

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

*Version 1223*

**JACKSON COUNTY BOARD ON AGING, INC.**

Effective Date of Plan:  
**December 10, 2025**

**Title VI Contact Information**

Contact (Position): Executive Director

Contact Phone Number: 740-286-2909

Contact Email: <https://www.jacksoncountyboardonaging.org/>

Mailing Address: 25 E. Mound Street, Jackson, Ohio 45640

Website: In process of being created

**Language Interpretation Assistance**

Interpretation Services Provided By (Company or Service Name): Language Line Services

For Interpreter Services Individuals Will Call (Phone Number): 1-800-930-2580

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

The JACKSON COUNTY BOARD ON AGING, INC. Title VI plan includes the following elements:

1. Plan Approval, Annual Certifications and Assurances, Revision Log
2. Policy Statement
3. Notice to the Public
4. Complaint Procedure
5. Complaint Form
6. List of transit related Title VI Investigations, Complaints and Lawsuits
7. Public Participation Plan
8. Language Assistance Plan
9. Minority Representation Table and Description
10. Providing Assistance to and Monitoring Subrecipients
11. Title VI Equity Analysis for Facility Acquisition
12. Fixed Route Transit Provider Requirements
13. MPO Requirements

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

# AUTHORIZING RESOLUTION

Resolution No: 20251210  
A resolution authorizing the filing of (an) application(s) with the Ohio Department of Transportation by  
Jackson County Board on Aging, Inc.

for grants through the US DOT Federal Transit Administration (FTA) and the State of Ohio, as authorized under Federal Transit Laws and State of Ohio laws executing a contract with the Ohio Department of Transportation upon project approval.

WHEREAS, the Director of the Ohio Department of Transportation is authorized to make grants for the 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 if applicable;

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 an application for assistance the applicant gives 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

NOW, THEREFORE, BE IT RESOLVED BY  
Jackson County Board on Aging, Inc.

1. That Susan Morgan, Executive Director  
is authorized on behalf of Jackson County Board on Aging, Inc.

- a. to execute and file
  - i. Proposals to aid in the financing of capital, operating, and planning assistance projects;
  - ii. Grant agreements with the Ohio Department of Transportation for aid in the financing of capital, operating, and planning assistance projects;
  - iii. An 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; and
  - iv. Set forth affirmative disadvantage business policies in connection to any procurement made as part of the project.

2. That Susan Morgan, Executive Director  
is authorized to furnish such additional information as the Ohio Department of Transportation may require in connection with the proposal for the program of projects submitted to the Federal Transit Administration and the State of Ohio.

3. The undersigned duly qualified and acting Susan Morgan, Executive Director  
of the Jackson County Board on Aging, Inc.

certifies that the foregoing is a true and correct copy of a resolution, adopted at a legally convened meeting of the

Jackson County Board on Aging, Inc. Held on 12/19/2025

Jane Pulmator President 12/19/2025  
Signature of Recording Officer, Title Date

**Annual Certifications and Assurances**

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with Title VI regulations. This requirement shall be fulfilled when the applicant/recipient submits its annual certifications and assurances. Primary recipients will collect Title VI assurances from sub-recipients prior to passing through FTA funds.

JACKSON COUNTY BOARD ON AGING, INC. will remain in compliance with this requirement by annual submission of certifications and assurances as required by ODOT.

The date of last submission of these certifications and assurances (at the time of this Plan’s approval) is:05/02/2022

**Title VI Plan Revision Log**

<b>Date</b> Month/day/year	<b>Section Revised</b>	<b>Summary of Revisions</b>

## **Section 2: Title VI Policy Statement**

### **Policy Statement**

JACKSON COUNTY BOARD ON AGING, INC., operating demand response transit provider, 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. JACKSON COUNTY BOARD ON AGING, INC. operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act.

