Federal Transit Administration Title VI Program

Version 0126

Access Tusc

Plan Effective Date:

January 28, 2026

Title VI Contact Information

Contact (Position): Founder & CEO
Contact Phone Number: 234-801-8011
Contact Email: jessica@accesstusc.org

Mailing Address: 1458 5th Street NW, New Philadelphia, Ohio 44663
Website: www.accesstusc.org

Language Interpretation Assistance

Interpretation Services Provided By (Company or Service Name): Access Tusc/Bridges to Wellness
For Interpreter Services Individuals Will Call (Phone Number): 234-801-8011

Title VI Plan Table of Contents

The Access Tusc Title VI plan includes the following elements:

Section 1: 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.

Access Tusc will remain in compliance with this requirement by annual submission of certifications and assurances as required by ODOT. This certification is included with the annual grant assurances and certifications attached with the ODOT Grant. It is completed annually.

Section 2: Title VI Policy Statement

Access Tusc, 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. Access Tusc 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

Access Tusc's Notice to the Public can be found in Appendix C. Whenever a Safe Harbor analysis shows a language group exceeding 5% or 1,000 persons, then Access Tusc will translate the notice into that language. According to FTA Circular 4702.1B, transit agencies are required to inform the public of their rights under Title VI by strategically posting a Notice to the Public in high-visibility areas. The Title VI Notice shall be displayed in the following locations at a minimum:

- Agency Website: The notice must be posted on the recipient's website.
- Public Areas of the Office: This includes reception rooms and meeting rooms at the agency's administrative or central office.

Transit Vehicles: It is strongly recommended notices be placed inside all vehicles used in the provision of transit service (e.g., posters, flyers, or comment cards). Access Tusc:

☒ Posts notices inside vehicles.

☐ Does not post notices inside vehicles.

Access Tusc may post notices in locations other than the aforementioned areas, Currently, Access Tusc has:

☒ No other locations.

☐ Additional locations including: Click or tap here to enter text.

Section 4: Title VI Complaint Procedure

An example of the Access Tusc complaint procedure directions can be found in Appendix E. Whenever a Safe Harbor analysis shows a language group exceeding 5% or 1,000 persons, then Access Tusc will translate the compliant procedure into that language.

According to FTA Circular 4702.1B and standard compliance guidelines for subrecipients, the Title VI complaint procedure and form shall be posted in the following minimum locations:

- Agency Website: Both the complaint procedure and the complaint form must be available on the recipient's website.
- Central Administrative Office: A hard copy must be available at the agency's central office.
- Inside the Title VI Plan: The full procedure and form must be included as part of the agency's formal Title VI Program document.

Section 5: Title VI Complaint Form

An example of the Access Tusc complaint form can be found in Appendix F. The complaint form is made available to the public and can be found:

- On the Access Tusc website
- At the agency's central office/administrative office (hard copy made available)
- Within the Title VI Program document (can be found in Appendix F as mentioned)

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

Access Tusc maintains a list or log of all Title VI investigations, complaints, and lawsuits, pertaining to its transit-related activities. This list can be found in Appendix G.

Section 7: Public Participation Plan

Strategies and Desired Outcomes

To promote inclusive public participation, Access Tusc will employ the following strategies, as appropriate:

- ✓ 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 Access Tusc since the last Title VI Program submission are summarized in the table in Appendix H.

Section 8: Language Assistance Plan

Overview

Access Tusc is required to take reasonable steps to ensure meaningful access for Limited-English Proficient (LEP) persons. LEP refers to individuals who speak English "less than very well".

Four-Factor Analysis

To determine the right level of service, complete the following four factors.

Factor 1: Demography (The Number of LEP Persons)

Instructions: Go to data.census.gov. Search for Table **S1601** (Language Spoken at Home) for your specific County. Use the most recent "5-Year Estimates".

Population Group	Number of Persons	Percentage (%)
Total Population (Age 5+)	86,688	100%

Population Group	Number of Persons	Percentage (%)
Total LEP Population (English "less than very well")	520	25%
Largest LEP Language: Other Indo-European languages (e.g., Germanic/European languages)	5289	6.1%
2nd Largest LEP Language: Spanish	2080	2.4%

Factor 2: Frequency of Contact

How often does your staff (drivers, dispatchers, reception) interact with LEP individuals?

