BEFORE THE BOARD OF COUNTY COMMISSIONERS
OF LANCASTER COUNTY, NEBRASKA

IN THE ADOPTING THE LANCASTER COUNTY, NEBRASKA TITLE VI PLAN FOR THE LANCASTER COUNTY PUBLIC RURAL TRANSIT PROGRAM	))))	RESOLUTION NO. R-15-0028

WHEREAS, there are federal funds available under Section 5311 of the Federal Transit Act and for the Nebraska Public Transportation Assistance Program; and

WHEREAS, Lancaster County, Nebraska, desires to continue to apply for and participate in said Federal funds to provide public transportation as part of its Public Rural Transit Program; and

WHEREAS, the Nebraska Department of Roads as a recipient of said Federal funds is charged with oversight of the expenditures of said funds; and

WHEREAS, Lancaster County, Nebraska, as a sub-recipient of said Federal funds is charged with the responsibility of expending said funds in accordance with Federal and State law; and

WHEREAS, Lancaster County, Nebraska, as a sub-recipient of said Federal funds is also required to submit a Title VI Program to the Nebraska Department of Roads assuring it will carry out the Lancaster County Public Rural Transit Program in compliance with the Department of Transportation Title VI regulations and guidelines for federal transit administration recipients; and

NOW, THEREFORE, BE IT RESOLVED, by the Board of County Commissioners of Lancaster County, Nebraska, that the Lancaster County, Nebraska Title VI Plan for the Lancaster County Public Rural Transportation Program is adopted as provided in Attachment "A".

DATED this 23 day of June, 2015, at the County-City Building, Lincoln, Lancaster County, Nebraska.

BY THE BOARD OF COUNTY COMMISSIONERS OF LANCASTER COUNTY, NEBRASKA

Todd Wetzel

Deb Schorr

Bernie Heier

Bill Avery

Larry Hudkins

APPROVED AS TO FORM
this 23 day of
June, 2015.

Bill Bohrens
for JOE KELLY
Lancaster County Attorney

Member Avery
Moved the adoption of said resolution
Member Hudkins Seconded the motion

Roll Call: 5 Yes 0 No 0 Abstained 0 Absent

Resolution adopted, signed and billed as adopted
Attest:

Dan Nolte
[Signature of City or County Clerk or Corporate Secretary]

ATTACHMENT "A"

LANCASTER COUNTY, NEBRASKA

Title VI Plan for Lancaster County Public Rural Transit Program

June ___, 2015

Lancaster County, Nebraska Title VI Plan

I. Policy Statement, Authorities and Citations

A. Policy of Nondiscrimination

Lancaster County, Nebraska, operates a Public Rural Transit Program, serving the residents of Lancaster, Cass, Gage, and Saunders counties in Nebraska, through an Agreement with Aging Partners (formerly Lincoln Area Agency on Aging). Lancaster County assures that no person shall on the grounds of race, color, national origin, age, disability/handicap or sex, as provided by Title VI of the Civil Rights Act of 1964, and the Civil Rights Restoration Act of 1987 (P.L. 100.259) be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal financial assistance. Lancaster County is also committed to ensuring that no person, on the basis of race, color, or national origin, shall be excluded from participation in or subjected to discrimination under its programs or services, or be denied the benefits of the level and quality of transit services provided by the LPA's employees, affiliates, and contractors.

The Public Rural Transit Program receives federal funding through the Nebraska Department of Roads (hereinafter referred to as "NDOR") Transit Section. NDOR administers the Public Rural Transit Program's Federal Transit Administration (hereinafter referred to as "FTA") transit service funding and provides all Title VI program oversight for the Public Rural Transit Program. This Title VI Plan has been developed to address FTA's Title VI requirements and oversight responsibilities. This Plan follows the guidelines set forth in FTA Circular 4702.1B.

The Deputy Chief Administrative Officer of the Lancaster County Board of Commissioners, in cooperation with Aging Partners, is responsible for initiating and monitoring Title VI activities that relate to the Public Rural Transit Program, preparing reports and other responsibilities as required by 23 Code of Federal Regulation(CFR) 200 and 49 Code of Federal Regulation 21.

B. Authorities

Title VI of the 1964 Civil Rights Act provides that no person in the United States shall on the grounds of race, color, national origin, or sex be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal financial assistance.

