

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

B.G. Transit

February 21, 2023

(Plan expires 3 years from date approved by the board)

Title VI Plan Table of Contents

The B.G. Transit Title VI plan includes the following elements:

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Section 1: Title VI Plan Approval & Compliance Requirements

Title VI Plan
Adopted on: May 1, 2023

Adopted by: Bowling Green City Council

Signature(s): Martha J Woelke

Approval:

Reviewed by Jessie Schmitzer, ODOT Compliance Officer, 1/10/2023

Approved by Transit Advisory Committee 2/21/2023

APPROVED BY BOWLING GREEN CITY COUNCIL 5/1/2023

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.

B.G. Transit will remain in compliance with this requirement by annual submission of certifications and assurances as required by NHDOT.

The date of last submission of these certifications and assurances (at the time of this Plan's approval) is: May 6, 2022

Title VI Plan Revision Log

Date Month/day/year	Section Revised	Summary of Revisions
2/21/2023	Entire Policy	Updated to ODOT's new recommended policy format. No substantive changes.

Section 2: Title VI Policy Statement

Policy Statement

B.G. Transit, 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. B.G. Transit 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

B.G. Transit's Notice to the Public is as follows:

Notifying the Public of Rights Under Title VI

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 civil rights program, the procedures to file a complaint, or to file a complaint, please contact City of Bowling Green Community Development Administrator (Title VI Officer for B.G. Transit) at 419-354-6220, TTY 800-750-0750, email communitydevelopment@bgohio.org; or visit our administrative office at 305 North Main Street, Bowling Green OH 43402. For more information, visit www.bgohio.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, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

- If information is needed in another language, contact (419) 354-6203.

City of Bowling Green (B.G. Transit) Notice to the Public is posted in the public areas of the office and inside the transit vehicles.

On City of Bowling Green website (B.G. Transit page): www.bgohio.org

First Floor (where B.G. Transit ID Cards are issued), City of Bowling Green Administrative Services Building, 305 N Main Street, Bowling Green, OH 43402

On all seven B.G. Transit vehicles

Section 4: Title VI Complaint Procedure

City of Bowling Green (B.G. Transit) Title VI Complaint Procedure is made available in the following locations:

- Agency website: www.bgohio.org (on B.G. Transit page)
 - 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 B.G. Transit 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 City of Bowling Green (B.G. Transit) 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 or the latest instance of the conduct.

Once the complaint is received, City of Bowling Green (B.G. Transit) 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.

City of Bowling Green (B.G. Transit) has 45 days to investigate the complaint. If more information is needed to resolve the case, City of Bowling Green (B.G. Transit) 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 15 business days, City of Bowling Green (B.G. Transit) 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 15 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, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

If information is needed in another language, then contact (419) 354-6203.

Section 5: Title VI Complaint Form

City of Bowling Green (B.G. Transit) Title VI Complaint Procedure is made available in the following locations:

- Agency website, if available: www.bgohio.org (B.G. Transit section)
- Hard copy in the central office
- Agency Title VI Plan

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Email Address:				
Accessible Requirements?	Format	Large Print		Audio Tape
		TDD		Other
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 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
Section III:				
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.				

Section IV				
Have you previously filed a Title VI complaint with this agency?			Yes	No
Section V				
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.	
Name:	
Title:	
Agency:	
Address:	
Telephone:	
Section VI	
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 419-354-6203.

Please submit this form to:

City of Bowling Green (B.G. Transit)
Attn. Community Development Administrator
305 N. Main St. Bowling Green OH 43402
419-354-6220
Communitydevelopment@bgohio.org

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

City of Bowling Green (B.G. Transit) maintains a list or log of all Title VI investigations, complaints and lawsuits, pertaining to its transit-related activities.

Check One:

 x There have been no investigations, complaint and/or lawsuits filed against us since the last plan submission.

 There have been investigations, complaints and/or lawsuits filed against us. *See list below. Attach additional information as needed.*

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations				
1.				
2.				
Lawsuits				
1.				
2.				
Complaints				
1.				
2.				

Section 7: Public Participation Plan

Strategies and Desired Outcomes

To promote inclusive public participation, City of Bowling Green (B.G. Transit) 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

B.G. Transit will utilize a variety of mediums to reach the public and ensure greater participation. Some of the mechanisms that may be used include:

- Print – newspapers, newsletters, press releases, written articles provided for local publications, etc.
- Website-The City of Bowling Green’s main 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.
- 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 and Email to Community Partners.
- Public Information Sessions (e.g. City Council meetings where transit-related legislation is sought).
- Public Hearings.
- Legal Notices.

The following activities are outreach efforts made since the last Title VI Program submission to the Ohio Department of Transportation:

- 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 Country 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 (Fall 2022).
- 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)
- 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 annual Limited English Proficiency Four-Factor Analysis (Finalized February 2023);
- Developed and adopted an updated Limited English Proficiency Plan (February 2023) which aligns with the most recent Limited English Proficiency Four-Factor Analysis (February 2023);
- Conducted review and amendments of Public Participation Plan for use with B.G. Transit (February 2023).
- Implemented free Community Immunity rides for all transit passengers in response to COVID-19 and provided free rides for all during the period of 12/5/2022-12/24/22.
- 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 (following ODOT timetable) a 5311 Rural Public Transit grant application for financial assistance to ODOT for 2024.
- 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 on May 6, 2022.