☒ Daily

☒ Weekly

☒ Monthly

☐ Rarely (Once or twice a year)

☐ Never

A log of LEP encounters can be found in Appendix I.

Factor 3: Importance of the Service

Access Tusc recognizes that public transit is a vital service. To ensure safety and access, we prioritize the translation of Vital Documents. Vital documents currently translated include: Title VI Notice, Complaint Form, and ADA Information.

Factor 4: Resources and Costs

Select the resources your agency uses to assist LEP persons (check all that apply):

☒ Telephone Interpretation: Provided by service noted on Main Page of plan.

☒ "I Speak" Cards: Carried by drivers and dispatchers to identify languages. Example in Appendix J.

☒ Website Translation: Our website includes a Google Translate or similar widget.

☒ Community Partners: We coordinate with local social service agencies or schools.

Section 9: Minority Representation (Simplified)

Overview

If Access Tusc has a non-elected transit-related planning board, advisory council, or committee, a subrecipient must track the racial breakdown of those members to ensure representation. If the transit board is elected, a subrecipient does not need to track that information. The following table clarifies "elected" versus "non-elected."

If the Board Member is...	Category
Voted for by the citizens of the county/city.	Elected
Appointed by a Mayor or Commissioner.	Non-Elected
Voted in by the existing Non-Profit Board members.	Non-Elected
A volunteer who joined the committee.	Non-Elected

The Access Tusc governing board is:

☐ Elected – the following membership breakdown information is not needed.

☒ Non-Elected – the following membership breakdown must be completed.

Step 1: Membership Breakdown

Instructions: In the first row, enter the population percentages for your service area (found in the same Census Table S1601 used in Section 8). In the second row, enter the actual number of members on your board/committee by race.

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

Group	Caucasian	Hispanic	African American	Asian American	Native American	Two or More Races
Service Area Population %	95.7%	5.1%	1.2%	0.4%	.6%	1.8%
Number of Board Members	10					

Step 2: Efforts to Encourage Participation

☐ Elected Board: Our board is comprised of elected officials and therefore no non-elected committee exists.

If non-elected board members - how does Access Tusc encourage minority participation on its boards? (Check all that apply):

☒ Public Notices: We include "Equal Opportunity" language in all board recruitment advertisements.

☒ Community Outreach: We reach out to local minority-owned businesses or community centers when vacancies occur.

☐ Other Efforts: Click or tap here to enter text.

Appendix A

Proof of Governing Board Adoption of Plan

Jessica Kinsey, Founder and CEO sent out the updated Title VI to Access Tusc Board of Directors on January 29, 2026, for their review and approval. Title VI was approved by the Access Tusc Board of Directors on January 29, 2026.

Access Tusc Board of Directors Roster 2026

Board Member	Board Title	Profession	Employer
Pat Warther, RN	President	Executive Director	Tuscarawas Clinic for the Working Uninsured
Yvette Schupbach	Vice President	Director of Marketing and Admissions	New Dawn Nursing Care and Retirement Center
Mariann Harding, Ph.D, RN, CNE	Secretary	Associate Professor, College of Nursing	Kent State University at Tuscarawas
Sherri Douglas	Treasurer	Vice President of Finance	Freeport Press
Jennifer Gigax, MD, FAAP	Member at Large	Pediatrician at Akron Children's Hospital, Chief of Pediatrics Cleveland Clinic Union Hospital	Akron Children's Hospital and Cleveland Clinic Union Hospital
Jason F. Haupt, Esq.	Member at Large	Shareholder/Director/VP of Firm	Krugliak, Wilkins, Griffiths, and Dougherty Co., L.P.A.
Dr. Stephen A. Minnick	Member at Large	Assistant Dean	Kent State University at Tuscarawas
Mollie Parisi	Member at Large	Special Education Coordinator	Buckeye Career Center
Dr. Lori Kuehne	Member at Large	Family Physician	Community Hospice and Palliative Medicine
Vacancy			