C. Authorizing Legislation

Most Federal transit laws are codified at title 49 U.S.C. Chapter 53. Authorizing legislation is substantive legislation enacted by Congress that establishes or continues the operation of a Federal program or agency. FTA's most recent authorizing legislation is entitled *Moving Ahead for Progress in the 21st Century (MAP-21) Act*, Public Law 112-141,signed into law on July 6, 2012, and effective as of October 1, 2012.

II. Organization, Staffing and Structure

A. Organizational Chart – Reporting Relationship

Pursuant to Neb. Rev. Stat. §23-103, the powers of Lancaster County, Nebraska as a body corporate or politic, shall be exercised by the Board of County Commissioners of Lancaster County, Nebraska.

The Deputy Chief Administrative Officer of the Lancaster County Board of Commissioners reports directly to the Chief Administrative Officer of the Lancaster County Board of Commissioners. However, the Deputy Chief Administrative Officer of the Lancaster County Board of Commissioners shall have an indirect reporting relationship and access to the Board of County Commissioners of Lancaster County.

B. Staffing and Structure

Local Public Agency Governing Body

The Board of Commissioners of Lancaster County, comprised of five (5) elected members, is authorized to ensure compliance with provisions of Lancaster County's policy of non-discrimination and with the law, including the requirements of 23 CFR Part 200 and 49 CFR Part 21. Lancaster County's grants

compliance function and Title VI coordination shall be performed under the authority of the Board of Commissioners of Lancaster County.

Title VI Coordinator
The Deputy Chief Administrative Officer of the Lancaster County Board of Commissioners, in cooperation with Lincoln Area Agency on Aging, shall perform the duties of the Title VI Coordinator and ensure implementation of Lancaster County's Title VI Federally Funded Transportation Program. The Deputy Chief Administrative Officer of the Lancaster County Board of Commissioners reports directly to the Chief Administrative Officer of the Lancaster County Board of Commissioners. However, the Deputy Chief Administrative Officer of the Lancaster County Board of Commissioners shall have an indirect reporting relationship and access to the Board of County Commissioners of Lancaster County, Nebraska.

C. How to Contact Lancaster County, FTA, and NDOR
For more information regarding Lancaster County's Title VI Program, please contact the agency at:

Lancaster County Board of Commissioners
Attn: Deputy Chief Administrative Officer
555 South 10th Street
Lincoln, NE 68508
(402)441-7447

The Nebraska Department of Roads can be contacted at:

Nebraska Department of Roads
Attn: Title VI Transit Manager
1500 Hwy. 2
Lincoln, NE 68502
(402)-479-4694
Kari.ruse@nebraska.gov

FTA Headquarters can be contacted at:

Federal Transit Administration
Office of Communications and Congressional Affairs
1200 New Jersey Avenue SE
East Building, 5th Floor-TCR
Washington, D.C. 20590
Phone: (202)-366-4033; Fax: (202)-366-3472

III. General Requirements and Guidelines

A. Requirement to Provide Title VI Assurances
In accordance with 49 CFR Section 21.7(a), every application for FTA financial assistance must be accompanied by an assurance that the applicant will carry out the program in compliance with DOT Title VI regulations. This requirement shall be fulfilled when the applicant/recipient submits its annual certifications and assurances to FTA.

Lancaster County will annually submit its Certifications and Assurances to the NDOR. NDOR will collect Lancaster County's Title Assurances prior to passing through FTA funds.

B. Requirement to Prepare and Submit a Title VI Program
FTA requires that all direct and primary recipients document their compliance with DOT's Title VI regulations by submitting a Title VI Program to their FTA Regional Civil Rights Officer once every three years, or as otherwise directed by FTA. For all recipients (including subrecipients), the Title VI Program must be approved by the recipient's board of directors or appropriate governing entity or official(s)

responsible for policy decisions prior to submission to FTA. Subrecipients shall submit Title VI Programs to the primary recipient from whom they receive funding in order to assist the primary recipient in its compliance efforts.

Lancaster County will submit its Title VI Program relating to the Public Rural Transit Program to the NDOR for review and approval. Prior to such submission, the Lancaster County Board of Commissioners will approve this Title VI Program by Resolution. Documentation of such approval will be submitted with Lancaster County's Title VI Program. The effective date of the Program will be the date the resolution is signed by the Lancaster County Board of Commissioners.

C. Requirement to Notify Beneficiaries of Protection under Title VI

Title 49 CFR Section 21.9(d) requires recipients to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI. At a minimum, recipients shall disseminate this information to the public by posting a Title VI notice on the agency's website and in public areas of the agency's office(s), including the reception desk, meeting rooms, etc. Recipients should also post Title VI notices at stations or stops, and/or on transit vehicles.