**Section 3: Notice to the Public**

**Title VI Notice to the Public**

JACKSON COUNTY BOARD ON AGING, INC.'s Notice to the Public is as follows:

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

**JACKSON COUNTY BOARD ON AGING, INC.**

- The JACKSON COUNTY BOARD ON AGING, INC. 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 JACKSON COUNTY BOARD ON AGING, INC..
- For more information on the JACKSON COUNTY BOARD ON AGING, INC.'s civil rights program, the procedures to file a complaint, or to file a complaint, please contact the Executive Director at 740-286-2909 (TTY 800-750-0750); email <https://www.jacksoncountyboardonaging.org/>; or visit our administrative office at 25 E. Mound Street, Jackson, Ohio 45640. For more information, visit <https://www.jacksoncountyboardonaging.org/>.
- For transportation-related Title VI matters, a complaint may also be filed directly with the:
 

Ohio Department of Transportation, Attn: Office of Opportunity, Diversity, and Inclusion, Title VI Coordinator, 1980 West Broad Street, Mailstop 3270, Columbus, Ohio 43223

Federal Transit Administration, Office of Civil Rights, Attention: Complaint Team, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.
- If information is needed in another language, contact 1-800-930-2580.

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, as long as the type, timing, and frequency are sufficient to notify passengers and other interested persons of their rights under DOT's Title VI regulations with regard to the recipient's program.* As such, JACKSON COUNTY BOARD ON AGING, INC.'s Notice to the Public can be found at the following locations (check all that apply):

- In public areas of the office, including reception room and meeting rooms.
- On the agency website.
- In the agency brochure.
- In the agency vehicles.

At stations and/or stops.

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

JACKSON COUNTY BOARD ON AGING, INC.'s Title VI Complaint Procedure is made available in the following locations:

- Agency website at: <https://www.jacksoncountyboardonaging.org/>
  - Hard copy in the central office
  - Agency Title VI Plan
- 

Any individual, group of individuals or entity that believes they have been discriminated against on the basis of race, color, or national origin by JACKSON COUNTY BOARD ON AGING, INC. 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 JACKSON COUNTY BOARD ON AGING, INC. 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, JACKSON COUNTY BOARD ON AGING, INC. will review it to determine if our office has jurisdiction. A copy of each Title VI complaint received will be forwarded to the New Hampshire Department of Transportation within ten (10) calendar days of receipt. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

JACKSON COUNTY BOARD ON AGING, INC. has 45 days to investigate the complaint. If more information is needed to resolve the case, JACKSON COUNTY BOARD ON AGING, INC. may contact the complainant requesting further information. 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 **30** business days, JACKSON COUNTY BOARD ON AGING, INC. can administratively close the case.

After the investigator reviews the complaint, the agency will issue one of two (2) letters to the complainant: a closure letter or a letter of finding (LOF).

- ✓ A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.
- ✓ A letter of finding (LOF) summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur.

If the complainant wishes to appeal the decision it must direct the appeal to the agency initially. The complainant has **30** days after the date of the closure letter or the letter of finding to do so. If there is

outstanding concern, the appeal may be directed to the state DOT or FTA. The appeal process information will be included in the letter.

A person may also file a complaint directly with the: Ohio Department of Transportation, Attn: Office of Opportunity, Diversity and Inclusion 1980 West Broad Street, Mailstop 3270, Columbus, OH 43223  
Or

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

If information is needed in another language, then contact 1-800-930-2580.

**Section 5: Title VI Complaint Form**

JACKSON COUNTY BOARD ON AGING, INC.'s Title VI Complaint Procedure is made available in the following locations:

- Agency website, if available: <https://www.jacksoncountyboardonaging.org/>
- Hard copy in the central office
- Agency Title VI Plan

<b>Section I:</b>					
Name:					
Address:					
Telephone (Home):			Telephone (Work):		
Email Address:					
Accessible Requirements?	Format	Large Print		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 this form.					
_____					
_____					
_____					
<b>Section IV</b>					
Have you previously filed a Title VI complaint with this agency?			Yes	No	
<b>Section V</b>					
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?					
<input type="checkbox"/> Yes		<input type="checkbox"/> No			
If yes, check all that apply:					
<input type="checkbox"/> Federal Agency: _____					

<input type="checkbox"/> Federal Court _____	<input type="checkbox"/> State Agency _____
<input type="checkbox"/> State Court _____	<input type="checkbox"/> Local Agency _____
Please provide information about a contact person at the agency/court where the complaint was filed.	
<b>Name:</b>	
<b>Title:</b>	
<b>Agency:</b>	
<b>Address:</b>	
<b>Telephone:</b>	
<b>Section VI</b>	
Name of agency complaint is against:	
Contact person:	
Title:	
Telephone number:	

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

Signature and date required below

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

If information is needed in another language, contact 1-800-930-2580.

