



**COOS AREA TRANSPORTATION DISTRICT (CCATD)
TITLE VI PROGRAM AND NONDISCRIMINATION POLICY**

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CCATD Title VI Program and Nondiscrimination Policy including Limited English Proficiency Plan approved and adopted on January 13, 2020.

COOS CCATD AREA TRANSPORTATION DISTRICT

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SECTION 1: Introduction

The Coos CCATD Area Transportation District (CCATD) Title VI Program and Nondiscrimination Policy is intended to demonstrate compliance with the transit provider reporting requirements outlined in FTA Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients," effective October 1, 2012 (Federal Register Docket Number FTA–2011–0054). CCATD has developed a System-wide Title VI/Nondiscrimination Program in compliance with FTA's general reporting requirements for grantees. This CCATD Title VI Program and Nondiscrimination Policy will be updated every three (3) years. Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color or national origin in programs or activities receiving federal financial assistance. Presidential Executive Order 12898 addresses environmental justice in minority and low-income populations. Presidential Executive Order 13166 addresses services to those individuals with limited English proficiency. The rights of women, the elderly and the disabled are protected under related authorities. These Presidential Executive Orders and the related authorities fall under the umbrella of Title VI. CCATD Title VI/Nondiscrimination Program provides leadership, direction and policy to ensure compliance with Title VI of the Civil Rights Act of 1964 and related authorities. CCATD is proud of its policy to ensure that social impacts to communities and people are recognized early and continually throughout the transportation decision-making process.

Policy Statement

A 1994 Presidential Executive Order directed every Federal agency to make environmental justice part of its mission by identifying and addressing the effects of all programs, policies, and activities on "minority populations and low-income populations." The DOT's environmental justice initiatives accomplish this goal by involving the potentially affected public in developing transportation projects that fit harmoniously within their communities without sacrificing safety or mobility.

The CCATD assures that no person shall on the grounds of race, color, national origin, sex, age, disability or income status, gender or sexual orientation 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 or retaliation under any program or activity. The CCATD further assures every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs and activities are federally funded or not.

In the event that the CCATD distributes federal aid funds to another entity, the CCATD will include Title VI language in all written agreements and will monitor for compliance.

The CCATD General Manager is responsible for initiating and monitoring Title VI activities, preparing required reports and other responsibilities as required.

1.2: Authorities

Title VI of the Civil Rights Act of 1964 provides that no person in the United States shall, on the grounds of race, color or national origin, 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. (Please refer to 23 CFR 200.9 and 49 CFR 21). Title VI of the Civil Rights Act of 1964, 42 United States Code 2000d to 2000-4; 42 United States Code 4601 to 4655; 23 United States Code 109(h); 23 United States Code 324; Department of Transportation Order 1050.2; Executive Order 12250; Executive Order 12898; 29 Code of Federal Regulations 50.3

Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of terms "programs or activities" to include all programs or activities of Federal Aid recipients, sub recipients, and consultants, whether such programs and activities are federally assisted or not (Public Law 100259 [2.557] March 22, 1988. FTA Circular 4702.1B, dated May 13, 2007"Title VI and Title VI-Dependent Guidelines for Federal Transit Administration Recipients.

The National Environmental Policy Act of 1969 (NEPA) stressed the importance of providing for "all Americans safe, healthful, productive, and esthetically pleasing surroundings", and provided a requirement for taking a "systematic, interdisciplinary approach" to aid in considering environmental and community factors in decision making.

1.3: Federal Transit Administration Civil Rights Assurance

CCATD hereby certifies that as a condition of receiving Federal financial assistance under the Federal Transit Act of 1964, as amended, it will ensure that:

No person on the basis of race, color, national origin, age, gender or sexual orientation will be subjected to discrimination in the level and quality of transportation services and transit-related benefits.

The CCATD will compile, maintain, and submit in a timely manner Title VI information required by FTA Circular 4702.1B and in compliance with the Department of Transportation's Title VI regulation, 49 CFR Part 21.9.