A copy of Lancaster County's Title VI Notice to the Public is attached hereto and incorporated as Appendix A. The notice is posted on the Lancaster County Board of Commissioners website at www.lancaster.ne.gov/commiss/policies/index.htm, and on the Aging Partners website at www.lincoln.ne.gov/city/mayor/aging/transportation.htm.

D. Requirement to Develop Title VI Complaint Procedures and Complaint Form

All recipients shall develop procedures for investigating and tracking Title VI complaints filed against them, and shall make their procedures for filing a complaint available to members of the public. Recipients must also develop a Title VI complaint form, and the form and procedure for filing a complaint shall be available on the recipient's website. Subrecipients may adopt the Title VI complaint investigation and tracking procedures and complaint form developed by the primary recipient.

Lancaster County has adopted the NDOR's procedures and forms for investigating and tracking Title VI complaints of discrimination. A copy of the Complaint Procedures is attached hereto and incorporated as Appendix B. A copy of the Complaint Procedures is also posted on the Lancaster County Board of Commissioners website at www.lancaster.ne.gov/commiss/policies/index.htm, and on the Aging Partners website at www.lincoln.ne.gov/city/mayor/aging/transportation.htm. A copy of the Complaint Procedures, as described in detail below, is available for distribution to the public in English, Spanish, Chinese, and Vietnamese upon request.

Complaint Procedures

Lancaster County, forwards all Title VI complaints of discrimination, arising out of the operation of the Public Rural Transit Program, to the Nebraska Department of Roads Rail and Public Transit section for review. Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by Lancaster County may file a complaint by requesting and completing the agency's Title VI Complaint Form. Only complaints received no more than 180 days following the alleged incident will be subject to investigation.

All Title VI and related statute complaints are considered formal—there is no informal process. Complaints must be made in writing and signed by the complainant on the form provided. Complaints received by telephone will be placed in writing and provided to the complainant for confirmation or revision and signing prior to processing.

Complaints may be filed by the affected individual or a representative of that individual. Complaints must include the complainant's name, address, and telephone number, and should specify all incidences and circumstances of the alleged discrimination. Allegations must be based on issues involving race, color, or national origin. Complaints can be submitted using the following contact information:

Lancaster County Board of Commissioners
Attn: Deputy Chief Administrative Officer
555 South 10th Street
Lincoln, NE 68508
(402)441-4774

Complainants who do not wish to file with Lancaster County may contact the Nebraska Department of Roads to receive assistance filing a complaint. NDOR can also assist individuals in submitting a Title VI Complaint in a language other than English. NDOR can be contacted using the following information:

Nebraska Department of Roads
Attn: Title VI Transit Manager
1500 Hwy. 2
Lincoln, NE 68502
(402)-479-4694
kari.ruse@nebraska.gov

Complaints may also be filed with the Federal Transit Administration at the following address:

Federal Transit Administration
Office of Civil Rights
Attn: Title VI Program Coordinator
East Building, 5th Floor-TCR
1200 New Jersey Ave., SE
Washington, D.C. 20590

If a complaint is received by Lancaster County, it will submit the complaint to the Nebraska Department of Roads (NDOR) for review. Upon receipt of the complaint, the NDOR Transit Section will notify the Federal Transit Administration that a complaint has been filed. The NDOR Transit Manager or other investigator will contact the complainant to:

- Acknowledge receipt of the complaint by the investigator.
- Confirm the complainant received adequate assistance to file the complaint
- Confirm that the complainant wishes to proceed with the complaint.
- Confirm the existence of allegations that require investigation and/or resolution.
- Gather additional facts and further clarify the complaint.

The complainant will be notified in writing that the complaint was received and will be reviewed by the NDOR Transit Section and FTA Region VII, with the involvement of Lancaster County. If the complaint is determined to have validity, it will be investigated. As part of the review, the investigator will, at minimum:

- Gather relevant documentation from the complainant that was not included in the complaint, such as forms, memos, letters, and photographs;
- Maintain a log of all activities associated with the complaint;
- Complete an investigative report containing information, findings, photos, and recommendations for corrective action, to be submitted to FTA.

A copy of the complaint, together with a copy of NDOR's investigative report, shall be forwarded to the FTA Region VII Office in Kansas City, MO within 60 days of the date at which the complaint was received by NDOR.

A decision by NDOR to dismiss a complaint can be made for the following reasons:

- The complaint was not filed within 180 days.
- The complaint is not covered by the Title VI statutes for which NDOR is responsible.