Please submit this form to:

**JACKSON COUNTY BOARD ON AGING, INC.**  
**Executive Director**  
**25 E. Mound Street, Jackson, Ohio 45640**  
**740-286-2909**  
<https://www.jacksoncountyboardonaging.org/>

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

JACKSON COUNTY BOARD ON AGING, INC. maintains a list or log of all Title VI investigations, complaints, and lawsuits, pertaining to its transit-related activities.

**Check One:**

There have been no investigations, complaints, and/or lawsuits filed against JACKSON COUNTY BOARD ON AGING, INC. since the last plan submission.

There have been investigations, complaints, and/or lawsuits filed against JACKSON COUNTY BOARD ON AGING, INC.. See list below. Additional information is to be attached as needed.

	<b>Date</b> (Month, Day, Year)	<b>Summary</b> (include basis of complaint: race, color, or national origin)	<b>Status</b>	<b>Action(s) Taken</b>
<b>Investigations</b>				
None	Click or tap to enter a date.			
	Click or tap to enter a date.			
<b>Lawsuits</b>				
None	Click or tap to enter a date.			
	Click or tap to enter a date.			
<b>Complaints</b>				
None	Click or tap to enter a date.			
	Click or tap to enter a date.			

**Section 7: Public Participation Plan**

**Strategies and Desired Outcomes**

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

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

**Public Outreach Activities**

The public outreach and involvement activities conducted by JACKSON COUNTY BOARD ON AGING, INC. since the last Title VI Program submission are summarized in the table below.

Specific Public Participation activities are listed in the table below:

<b>Event Date</b>	<b>Insert Agency Name</b> Staffer(s) or Department	<b>Activity</b>	<b>Communication Method</b> (Public notice, posters, social media)	<b>Notes</b>
	Jackson County Board on Aging, Inc.	Healthy Aging Fair, County Fair, Apple Festival, social media, senior citizens day	Handouts, public notice, social media	These are all yearly events that we attend every year.

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

### ***Plan Components***

As a recipient of federal US DOT funding, JACKSON COUNTY BOARD ON AGING, INC. 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.

JACKSON COUNTY BOARD ON AGING, INC.'s Language Assistance Plan includes the following elements:

Item #1: The results of the *Four Factor Analysis*, including a description of the LEP population(s), served.

Item #2: A description of how language assistance services are provided by language

Item #3: A description of how LEP persons are informed of the availability of language assistance service

Item #4: A description of how the language assistance plan is monitored and updated

Item #5: A description of how employees are trained to provide language assistance to LEP persons

### ***Four Factor Analysis Methodology***

To determine if an individual is entitled to language assistance and what specific services are appropriate, JACKSON COUNTY BOARD ON AGING, INC. has conducted a *Four Factor Analysis* of the following areas: 1) Limited-English Proficient (LEP) Speaker Demography, 2) Contact Frequency, 3) Importance of Service, and 4) Resources and Costs.

**Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.** In addition to the number or proportion of LEP persons served, JACKSON COUNTY BOARD ON AGING, INC. will identify:

- (a) How LEP persons interact with the recipient's agency;
- (b) Identification of LEP communities, and assessing the number or proportion of LEP persons from each language group to determine the appropriate language services for each language;
- (c) The literacy skills of LEP populations in their native languages, in order to determine whether translation of documents will be an effective practice; and
- (d) Whether LEP persons are underserved by the recipient due to language barriers.