The CCATD Board of Directors will make it known to the public that those person or persons alleging discrimination on the basis of race, color, or national origin as it relates to the provision of transportation services and transit-related benefits may file a complaint with the Federal Transit Administration and/or the U.S. Department of Transportation.

The CCATD is responsible for ensuring that all sub recipients of FTA funds comply with all applicable federal and state regulations and program requirements.

1.4: Environmental Justice

On February 11, 1994, President Clinton issued Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations". The CCATD recognizes that the goal of Environmental Justice is to ensure that any adverse human health or environmental effects of any government activities do not disproportionately affect minority or low-income populations. We recognize that Environmental Justice does not intend to provide preferential treatment to these populations, but rather fair treatment to all populations.

Specific to transportation, Executive Order 12898 has been issued in order to ensure that all federally funded transportation-related programs, policies, and activities that have the potential to cause adverse effects, specifically consider the effects on minority and low-income populations.

The CCATD is committed to the value of protecting individuals from discrimination on the bases primarily of race, color and national origin in transportation programs and activities as required under [Title VI of the 1964 Civil Rights Act](#).

Under the Federal environmental justice guidelines minority and low-income populations are defined as:

- Black - a person having origins in any of the black racial groups of Africa.
- Hispanic - a person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race.
- Asian American - a person having origins in any of the original peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands.
- American Indian and Alaskan Native - a person having origins in any of the original people of North America and who maintains cultural identification through tribal affiliation or recognition.
- Low-Income - a person whose household income (or, in the case a community or group, whose median household income) is at or below the U.S. Department of Health and Human Services poverty guidelines.

In order to integrate, into environmental analysis considerations expressed in the DOT Order on Environmental Justice, recipients conducting an analysis of construction projects should incorporate an environmental justice analysis into the National Environmental Policy Act (NEPA) documentation of construction projects.

FTA recommends that recipients preparing an environmental assessment (EA) or an environmental impact statement (EIS) integrate the following components into their documents.

- Description of the low-income and minority population within the study area and the methodology used to identify the population.
- All adverse effects of the project both during and after construction that affect the identified minority and low-income population.
- All positive effects that would affect the identified minority and low-income population.
- All mitigation and environmental enhancement actions incorporated into the project to address the adverse effects.
- The remaining effects, if any, and why further mitigation is not proposed.
- For projects that traverse predominantly minority and low-income and a predominantly non-minority and non-low-income areas, a comparison of mitigation and environmental enhancement actions that affect predominantly low-income and minority areas with mitigation implemented in predominantly non-minority or non-low-income areas.

An environmental justice analysis will be conducted in regards to all construction projects. At a minimum the following factors will be considered:

- A. Does the project area contain higher than average concentrations of traditionally underserved groups when compared to the area surrounding the project area or the city or CCATD as a whole?
- B. Does the project area have a history of other projects or actions that may have had disproportionately high or adverse impacts on the local residents?
- C. Are the areas in which these populations are located subject to disproportionate impacts?
- D. Will the proposed project increase traffic in low-income and minority neighborhoods? If so, will the increase be greater than in non-minority or non-low-income neighborhoods?
- E. Will minority owned businesses that serve a minority or low-income population be impacted by the project?
- F. Will access from minority or low-income neighborhoods to various services or cultural destinations (church, parks, community center) be affected by the proposed project?
- G. Will the project require displacement of any minority or low-income residences? If so, are they disproportionate?
- H. Will the project result in proportional change of minority or low-income household in the area that will have access to transit services reduced?
- I. Are the benefits associated with the project equitable for all segments of society?
- J. Have all groups within the project area been involved in the decision-making or project information process through an effective and thorough public participation effort?

All reasonably foreseeable adverse social, economic, and environmental effects on minority populations and low-income populations must be identified and addressed. Adverse effects include, but are not limited to:

- Bodily impairment, infirmity, illness, or death.
- Air, noise, and water pollution and soil contamination.
- Destruction or disruption of man-made or natural resources.
- Destruction or diminution of aesthetic values.