- The complaint does not allege any harm covered under the statutes for which NDOR is responsible.
- The complainant requests the withdrawal of the complaint.
- The complainant fails to respond to repeated, documented requests for additional information needed to process the complaint.
- The complainant cannot be located after documented reasonable attempts.

In the event of a complaint or lawsuit being filed within the transit program, a log will be maintained which is to include the following information:

- The date the complaint/lawsuit was filed.
- A summary of the allegation(s).
- The status of the investigation.
- The actions taken by the recipient/subrecipient in response to the complaint/lawsuit and investigation.
- Documentation to be retained includes the complaint form and a summary of findings.

After the investigator reviews the complaint, she/he will issue either a closer letter or a letter of finding to the complainant. If the complainant wished to appeal the decision, she/he has 30 days following the closure letter or LOF to do so.

For additional questions regarding Lancaster County's complaint procedure, individuals may contact Lancaster County at the contact information provided above. For more information on NDOR's Title VI complaint procedure, individuals may contact NDOR at the address provided.

E. Requirement to Record and Report Title VI Complaints, Investigations, and Lawsuits
In order to comply with the reporting requirements of 49 CFR Section 21.9(b), FTA requires all recipients to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations conducted by entities other than FTA; lawsuits; and complaints naming the recipient. This list shall include the date that the investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to, the investigation, lawsuit, or complaint.

At this time, Lancaster County has not received any Title VI complaints of discrimination relating to or arising out of the Public Rural Transit Program. In the event a complaint or lawsuit is filed, Lancaster County will maintain a list of all investigations, lawsuits, and/or complaints naming the agency, in accordance with the guidelines specified by FTA C 4702.1B. A copy of the form that will be used to track such complaints is attached hereto and incorporated by this reference as Appendix C. Lancaster County will maintain permanent records of all complaint-related documents, and report all Title VI complaints of discrimination to the NDOR.

F. Plan to Promote Inclusive Public Participation
Lancaster County's public involvement strategy, in cooperation with Aging Partners, is intended to promote awareness and provide opportunity for the public to participate in the agency's transportation decision-making process surrounding projects, fare and/or service changes, and applications for Federal operating assistance. This process allows for:

- Ensuring the timely dissemination of information to the public
- Considering the input and encouraging the participation of underserved groups in the agency's transportation decision-making processes.
- Granting timely public notice and an adequate review period through this process.
- Facilitating adequate public review of major project revisions.
- Granting opportunity for the review of proposed and final plans.
- Encouraging and documenting public comment.

For these purposes, Lancaster County will announce and hold a public hearing in the event of a fare increase, major change in service, or in the event of a capital construction project. Additionally, Lancaster County will provide adequate public notice in the event of a vehicle purchase for the Rural Transit Program or upon the submission of an application for State or Federal operating assistance funds with no major service changes or fare increases.

For the purpose of definition, a major change or reduction in service shall include a reduction in total system vehicle hours of 10% or more, the elimination of service in an area with a population of 2,000 or more, the elimination of service on one or more days of the week, or a change in the type of transit service in an area with a population of 2,000 or more. A fare increase shall include an increase in single ride fare for any transit service including other fare categories, or a decrease in the discount(s) offered for fare categories.

Public hearings will be advertised in a newspaper of general circulation in the geographic area the project will serve at least 14-21 calendar days in advance of the public hearing, and again no later than 5-12 calendar days in advance of the public hearing. Notice of hearings shall include a concise description of the proposed project, and will advertise the availability of translated copies of the hearing notice and/or other publically-released meeting documents.

To encourage the attendance and participation of LEP persons in the public hearing process, notice of upcoming public hearings will be posted in Spanish, Chinese, and Vietnamese at one or more public locations throughout the agency service area at least 14-21 calendar days in advance of the public hearing (see the Four Factor Analysis in the current document for information on why these LEP groups were selected for representation); these locations will be selected with regard to their general accessibility by LEP persons.

The Lancaster County Clerk's Office will record and prepare formal minutes of the public hearing. These minutes will be distributed to the public upon request. Persons of limited English proficiency may request a translated copy of these minutes, as well as of other publically-released meeting documents (e.g., announcements, surveys, comment cards, etc.), in Spanish, Vietnamese, and/or Chinese, and these documents will be translated and distributed to the requesting party. The availability of translated meeting minutes and public documents will be advertised on the County's public hearing notice.
Written or verbal comments from the public will be accepted during and for at least 10 days following the public hearing. These comments will be reviewed as part of Lancaster County's decision-making process surrounding transportation projects.