**Factor 2: The frequency with which LEP persons come into contact with the program:** Identifies and assesses the frequency JACKSON COUNTY BOARD ON AGING, INC.'s staff comes into contact with LEP persons. Examples of contact could include:

- (a) Use of bus and rail service;
- (b) Purchase of tickets through vending machines, outlets, websites, and over the phone;
- (c) Participation in public meetings;
- (d) Customer service interactions;
- (e) Ridership surveys;
- (f) Operator surveys.

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

**Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.** Resource and cost issues can often be reduced by technological advances, reasonable business practices, and the sharing of language assistance materials and services among and between recipients, advocacy groups, LEP populations and Federal agencies. Large entities and those entities serving a significant number of LEP persons should ensure that their resource limitations are well substantiated before using this factor as a reason to limit language assistance.

Item #1 – Results of the Four Factor Analysis (including a description of the LEP population(s) served)

**Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered.**

Of the 30,476 residents in JACKSON COUNTY BOARD ON AGING, INC.’s service area, 1% residents describe themselves as speaking English less than “very well”. People of Hispanic descent are the primary LEP persons likely to utilize JACKSON COUNTY BOARD ON AGING, INC. services. For JACKSON COUNTY BOARD ON AGING, INC.’s service area, the latest U.S. Census Bureau data shows that among the area’s population 1% speak English “less than very well.” **For these groups** who speak English “less than very well”, 1% speak Spanish.

Jackson County – Languages Spoke at Home

	Total Number	Percent of Population	Total Population of County
Speak Language other than English	843	2.8	30,476
Speak English Less than Very Well	161	0.53	30,476
Spanish	125	0.41	30,476
Other Indo-European Languages	117	0.38	30,476
Asian and Pacific Island Languages	32	0.11	30,476
Other Languages	569	1.87	30,476

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

Insert Agency Name assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. Jackson County Board on Aging, Inc. provides approximately 20 passenger trips per year. If an individual has speech limitations, the dispatcher or driver will work with the Ohio Department of Transportation, if needed, to ensure the individual receives access to the transit services.

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

All of JACKSON COUNTY BOARD ON AGING, INC.'s programs are important; however, those related to safety, public transit, nondiscrimination and public involvement are among the most important. JACKSON COUNTY BOARD ON AGING, INC. is committed to providing meaningful access and will provide written translation for any of its documents, when reasonable, effective and with the available resources. In other cases, JACKSON COUNTY BOARD ON AGING, INC. will strive to provide alternative but meaningful accessibility. Moreover, JACKSON COUNTY BOARD ON AGING, INC. continually evaluates its programs, services, and activities to ensure that persons who may be LEP are always provided with meaningful access. The Title VI policy, complaint form, and LEP policy are available in English and Spanish upon request.

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

JACKSON COUNTY BOARD ON AGING, INC. makes every effort to make its programs, services, and activities, accessible to LEP individuals. JACKSON COUNTY BOARD ON AGING, INC. will use available resources, both internal and external to accommodate reasonable requests for translations.

Item # 2 – Description of how Language Assistance Services are Provided, by Language

JACKSON COUNTY BOARD ON AGING, INC. has identified, developed, and uses the following:

- a) Individuals who have contact with the public are provided with "I Speak" language cards to identify language needs in order to match them with available services. Language cards verified and distributed by the Director as need.
- b) JACKSON COUNTY BOARD ON AGING, INC. has developed partnerships with local agencies, organizations, law enforcement, colleges/universities, local school districts and social service agencies that are available to assist with it LEP responsibilities.
- c) A list of web-based translation services can be provided by contracting the Human Resources Department.