Section 8: Language Assistance Plan

Plan Components

As a recipient of federal US DOT funding, City of Bowling Green (B.G. Transit) 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.

City of Bowling Green (B.G. Transit)'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, City of Bowling Green (B.G. Transit) 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, City of Bowling Green (B.G. Transit) 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 B.G. Transit's staff comes into contact with LEP persons. Examples of contact could include:

- (a) Purchase of rides through websites, and over the phone;

- (b) Participation in public meetings;
- (c) Customer service interactions;
- (d) Ridership surveys;
- (e) 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.

From the 2021 ACS data, of the 30,717 residents in B.G. Transit’s service area (29,433 above age 5), 590 residents describe themselves as speaking English less than “very well”.

People of Asian and Pacific Islander descent are the primary LEP persons likely to utilize BG Transit services. For B.G. Transit service area, the latest U.S. Census Bureau data shows that among the area’s population 1.08% speak English “less than very well.” **For these groups** who speak English “less than very well”, 65.4% speak Asian and Pacific Island Languages.

Bowling Green City (43402 zip code) – Languages Spoken at Home

	Total Number	Percent of Population	Total Population of City
Speak Language other than English	1018	3.46%	29,443
Speak English Less than “Very Well”	318	1.08%	29,443
Spanish	285	.97%	29,443
Other Indo-European Languages	346	.50%	29,443
Asian and Pacific Island Languages	280	.95%	29,443
Other Languages	107	.36%	29,443

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

B.G. Transit assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. B.G. Transit provides approximately 29,800 passenger trips per year. They have tracked a total of seven regular transit users with English as their second language. Spanish is the primary language of 5, with 2 speaking Arabic. All of these riders utilize the system independently, without the need of a language interpreter. Since August 2014, Interpreters accompanying LEP passengers may ride the B.G. Transit free of cost (as a personal care attendant does). 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 B.G. Transit’s programs are important; however, those related to safety, public transit, nondiscrimination and public involvement are among the most important. B.G. Transit 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, B.G. Transit will strive to provide alternative but meaningful accessibility, including allowing interpreters accompanying LEP passengers to ride free of cost. Moreover, B.G. Transit 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 other languages upon request. The City of Bowling Green/B.G. Transit has relationships with interpreters at BGSU’s Multicultural Affairs office and in the community to assist with translation services.

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

B.G. Transit makes every effort to make its programs, services, and activities, accessible to LEP individuals. B.G. Transit 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

B.G. Transit 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) B.G. Transit 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.
- e) A list of web-based translation services can be provided by contracting the Community Development Department of the City.

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 B.G. Transit language assistance measures, B.G. Transit provides the following:

- Title VI Program including the Language Assistance Plan is made available on website, if applicable, and hard copy in central office.
- The City of Bowling Green website where B.G. Transit information is located includes “Google Translator” services.
- 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

B.G. Transit 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 B.G. Transit 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 B.G. Transit's financial resources are sufficient to fund language assistance resources needed.
- Determine whether B.G. Transit has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning B.G. Transit's failure to meet the needs of LEP individuals

Item # 5 - Description of how Employees are Trained to Provide Language Assistance to LEP Persons

The following training will continue to be provided to B.G. Transit staff:

- Information on the B.G. Transit 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.

LEP Policy

B.G. Transit 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 BGSU (Office of Multicultural Affairs) and La Conexion to obtain translators. The agency will also utilize web-based translator programs if available.

If you need help with English, please call 419-354-6203.

"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 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

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

Body	Caucasian	Hispanic	African American	Asian American	Native American	Two or More Races
City of Bowling Green (43402 zip code)	83.1%	7.1%	5.5%	2.4%	0.3%	6.7%
Transit Advisory Committee	100% (8)	12.5% (1)	0	0	0	0

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 Insert Agency Name will make every effort to encourage minority participation on the boards. Detail any further efforts below.

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. 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.

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: **Black & White Transportation, LLC**

City of Bowling Green monitors subrecipients using the following process:

1. City of Bowling Green uses the following process for ensuring all subrecipients are complying with the general reporting requirements of FTA Circular 4702.1B:
Annual monitoring via checklist of site, vehicles, required postings, training of drivers and staff. All vehicles have required postings. All complaints are handled through the City of Bowling Green's processes.
2. City of Bowling Green collects Title VI programs from the subrecipients listed above and reviews programs for compliance by monitoring of vehicles with required posted documents, gathering and monitoring any complaints, interactions with staff and management of Black & White Transportation LLC.

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, the agency has not built a facility.

Yes, the agency 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.

B.G. Transit:

is a fixed route transit provider is **not** a fixed route transit provider