Summary of Past Outreach Efforts
Aging Partners, as the facilitator of the Rural Transit Program, regularly performs community outreach to ensure equal access to its programs and services for minority and LEP persons. Currently, the Lancaster County Rural Transit Program offers rides based on a contribution fare, which allows the public to access transit services without regard to their ability to pay. This has allowed the Program to transport a greater percentage of low-income, minority, and LEP persons. Aging Partners also advertises in a number of publications, including the Lincoln Journal Star, a quarterly Living Well newsletter, each of the agency's six Senior Centers, the local Area Office on Aging, and at local Federation of Human Services meetings.

F. Providing Meaningful Access to LEP Persons
Recipients are required to take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. While designed to be a flexible and fact-dependent standard, the starting point is an individualized assessment that balances the following four factors: (1) the number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee; (2) the frequency with which LEP individuals come into contact with the program; (3) the nature and importance of the program, activity, or service provided by the program to people's lives; and (4) the resources available to the grantee/recipient and costs. As indicated above, the intent of this guidance is to suggest a balance that ensures meaningful access by LEP persons to critical services while not imposing undue burdens on the LPA.

Four Factor Analysis Results Summary
The number and proportion of Spanish, Vietnamese, and Chinese-speaking LEP persons within the Lancaster County Public Rural Transit service area is significant, comprising greater than 1,000 persons or 5% of the total service area population over five years of age. This number reaches the Safe Harbor Threshold of 1,000 or more LEP persons or 5% of the total service area population. Based on these results, the agency should be prepared to take reasonable steps to provide language assistance for LEP persons within these language groups residing within its service area.

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient
The Lancaster County Public Transit Program is a public transportation provider servicing the residents of Lancaster, Gage, and Saunders County, Nebraska. To determine the number and proportion of LEP persons residing within the agency's service area, 2008-2012 American Community Survey Data representing languages spoken at home for persons over five years of age was combined and analyzed at the county level. This analysis resulted in the following service area profile. In this analysis, "LEP" was defined as persons who speak English "less than very well" according to the American Community Survey. LEP can also be defined as a person who has a limited ability to speak, read, or write the English language.

Lancaster County Public Rural Transit (LCPRT) service area LEP profile

- The total number of persons over five years of age in LCPRT's combined service area is 330,014.
- Of the total population over five years of age, 298,970 persons, or, approximately 90.5% of the population, speak English only.
- Three (3) non-English language groups in the combined service area contain at least 1,000 LEP persons. These language groups are Spanish or Spanish Creole, Vietnamese, and Chinese, with 4,340; 2,513; and 1,047 LEP persons in each language group, respectively.
- Zero (0) non-English language groups contained LEP persons equaling 5% or more of the total population over five years of age of the combined service area.
- The largest non-English language group within the LCPRT service area is Spanish or Spanish Creole. This language group contains 11,929 persons, representing approximately 3.6% of the total service area population, while the number of LEP persons within this language group is 4,340.
- Other non-English groups contained a comparatively low number and proportion of LEP persons, or did not meet or surpass the Safe Harbor Threshold of 1,000 or more LEP persons or 5% or more of the total service area population. Language groups that neared this threshold and should be re-examined as part of the agency's next Title VI program submission include Arabic, at 954 LEP persons or 2.8% of the total service area population.

Service Area Profile Conclusions
The total number and proportion of LEP persons residing within the LCPRT service area is significant, reaching the Safe Harbor Provision threshold of 1,000 LEP persons or 5% or more LEP persons for the following three language groups: Spanish, Chinese, and Vietnamese. Based on these findings, the agency should be prepared to take reasonable steps to ensure equal access for LEP persons from these language groups who may choose to access its programs and services, as detailed in the following Language Assistance Plan.

Factor 1a: How LEP persons interact with the recipient's agency
Aging Partners, who operates the Lancaster County Public Rural Transport Program, report some but

limited contact with LEP persons during its rural transit operations, particularly with persons who speak Spanish or Vietnamese. The agency also occasionally comes into contact with LEP persons through local partnerships and activities with community-based organizations including the Malone Community Center, Asian Cultural Center, and Downtown Center, and the New Americans Task Force and American Federation for Human Services.