Item # 3 – Description of how LEP Persons are Informed of the Availability of Language Assistance Service

In order to ensure that LEP individuals are aware of JACKSON COUNTY BOARD ON AGING, INC.'s language assistance measures, JACKSON COUNTY BOARD ON AGING, INC. provides the following:

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

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

JACKSON COUNTY BOARD ON AGING, INC. will continue to update the LEP plan as required by U.S. DOT. At a minimum, the Title VI Plan will continue to be reviewed and updated every three (3) years in conjunction with the Title VI submission and use data from the U.S. Decennial Census or the American Community Survey as available, or when it is clear that the concentrations of LEP individuals are present in JACKSON COUNTY BOARD ON AGING, INC. 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 JACKSON COUNTY BOARD ON AGING, INC.'s financial resources are sufficient to fund language assistance resources needed.
- Determine whether JACKSON COUNTY BOARD ON AGING, INC. has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning JACKSON COUNTY BOARD ON AGING, INC.'s failure to meet the needs of LEP individuals

Item # 5 - Description of how Employees are Trained to Provide Language Assistance to LEP Persons
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The following training will continue to be provided to JACKSON COUNTY BOARD ON AGING, INC. staff:

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

Limited English Proficient (LEP) Resource Materials:

LEP Policy

JACKSON COUNTY BOARD ON AGING, INC. shall provide for communication for limited English proficient riders to ensure them equal opportunity to benefit from services. Family members or friends of limited English proficient riders will not be used as translators unless specifically requested by that individual. Arrangements have been made with Language Line Services to obtain translators. The agency will also utilize web-based translator programs if available.

**If you need help with English, please call 1-800-930-2580**

**Si usted necesita ayuda con el inglés, por favor llame 1-800-930-2580**

# "I Speak" Language Identification Card

Note: For additional languages visit the US Census Bureau website <http://www.lep.gov/ISpeakCards2004.pdf>

Mark this Box if you speak...	Language Identification Chart	Language
	Mark this box if you read or speak English	English
	Marque esta casilla si lee o habla español	Spanish
	Kos lub voj no yog koj paub twm thiab hais lus Hmoob	Hmong
	如果说中国在方框内打勾	Chinese
	Xin ñaùnh daáu vaø oâ naøÿ neáu quyù vò bieát ñoïc vaø noùi ñöôïc Vieät Ngöõ.	Vietnamese
	당신이한국어말할경우이 상자를표시	Korean
	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	Tagalog
	Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen	German
	Отметить этот флажок, если вы говорите по-русски	Russian
	Означите ову кућицу ако говорите српски	Serbian
	आप हिंदी बोलते हैं तो इस बक्से को चिह्नित करें	Hindi
	پر نشان لگائیں تو اس باکس بولتے ہیں اردو اگر آپ	Urdu

## Log of LEP Encounters

Date	Time	Language Spoken By Individual <i>(if available)</i>	Name and Phone Number of Individual <i>(if available)</i>	Service Requested	Follow Up Required	Staff Member Providing Assistance	Notes

**Section 9: Minority Representation Information**

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

**\*Guidance:** Elected transit-related board, committee, or council, do not need to complete the table below, and write in section B that there are no non-elected transit-related boards, committees, or councils.

**A. Minority Representation Table**

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

<b>Body</b>	<b>Caucasian</b>	<b>Hispanic</b>	<b>African American</b>	<b>Asian American</b>	<b>Native American</b>	<b>Two or More Races</b>
Service area is Jackson County which includes 12 townships						
Jackson County Board on Aging, Inc. Board Members	10 members and all are Caucasian					

*Note: insert the number of people and % of total board membership*

**B. Efforts to Encourage Minority Participation**

*To encourage participation on its boards, committees, and councils, the JACKSON COUNTY BOARD ON AGING, INC. will make every effort to encourage minority participation on the boards. Detail any further efforts below.*

## **Section 10: Providing Assistance to and Monitoring Subrecipients**

1. Does agency provide funding to subrecipients?

No, the agency does not have subrecipients.

Yes. If yes, list the subrecipient names: [Click or tap here to enter text.](#)

JACKSON COUNTY BOARD ON AGING, INC. monitors subrecipients using the following process:

1. JACKSON COUNTY BOARD ON AGING, INC. uses the following process for ensuring all subrecipients are complying with the general reporting requirements of FTA Circular 4702.1B:

[Click or tap here to enter text.](#)

2. JACKSON COUNTY BOARD ON AGING, INC. collects Title VI programs from the subrecipients listed above and reviews programs for compliance by doing the following:

[Click or tap here to enter text.](#)

## **Section 11: Title VI Equity Analysis for Facility Acquisition**

Title 49 CFR, Appendix C, Section (3)(iv) requires “the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin.” For purposes of this requirement, “facilities” does not include bus shelters, as they are considered transit amenities. It also does not include transit stations, power substations, or any other project evaluated by the National Environmental Policy Act (NEPA) process. Facilities included in the provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. Has the agency built a facility? Check a response below.

