addition of members.

Body	Caucasian	Hispanic	Black/African American	Asian American	Native American
Population	94.4%	1.3%	2%	1.2%	0.2%
Transit Advisory Committee	83.33%	0%	16.67%	0%	0%

Transit Advisory Committee members are notified by US Mail or e-mail and in some cases both. Invitations are sent out at the beginning of the month in which the meeting will take place. Meeting minutes are e-mailed to TAC members, along with their meeting invitation. TAC meeting minutes are approved by the Transportation Manager after the meeting takes place.

Transit Advisory Committee meetings are officiated by the Transportation Manager. Typically, updates are given by the Miami County Transportation Manager, the contractor's General Manager and other community representatives. The meetings have a casual discussion format. Questions and concerns from TAC members are often voiced and addressed.

Please see Attachment 2

Demographic Data Collection

All information below was taken directly from Miami County economic development department.

Located in Southwestern Ohio, Miami County offers beautiful farmland, the Great Miami River, and charming cities and villages. There are 12 townships in the county and a population of 106,987. The county seat is the city of Troy.

Miami County is located in the northern portion of the Greater Dayton Region in West Central Ohio, USA. Best known for the invention of flight by the Wright Brothers, the Region has continued its rich history in technology, innovation and advanced manufacturing. More than 600 aerospace-related defense contractors and R&D organizations thrive in the region. The region boasts more than 250 advanced automotive component manufacturers for nearly all the major automotive companies. Due to the presence of Wright-Patterson Air Force Base, the region is home to approximately 25,000 scientists, engineers, computer specialist and skilled technicians.

The region is located in the nation's tenth largest "90-minute" land market. More than 5.6 million people live within a 90-minute radius of the region and 61% of the U.S. population lies within 600 miles. Region is also served by four interstates (I-70, I-71, I-75 and I-675) and two limited access highways, making it easy to move your product anywhere in the global marketplace.

Ranked as one of the "Most affordable housing markets," by the National Association of Home Builders Housing Index, the region offers diverse housing from historic districts to modern subdivisions. In fact, the region was recently ranked "Among the best places to live in the U.S." "The Median Household Income for Miami County residents in 2018 was \$57,544, which is above the Ohio and National averages.

Miami County and the region offer a wide variety of first-class educational and training opportunities. Our technical schools and colleges are looked upon as "model programs" that have become the benchmark in their respective educational markets. In total, twenty-five institutions of higher learning are located within about an hour drive of Miami County.

While Miami County and the Greater Dayton Region are well known as a great place to work, the region is also a great place for recreation and play. Enjoy a high school football game on Friday night and a nearby college or professional sport on Saturday afternoon. From little league to biking, from hiking to theater-- the cultural and recreational opportunities are here in Miami County.

Population and Household Data

- Miami County (pop. 106,987) is part of the Greater Dayton Ohio region. The Dayton Region is comprised of 12 counties with a total population of approximately 1.2 million people. The Metropolitan Statistical Area (MSA) which includes the central 4 counties in the region, has a population just under 1 million.

Income & Rankings

Miami County's wage and income statistics are above the Ohio and National averages:

- Median Household Income \$57,544
- Per capita income \$29,703

Persons at or below poverty 7.9%

Housing & Home Ownership

- 79.1% of homes were built prior to 1980
- 20.9% of homes were built between 1980 and 2000
- 69.9% of homes are owned by occupant, 30.1% rentals
- Median value of owner-occupied housing units is \$145,800
- Median gross rent is \$767 per month

Miami County's homeownership rate is above average at 84.7% with a median housing value of \$145,800.

Education, Colleges & Universities

The region boasts nine 4-year and three 2-year colleges offering a wide variety of certificates and advanced degrees. Within a 60-mile radius, the offerings grow to twenty-six institutions offering degrees in advanced technologies, biomedicine, research, and information technologies.

Additional Miami County Education Statistics:

- 28.1% High School graduate or higher
- 17.5% Bachelor's degree or higher
- 25.4% Some College or Associate Degree

Miami County demographics, expected trends such as the growing number of residents who will be unable to drive a car, and the current reality of transportation-disadvantaged persons being stranded and isolated from economic opportunity, health care, supportive

agency programs and services, shopping, and other community services point to the need for affordable, convenient options.