Factor 1b: The literacy skills of LEP persons in their native languages, in order to determine whether the translation of written documents will be an effective practice
No data could be obtained regarding the native language literacy of LEP persons within the LCPRT services area, nor does the agency maintain such data at this time. Such data will be utilized in the instance that it becomes available. However, due to the language assistance resources made available by the agency to LEP persons, it is not estimated that barriers to service due to native language literacy would prevent LEP persons from accessing the agency's programs or services at this time.

Factor 1c: Whether LEP persons are underserved by the recipient due to language barriers
LCPRT Program works with a number of organizations, as discussed in Factor 1 above, to ensure equal access to its programs and services for minority, LEP, and low-income persons, and to discover areas where clientele could potentially be underserved. It is not estimated at this time that language barriers prevent LEP persons from accessing the agency's programs and services.

Factor 2: The frequency with which LEP persons come into contact with the program
Aging Partners' personnel report some, but limited, interaction with LEP persons while administering its programs and services.

Factor 3: The Nature and Importance of the Program, Activity, or Service in People's Lives
The Lancaster County Rural Transit Program serves clientele ranging from the elderly and persons with disabilities to low-income, minority, and LEP persons. The program is a point of access for many members of the community to critical services such as medical care and shopping. It is estimated that the program's services are invaluable to many of the persons served within its service area.

Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach
Lancaster County has access to Title VI resources through the Nebraska Department of Roads. These resources are provided to Lancaster County at either no-cost, or at a 90% cost-reimbursed rate. No-cost resources include Spanish, Vietnamese, and Chinese document translation, including Title VI documents (e.g., Title VI Notice to the Public, Title VI Complaint form, etc.) for Lancaster County; and general Title VI assistance and oversight. Cost-reimbursed resources include the use of LanguageLine Solutions as a competent oral interpreter.

Lancaster County Public Rural Transit Program Language Assistance Plan
Based on the findings of the Four Factor Analysis presented above, Lancaster County is prepared to take reasonable steps to provide language assistance for LEP persons who may come into contact with the program, with particular emphasis on the Safe Harbor LEP language groups identified above: Spanish, Chinese, and Vietnamese.

Plan to use a Competent Interpreter
On an as-needed basis, Aging Partners' personnel will use LanguageLine Solutions as a competent interpreter to enable communication between agency staff and persons of limited English proficiency. LanguageLine is an over-the-phone professional interpreting service that can provide assistance in over 200 spoken languages. This service will enable Aging Partners' personnel to communicate effectively with LEP persons who contact the agency either in-person or over the phone. The personnel member must simply dial a toll-free number and (if not already identified) prompt the LEP speaker to identify their spoken language. The corresponding LanguageLine interpreter can then relay verbal messages between the staff person and LEP individual. Additional information on LanguageLine can be found by visiting the company website at http://www.languageline.com/.

As a safeguard, U.S. Census Bureau "I Speak" cards will be located at Aging Partners' main office to enable LEP persons to quickly identify their spoken language when it cannot be readily identified by the staff member. These cards will be distributed by agency personnel in the event they are deemed necessary.

Plan to Provide Document Translation
Lancaster County's Title VI Notice to the Public, Discrimination Complaint Form, and Complaint Procedures Form are available to the public in English, Spanish, Chinese, and Vietnamese; likewise, additional vital documents will be made available in these LEP languages as deemed necessary. In the event of a public hearing, publically-distributed meeting documents, including meeting minutes, will be also provided in said languages upon request from the public. The agency will take reasonable steps to provide translations of additional documents in the event they are requested.

Plan to Provide Translated Scheduling, Route, and Fare Information
Lancaster County, in cooperation with Aging Partners. will make available translated information on its hours of service, fares, contact information, etc., in print and/or electronic form. This information will be posted in print in one or more public locations throughout the agency service area selected with regard to their general accessibility to LEP persons (e.g., post office, gas stations, grocery stores, etc.), and/or within the agency's service vehicles.

Monitoring, Evaluating, and Updating the LEP Plan
Lancaster County will update the current Language Assistance Plan as required. At minimum, the plan will be reviewed and updated every two years. Updates may include the following:

- The number of documented LEP person contacts encountered since the last update. Description of how the needs of LEP persons have been addressed.
- Determination of the current LEP population within the agency service area.
- Determination of whether the need for language assistance has changed.
- Determination of whether local language assistance has been effective and sufficient at meeting needs.
- Determination of whether the available outreach resources are sufficient to supply necessary language assistance.
- Determination of whether complaints have been received concerning the LCPRT Program's failure to meet the needs of LEP persons.