Appendix B

Title VI Plan Revision Log

Date Month/day/year	Action Taken	Authorizing Individual
01/28/2026	Access Tusc has been working to update expiring Title VI policy to make updates and include compliance changes. Access Tusc has adopted a new format provided by the Ohio Department of Transportation (ODOT) for streamlined changes and updates.	Jessica Kinsey, Founder & CEO Shannon Hursey, Director of Transportation Access Tusc Board of Directors

Appendix C

Title VI Notice to the Public

Notifying the Public of Rights Under Title VI

Access Tusc

- The Access Tusc 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 Access Tusc.

- For more information on the Access Tusc's civil rights program, the procedures to file a complaint, or to file a complaint, please contact the Founder & CEO at 234-801-8011 (TTY 800-750-0750); email jessica@accesstusc.org; or visit our administrative office at 1458 5th Street NW, New Philadelphia, Ohio 44663. For more information, visit www.accesstusc.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 234-801-8011.

Appendix D

Title VI Notice to the Public in Spanish

Notificación al público de derechos bajo el Título VI

- El Access Tusc opera sus programas y servicios sin distinction de raza, color y origen nacional, segun el Título VI de la Ley de Derechos Civiles. Cualquier persona que cree o que ha sido perjudicada por una práctica discriminatoria ilegal bajo el Título VI puede presentar una queja con el Access Tusc.

- Para obtener más información sobre el programa de derechos civiles de Access Tusc, o para obtener más información sobre los procedimientos para presenter una queja, por favor llame a Founder & CEO 234-801-8011 (TTY 800-750-0750), jessica@accesstusc.org, o visite nuestra oficina administrativa en 1458 5th Street NW, New Philadelphia, Ohio 44663.

- Un demandante puede presenter una queja directamente a la el Departmento de Transporte del estado de Ohio, Attn: Office of Opportunity, Diversity and Inclusion 1980 West Broad Street, Mailstop 3270, Columbus, OH 43223.

- Un demandante puede presenter una queja directamente a la Administración Federal de tránsito, Office of Civil Rights, Atención: Complaint Team, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

- Si se necesita información en otro idioma, comuníquese con 234-801-8011.

Appendix E

Complaint Process

Any individual, group of individuals or entity that believes they have been intentionally discriminated against on the basis of race, color, or national origin by Access Tusc 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 Access Tusc 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, Access Tusc 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.

Access Tusc has 45 days to investigate the complaint. If more information is needed to resolve the case, Access Tusc may contact the complainant requesting further information. The complainant has **10** business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within **10** business days, Access Tusc 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 the 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 234-801-8011

Appendix F

Title VI Complaint Form

Section I:				
Name:				
Address:				
Telephone (Home):			**Telephone (Work):**	
Email Address:				
Accessible Format Requirements?	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):				
[ ] Race	[ ] Color	[ ] 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?				
[ ] Yes	[ ] No			
If yes, check all that apply:				
[ ] Federal Agency: _____				
[ ] Federal Court _____		[ ] State Agency _____		
[ ] State Court _____		[ ] 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 234-801-8011.

Please submit this form to:

Access Tusc
Founder & CEO
1458 5th Street NW, New Philadelphia, Ohio 44663
234-801-8011
jessica@accesstusc.org

Appendix G

Transit Related Title VI Investigations, Complaints and Lawsuits

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

Appendix H

Public Participation Actives

Event Date	**Insert Agency Name** Staffer(s) or Department	**Activity**	**Communication Method** (Public notice, posters, social media)	**Notes**
24/7	All	Share QR Code on Website	Social media	QR Code and links shared for Title VI policy and documents
Monthly	Paige Dugan, BTW Staff	Core Meeting	Flyers, opportunities in community events	N/A
Quarterly	Paige Dugan, BTW Staff	Advisory Council Meeting	Flyers, opportunities in community events	N/A
Quarterly	Shannon Hursey	Tusco Bus Meeting	Public Notice, promoting agency events	N/A

Appendix J

"*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 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