- Destruction or disruption of community cohesion or a community's economic vitality.
- Destruction or disruption of the availability of public and private facilities and services.
- Vibration.
- Adverse employment effects.
- Displacement of persons, businesses, farms, or nonprofit organizations.
- Increased traffic congestion, isolation, exclusion, or separation of minority or low-income individuals within a given community or from the broader community.
- The denial of, reduction in, or significant delay in the receipt of, benefits of DOT programs, policies, or activities.

In the event that a disproportionately high and adverse human health or environmental effect on minority populations or low-income populations is identified, mitigation including avoidance and minimization will be considered.

In addition, disproportionate impacts on low-income and minority populations will be avoided, if practicable, that is, unless avoiding such disproportionate impacts would result in significant adverse impacts on other important social, economic, or environmental resources.

1.5: Public Transportation Service (CCAT)

CCAT Fixed Route Service

Fixed route bus service known as CCAT is comprised of two fixed routes traveling through Coos Bay and Express routes in areas surrounding the city.

CCAT Operating Characteristics:

- Two Fixed Route buses provide service in Coos Bay

Three Intercity buses connect communities across the county including Powers, Myrtle Point, Coquille, Coos Bay, North Bend, and Charleston.

- Timber Express to Coos Bay & North Bend
- Crab Express to Coos Bay and North Bend to Charleston
- And the Cranberry Express in and around the City of Bandon.

Service is not available on weekends or on the following holidays: New Year's Day, Martin Luther King Jr. Day, Independence Day, Labor Day, Thanksgiving Day and Christmas Eve, Christmas Day, Veterans Day, Memorial Day, or Presidents Day

1.6: Public Transportation Service (CCAT) Maps

Pirate Express



Coos Bay Loop - Pirate Express
Coming July 1st 2019!!!
Operating days and times: Monday thru Friday from 8:30 am to 6 pm



Stop List:

1. CCAT Office
2. Advanced Health - Coos Health and Wellness
3. Walmart - **Transfer Point**
4. Southwestern Oregon Community College (SOCC)
5. Newmark and Schoneman
6. Empire USPS
7. Star of Hope
8. Newmark and Schoneman - 7/11
9. CCAT Office
10. North Bend Medical Center (NBMC)
11. Bay Area Hospital (BAH)
12. Waterfall Clinic - Goodwill - Social Security Office
13. Downtown Coos Bay - Outdoor In - 7 Devils Brewery
14. Coos Bay Bi-Mart - USPS
15. Coos Bay Senior Center
16. DMV
17. Worksource
18. Farr's Hardware - Fred Myer - Safeway
19. VP Racing
20. Downtown Coos Bay - Outdoor In - 7 Devils Brewery
21. City Hall - City Subs - Downtown Health and Fitness
22. North Bend Medical Center (NBMC)
23. Bay Area Hospital (BAH)
24. Waterfall Clinic - Goodwill - Social Security Office

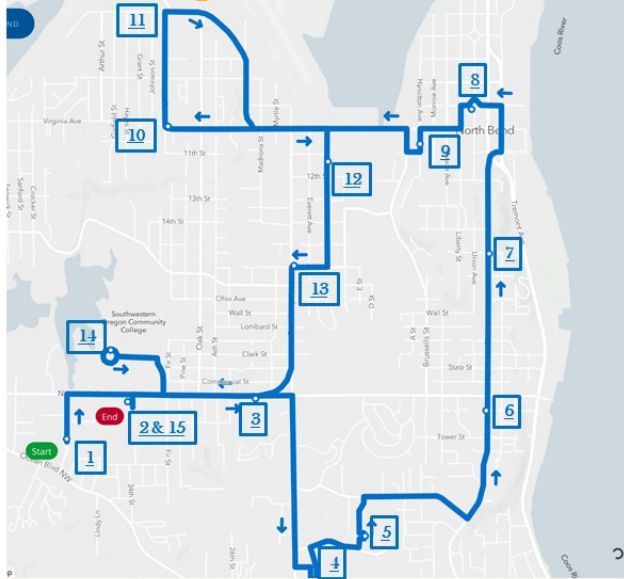
Bulldog Express



North Bend Loop - Bulldog Express

Coming July 1st 2019!!!