No, JACKSON COUNTY BOARD ON AGING, INC. has not built a facility.

Yes, JACKSON COUNTY BOARD ON AGING, INC. has built a facility and completed a Title VI equity analysis to compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site. Include at the end of the Title VI plan a copy of the Title VI equity analysis.

## **Section 12: Fixed Route Transit Providers Service Standards and Policies**

*FTA Circular 4702.1B, Chapter III, Paragraph 10: All fixed route transit providers shall set service standards and policies for each specific fixed route mode of service they provide.*

JACKSON COUNTY BOARD ON AGING, INC. is **not** a fixed route transit provider. As such, the remainder of Section 12 is not applicable to JACKSON COUNTY BOARD ON AGING, INC. and may be deleted from this document.

JACKSON COUNTY BOARD ON AGING, INC. is a fixed route transit provider. As such, the remainder of Section 12 is applicable to JACKSON COUNTY BOARD ON AGING, INC. and is to be filled out completely.

*All Fixed Route Transit Providers must submit:*

- All requirements set out in Chapter III (General Requirements)
  - Service standards
    - Vehicle load for each mode
    - Vehicle headway for each mode
    - On time performance for each mode
    - Service availability for each mode
  - Service policies
    - Transit Amenities for each mode
    - Vehicle Assignment for each mode

JACKSON COUNTY BOARD ON AGING, INC. has adopted the following system-wide standards and policies to ensure service design and operations practices do not result in discrimination on the basis of race, color, or national origin. Service policies differ from service standards in that they are not necessarily based on a quantitative threshold.

### **Service Standards**

FTA requires that all fixed route transit providers develop quantitative standards for all fixed route modes of operation for the following indicators. JACKSON COUNTY BOARD ON AGING, INC. has prepared standards for all modes it operates including

a. Vehicle Load

Vehicle Type	Average Passenger Capacities			
	Seated	Standing	Total	Maximum Load Factor
15' Mini-Bus	28	2	30	1.1
40' Low Floor Bus	39	12	51	1.3
40' Standard Bus	43	17	60	1.4
Light Rail Vehicle	64	69	133	2.1

b. Vehicle Headway

<b>POLICY HEADWAYS AND PERIODS OF OPERATION</b>				
<b><u>WEEKDAY</u></b>	<b><u>Peak</u></b>	<b><u>Base</u></b>	<b><u>Evening</u></b>	<b><u>Night</u></b>
Regional Trunk	10	15	15	30
Urban Radial	15	15	30	60
Cross-Town	15	15	30	--
Secondary Radial	30	30	60	--
Feeder	30	30	60	--
Peak Express	30	--	--	--
Employer Feeder	60	--	--	--
<p><i>* Peak: 7-9 am and 4-6 pm; Base 9am - 4pm; Evening: 6-9:30 pm; Night: 9:30pm-Midnight;</i>  <i>"--" means no service is provided during that time period.</i></p>				

<b>SATURDAY</b>	<b>Day</b>	<b>Evening</b>	<b>Night</b>
Regional Trunk	15	30	30
Urban Radial	30	60	--
Cross-Town	15	30	--
Secondary Radial	60	60	--
Feeder	60	60	--
Peak Express	--	--	--
Employer Feeder	--	--	--
<p><i>* Day 7am - 6pm; Evening: 6-9:30 pm; Night: 9:30pm – Midnight;</i>  <i>"--" means no service is provided during that time period.</i></p>			