Employee Training
Employees of Aging Partners who staff the LCPRT Program should be fully aware of and understand the importance of Title VI, as well as the current Language Assistance Plan, so they can reinforce its importance and ensure its agency-wide implementation. Aging Partners' personnel are required to review the current Title VI Program document and sign a written statement that they have done so.

In addition, necessary personnel will be familiar with the use of the Language Line interpreting service and Bureau "I Speak" cards to facilitate potential contact with LEP persons.

LCPRT Program personnel will also be familiar with Lancaster County's procedures for handling a potential Title VI complaint.

G. Minority Representation on Planning and Advisory Bodies

Title 49 CFR Section 21.5(b)(1)(vii) states that a recipient may not, on the grounds of race, color, or national origin, "deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program." Recipients that have transit-related, nonelected 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.

Lancaster County does not currently have a nonelected transit board or advisory council; however, in the event that one was established, Lancaster County will include 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.

H. Equity Analysis to Determine Site or Location of Facilities

Title 49 CFR Section 21.9(b)(3) states, "In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this part." Title 49 CFR part 21, Appendix C, Section (3)(iv) provides, "The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin."

Lancaster County has not conducted a project requiring land acquisition in relation to the Public Rural Transit Program or the displacement of persons during the current reporting period. In the event Lancaster County is involved in such a project, it will comply with the requirements set forth in FTA Circular 4702.1B, Chapter III(13)(Determination of Site or Location of Facilities).

IV. Requirements and Guidelines for Fixed Route Transit Providers

Lancaster County, through the Public Rural Transit Program, is not a provider of fixed route public transportation and is therefore exempt from the requirements set forth in FTA Circular 4702.1B, Chapter IV.

Approved on this 23 date of June, 2015.

BY THE BOARD OF COUNTY COMMISSIONERS OF
LANCASTER COUNTY, NEBRASKA

Todd Wilke

Deb Schorr

Larry Hudkins

Bill Avery

Larry Hudkins

Title VI Notice to the Public

Lancaster County Public Rural Transit

Lancaster County Public Rural Transit operates its programs and services without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act. Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI may file a complaint of discrimination by completing and submitting a Title VI Discrimination Complaint Form. This form can be downloaded on the following websites: www.lancaster.ne.gov/commiss/policies/index.htm or www.lincoln.ne.gov/city/mayor/aging/transportation.htm. Additionally, the form can be requested by contacting Aging Partners at 402-441-7070, 1005 "O" Street, Lincoln, Nebraska. An interpreter can be provided to assist persons of limited English proficiency.

To request more information on Aging Partners' Title VI obligations, or to obtain a detailed description of Aging Partners' Title VI discrimination complaint procedures, please contact Aging Partners at 402-441-7070. Additional Title VI information can also be obtained through the Nebraska Department of Roads (NDOR) website (www.transportation.nebraska.gov) or by contacting NDOR using the information provided below. A telephone interpreter can be provided to assist persons of limited English proficiency.

Lancaster County Public Rural Transit ATTN: Deputy Chief Administrative Officer 555 S. 10 Street Lincoln, Nebraska 68508 402-441-7447 *gthorpe@lancaster.ne.gov*	Nebraska Department of Roads ATTN: Title VI Transit Manager 1500 Hwy. 2 Lincoln, Nebraska 68502 402-479-4694 kari.ruse@nebraska.gov	Federal Transit Administration Office of Civil Rights ATTN: Title VI Program Coordinator East Building, 5th Floor TCR 1200 New Jersey Ave., SE Washington, D.C. 20590

Lancaster County Public Rural Transit opera sus programas y servicios sin tomar en cuenta raza, color, u origen nacional de conformidad con el Título VI del Acta de Derechos Civiles. Cualquier persona que cree que ha sido agraviada por cualquier práctica discriminatoria ilegal bajo el Título VI puede presentar una queja de discriminación por completar y enviar un Formulario de Queja de Discriminación de Título VI. Este formulario se puede descargar en el sitio de web del Departamento de Carreteras de Nebraska (NDOR) en www.transportation.nebraska.gov; adicionalmente, se puede solicitar el formulario poniéndose en contacto con la agencia a la dirección proporcionada arriba. Un interprete telefónico está disponible para asistir personas de dominio de Inglés limitado.

Para solicitar mas información sobre las obligaciones de Título VI de la agencia, o para obtener una descripción detallada del procedimiento de Quejas de Discriminación del Título VI, favor contactar la agencia a la dirección proporcionada arriba. También se puede obtener información adicional del Título VI en el sitio de web del Departamento de Carreteras de Nebraska (NDOR) en

www.transportation.nebraska. gov o poniéndose en contacto con NDOR a la dirección proporcionada arriba. Un interprete telefónico está disponible para asistir personas de dominio de Inglés limitado.