Currently, the only publicly supported transit system in Miami County is the Miami County Transit System (MCPTS). Additional transportation services in Miami County are included (see Attachment 3)

Attachment 1-English

Your Rights Under

Title VI

Of the Civil Rights Act of 1964

All services, routes and accommodations on Miami County Public Transit (MCPT) are offered without regard to race, color, or national origin, in accordance with Title VI of the Civil Rights Act of 1964. Note that Title VI does not address gender discrimination. Other Civil Rights laws prohibit gender discrimination.

If you feel you have been discriminated against on the basis of race, color, or national origin in the services offered by MCPT, you have the right to submit a complaint to the MCPT management and/or Federal Transit Administration. For more information, please visit our Title VI section of our website at miamicountyohio.gov/transit or you can contact the Federal Transit Administration (FTA) Office of Civil Rights, 200 West Adams Street, Suite 320 Chicago, Illinois 60606. Federal and State law requires complaints be filed within one-hundred eighty (180) calendar days of the last alleged incident.

To request additional information on MCPT's non-discrimination obligations or to file a Title VI Complaint, Please submit your request online or by mail to :

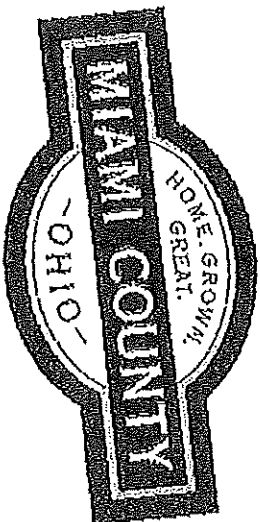
CIVIL RIGHTS LIAISON

MIAMI COUNTY PUBLIC TRANSIT

2036 N Co. Rd. 25-A Troy, OH 45373

(937)440-5488 Fax: (937)440-5487

Title VI is the Law



Attachment 1 - Spanish

Sus Derechos Bajo

Título VI

De La Ley de Derechos Civiles de

Todos los servicios, rutas y alojamiento en el Transporte Público del Condado de Miami (MCPT) se ofrecen sin distinción de raza, color u origen nacional, de acuerdo con el Título VI de la Ley de Derechos Civiles de 1964. Tenga en cuenta que el Título VI no aborda la discriminación de género. Otras leyes de derechos civiles prohíben la discriminación de género.

Si siente que ha sido discriminado por motivos de raza, color u origen nacional en los servicios ofrecidos por MCPT, tiene derecho a presentar una queja ante la administración de MCPT y / o la Administración Federal de Tránsito. Para obtener más información, visite nuestra sección Título VI de nuestro sitio web en miamicountyohio.gov/transit o puede comunicarse con la Oficina de Derechos Civiles de la Administración Federal de Tránsito (FTA), 200 West Adams Street Suite 320 Chicago, Illinois 60606. Leyes federales y estatales requiere que las quejas se presenten dentro de los ciento ochenta (180) días calendario del último presunto incidente. Para solicitar información adicional sobre las obligaciones de no discriminación de MCPT o para presentar una Queja del Título VI, envíe su solicitud en línea o por correo a:

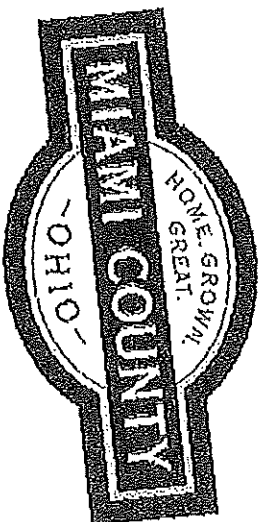
Enlace de Derechos Civiles

Transito del Conadado de Miami

2036 N Co. Rd. 25-A Troy, OH 45373

(937)440-5488 Fax: (937)440-5487

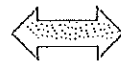
Title VI is the Law



Attachment 2

TAC Meetings

TAC Meetings are initiated quarterly by Miami County Transportation Manager.



March
June
September
December
2nd or 3rd Monday
of applicable
month

Who is on the TAC Committee?

- Commissioner
- Transportation Manager
- MRDD Staff
- Mayors
- Veterans Services
- Other area transit providers- ie Contractors
- JFS Director
- ODOT Representative
- 3 Clients

How are the meetings Initiated?

Miami County Transit sends notification of meetings by mail, electronic notification (e-mail) and in some cases both to everyone on the TAC committee.

Meeting minutes are mailed with the invitation

Who talks and what is covered?

When are the invitations sent? The invitations are sent at the beginning of the meeting month.

The meetings are casual and there is an opportunity for a question and answer session from all attendees.

Miami County Transit Manager – Miami County Transit updates – Top three locations and other Ridership data.
Also, any significant transit news. Miami County Contractor – Miami County Transit updates
Other representatives' updates.