<b>SUNDAY</b>	<b>Day</b>	<b>Evening</b>	<b>Night</b>
Regional Trunk	30	60	--

Urban Radial	30	60	--
Cross-Town	30	--	--
Secondary Radial	--	--	--
Feeder	--	--	--
Peak Express	--	--	--
Employer Feeder	--	--	--
<i>* Day 7am - 6pm; Evening: 6-9:30 pm; Night: 9:30pm-Midnight;</i> <i>"--" means no service is provided during that time period.</i>			

c. On-Time Performance

A vehicle is considered on time if it departs a scheduled time point no more than one (1) minute early and no more than five (5) minutes late. The Insert Agency Name on-time performance objective is 90% or greater. Insert Agency Name continuously monitors on-time performance and system results are published and posted as part of monthly performance reports covering all aspects of operations.

d. Service Availability

JACKSON COUNTY BOARD ON AGING, INC. will distribute transit service so that 90% of all residents in the service area are within a ¼ mile walk of bus service or within a ½ mile walk of rail service.

**Service Policies**

FTA requires fixed route transit providers to develop a policy for service indicators. JACKSON COUNTY BOARD ON AGING, INC. has prepared the following policies for its transit system.

a. Distribution of Transit Amenities

Installation of transit amenities along bus and rail routes are based on the number of passengers boarding at stops and stations along those routes.

b. Vehicle Assignment

Vehicles will be assigned to the South, North, and East depots such that the average age of the fleet serving each depot does not exceed "x" years. Low-floor buses are deployed on frequent service and other high-ridership lines, so these buses carry a higher share of ridership than their numerical proportion of the overall bus fleet. Low-floor buses are also equipped with air conditioning and automated stop announcement systems.

Bus assignments take into account the operating characteristics of buses of various lengths, which are matched to the operating characteristics of the route. Local routes with lower ridership may be assigned 30-foot buses rather than the 40-foot buses. Some routes requiring tight turns on narrow streets are operated with 30-foot rather than 40-foot buses.

All MPOs must meet the following requirements if the agency is included in the MPO constituency.

MPO Requirements (Ref: FTA Circular 4702.1B Chapter VI)	Status
1) Does the plan contain a demographic profile of the metropolitan area that includes identification of the locations of minority populations in the aggregate?	<input type="checkbox"/> Y <input type="checkbox"/> N
2) A description of the procedures by which the mobility needs of minority populations are identified and considered within the planning process?	<input type="checkbox"/> Y <input type="checkbox"/> N
3) Demographic maps that overlay the percent minority and non-minority populations as identified by Census or American Community Survey (ACS) data, at the Census tract or block group level, and charts that analyze the impacts of the distribution of State and Federal funds in the aggregate for public transportation purposes, including federal funds managed by the MPO as a designated recipient?	<input type="checkbox"/> Y <input type="checkbox"/> N
4) Analysis of disparate impacts on the basis of race, color, or national origin, and, if so, determines whether there is a substantial legitimate justification for the policy that resulted in the disparate impacts, and if there are alternatives that could be employed that would have a less discriminatory impact.	<input type="checkbox"/> Y <input type="checkbox"/> N
Comments:	

# “I Speak” Language Identification Card

**Note:** For additional languages visit the US Census Bureau website <http://www.lep.gov/ISpeakCards2004.pdf>

Mark this Box if you speak...	Language Identification Chart	Language
	Mark this box if you read or speak English	English
	Marque esta casilla si lee o habla español	Spanish
	Kos lub voj no yog koj paub twm thiab hais lus Hmoob	Hmong
	如果说中国在方框内打勾	Chinese
	Xin ñaùnh daáu vaøo oâ naøy neáu quyù vò bieát ñoïc vaø noùi ñöôïc Vieät Ngöô.	Vietnamese
	당신이한국어말할경우이 상자를표시	Korean
	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	Tagalog
	Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen	German
	Отметить этот флажок, если вы говорите по-русски	Russian
	Означите ову кућицу ако говорите српски	Serbian
	आप हिंदी बोलते हैं तो इस बक्से को चिह्नित करें	Hindi
	پر نشان لگائیں تو اس باکس بولتے ہیں اردو اگر آپ	Urdu