Title VI Discrimination Complaint Form

Lancaster County Public Rural Transit

To file a Title VI complaint of discrimination, please complete this Complaint Form in full and submit it within 180 days following the alleged incident using the provided agency contact information. Complaints received after 180 days will not be eligible for investigation. Title VI complaints must involve issues pertaining to race, color, or national origin. Complaint Forms may be submitted by an individual or a representative of that individual. An interpreter can be provided to assist persons of limited English proficiency.

Complaints must be made in writing and contain as much information as possible about the alleged discrimination. If complaints are received by telephone, the information will be documented in writing and provided to the complainant for confirmation or revision and signature prior to processing. The written complaint should include the complainant's name, address, and telephone number, as well as a detailed description of the issues and the name(s) and job title(s) of individuals perceived as parties in the complaint.

After completing this Complaint Form, please return it to the address below:

Lancaster County Public Rural Transit Program
Attn: Deputy Chief Administrative Officer
555 South 10th Street
Lincoln, NE 68508
(402)441-7447

Complainants may also choose to return this form to the Nebraska Department of Roads at the following address:

Nebraska Department of Roads
Attn: Title VI Transit Manager
1500 Hwy 2 Lincoln, NE 68502
(402)-479-4694
kari.ruse@nebraska.gov

This form may also be submitted to the Federal Transit Administration at the following address:

Federal Transit Administration
Office of Civil Rights
Attn: Title VI Program Coordinator
East Building, 5th Floor-TCR
1200 New Jersey Ave., SE
Washington, D.C. 20590

Para obtener una copia de este documento en Español, favor de visitar el sitio de web de la agencia a http://www.transportation.nebraska.gov/rpt/pub-transp.htm#transit. Para asistencia adicional, favor de ponerse en contacto con la agencia o el Departamento de Carreteras de Nebraska al numero telefónico dado anteriormente. Un interprete telefónico está disponible para asistir personas de dominio de Inglés limitado.

Title VI Complaint Procedures

Lancaster County Public Rural Transit

Any person who believes they have been discriminated against on the basis of race, color, or national origin by Lancaster County Public Rural Transit may file a complaint by completing and submitting the Lancaster County Public Rural Transit's Title VI Complaint Form. Complaints must be submitted within 180 days following the alleged incident. Complaints received after 180 days will not be eligible for investigation. An interpreter can be provided to assist persons of limited English proficiency.

All Title VI and related statute complaints are considered formal - there is no informal process. Complaints must be made in writing and signed by the complainant on the Complaint Form provided. If complaints are received by telephone, the information will be documented in writing and provided to the complainant for confirmation by telephone, the information will be documented in writing and provided to the complainant for confirmation or revision and signature prior to processing. Complaints may be filed by the affected individual or by a representative of that individual. Complaints must include the complainant's name, address, and telephone number, and should specify all issues and circumstances of the alleged discrimination. Allegations must be based on issues involving race, color, or national origin. Complaints can be submitted to the agency at the following contact information:

Lancaster County Public Rural Transit
Attn: Deputy Chief Administrative Officer
555 S. 10 Street
Lincoln, NE 68508
(402)441-7447

Complaints may also be filed directly with the Nebraska Department of Roads at:

Nebraska Department of Roads
Attn: Transit Liaison Manager
1500 Hwy. 2
Lincoln, NE 68502
(402)479-4694

Complaints can also be filed directly with the Federal Transit Administration at:

Federal Transit Administration
Attn: Title VI Program Coordinator
East Building, 5th Floor -TCR
1200 New Jersey Ave. SE
Washington, D.C. 20590

Title VI Complaint Tracking Form

Lancaster County Public Rural Transit

Title VI Complaints							
Complainant Name	Date of Incident	Date Filed	Summary of Complaint (include basis of complaint: race, color, or national origin)	Complaint resulted in investigation (Y/N)	Status of complaint: active or closed?	Summary of Findings OR Reason Complaint was not investigated (N/A if active)	Notes

Title VI Lawsuits					
Name of plaintiff	Date of Incident	Date Filed	Status: Active or Closed	Result (N/A if active)	Notes

Submitted by:

Lancaster County Public Rural Transit
555 S. 10 Street
Lincoln, NE 68508
(402) 441-7447