Attachment 3

Miami County Transportation Service Options

Please remind caller
Information (pricing
and availability) is
subject to change.

Miami County

Transit

335-7433 (RIDE)

Open to the Public

M-F 5:00 AM – 6:00 PM
Sat 8:00 AM – 2:00 PM

One Way Trip within
Miami County \$4.00

Request 24 hour notice
to schedule trip

Miami County Job and Family Services

440-3471

2040 N. County Road 25A

Troy, OH 45373

The program offers free medical transportation to persons who have a medical card. The client will use the Miami County Transit service. The client cannot own a car. Call and ask for medical transportation, wheelchair accessible.

Partners In Hope

339-8792

180 E. Race St.

Troy, OH 45373

Provides limited free transportation to ambulatory, elderly and disabled residents in Troy, transporting up to fifty miles from their Troy office. If possible, they will transport other Miami County residents.

Miami/Shelby

County Transit

Connection

48 Hour Advance Notice

Shelby County
Scheduling Number

937-492-6117

Monday – Friday

5:15 AM – 4:00 PM

General Public:

\$5.00 per one-way trip

Blue Card:

\$2.50 Per one-way trip

Miami County
Scheduling Number 937-

335-7433

Monday – Friday

5:00 AM – 4:00 PM

General Public:

\$4.00 one-way trip

Blue Card:

\$2.00 one-way trip

Dayton Service

7-9 Days in Advance

Monday – Friday

8:00AM – 3:00 PM

937-335-7433

**Dayton Children's
Hospital
Dayton Int. Airport**

One-way Trip - \$26.00
Emergency contact form
must be filled out prior
to drop-off destination.
Blue Card fare: \$13.00
one-way trip

Miami County Veterans

440-8126

510 W. Water St., Suite 140

Troy, OH 45373-2986

Monday - Friday

8:00 AM to 12:00 PM and 1:00 PM to 4:00 PM

Provides free transportation to Miami County Veterans, daily transporting veterans to the Dayton V.A. Medical Center. (Non-Emergency)

Greenville Transit

Connection

937-547-1811

Every 3rd Tuesday
9AM – 3PM (last pick-up)

Greenville National Bank
to Greenville city limits:
\$12.00

Greenville Transit –
every mile outside of city
limits is a \$1.00.

Greenville National Bank
to Greenville city limits:
\$12.00

Area Wide Taxi

339-2367

Transports anyone,
anywhere (8AM –
10:00 PM) for a fee.
Troy to Tipp or Troy to
Piqua \$15.00 fee. Troy
to Troy \$10.00 fee,
otherwise \$2.00 per
mile to any destination.
Call at least one hour in
advance.

AMBULANCE TRANSPORTATION SERVICES

All ambulance services operate 24 hours a day, several days a week.
All are wheelchair accessible and stretcher and bed bound
accessible.

Spirit Medical Transp. 937-548-2800
Integrity Ambulance Service 937-316-6100

Goodwill Easter

Seals

660 S Main St.,

Dayton, OH 45402

937-528-6357

Attachment 4

Miami County Transit

Title VI Complaint Form

Complaints must be filed within 180 days of the alleged act of discrimination

Section I

Name: _____

Address: _____

Telephone Number:

Home: _____ Work: _____

Email: _____

Accessible Format Requirements?

Large print ___ Audio ___ Other (please specify) _____

Section II

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 provide the name and relationship of the person for whom you are filing this complaint:

Please explain why you have filed for a third party _____

If filing on behalf of a third party, have you obtained the permission of the aggrieved party?

Section III

Have you previously filed a Title VI complaint with this agency (Miami County Transit)?

Yes___ No___

Please select the class that is the basis for this complaint

___ Race ___Color ___National Origin

Section IV

Details: In the below area, or on a separate sheet as needed, please describe your complaint in detail. Please include any specifics such as names, dates, times, witnesses, and any other information that would assist in the investigation of your allegations. If there is any documentation that is relevant to this complaint, please include. Also, please indicate the basis of the complaint; race, color, national origin, gender, age, disability, income status, familial status, or military status.

Signature: _____

Date: _____

[Unsigned forms cannot be processed.]

Please mail your completed form to:

Sarah Baker
Civil Rights Liaison
Miami County Transit
2036 N Co. Rd. 25-A
Troy, OH 45373

Equity Analysis for Building Site:

None.

System-Wide Service Standards and Policies

Miami County Transit is an entirely demand response service, operating 18 vehicles at peak times.