Operating days and times: Monday thru Friday from 8:30 am to 6 pm



Stop List:

1. Coos Health and Wellness - Advanced Health - ORCCA
2. Walmart - **Transfer Point**
3. North Bend Bi-Mart Shopping Center
4. North Bend Medical Center (NBMC)
5. Bay Area Hospital (BAH)
6. Sherman and Exchange
7. Bungalow Market
8. North Bend City Hall
9. North Bend Lanes
10. Airport Heights Market
11. North Bend Senior Center - DHS - Airport
12. VA Clinic - Safeway - Pony Village Mall
13. Dishner's Diner
14. Southwestern Oregon Community College (SOCC)
15. Walmart - **Transfer Point**

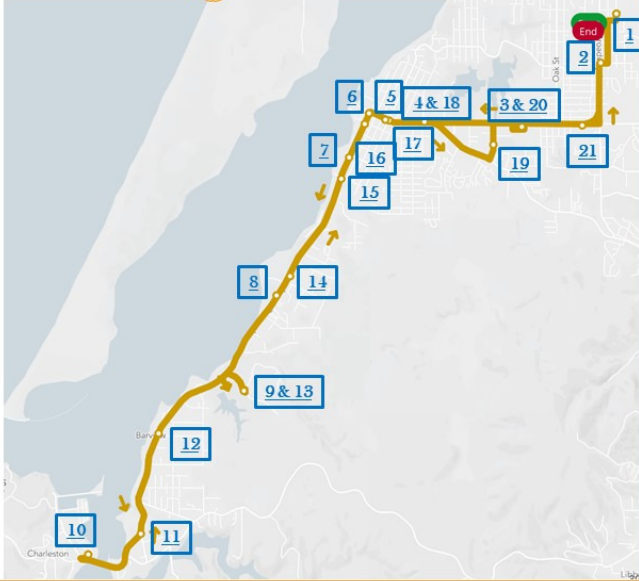
Crab Express



Charleston Intercity Connector – Crab Express

Coming July 2019!!!

Operating days and times: Monday thru Friday, 2 times daily



Stop List:

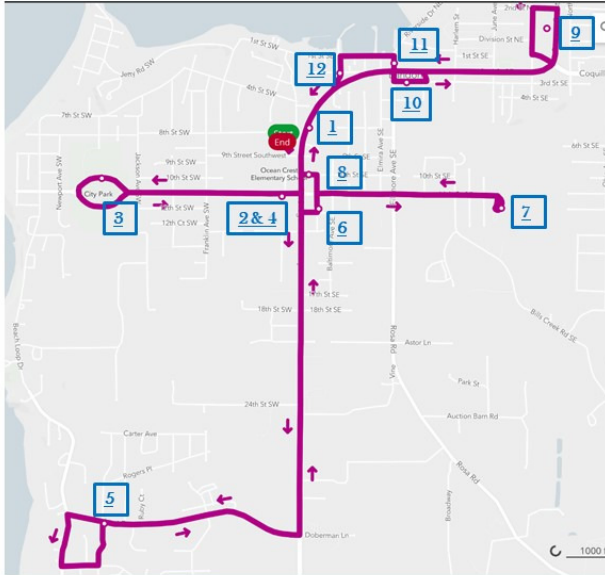
1. VA Clinic - Safeway - Pony Village Mall
2. Dishners
3. Walmart - **Transfer Point**
4. Newmark and Schoneman - 7/11
5. Empire USPS
6. The Hollering Place
7. Espresso Mill and Bakery
8. Charleston Fire Station
9. Kilkich Recreation Building
10. Charleston Visitor Center
11. Wildahl Rd. and Cape Arago Hwy.
12. Hansen's Barview Market
13. Kilkich Recreation Building
14. Sunset Market
15. Lighthouse Market
16. Empire Blvd. and Michigan
17. Star of Hope
18. Newmark and Schoneman - 7/11
19. Coos Health and Wellness - Advanced Health - ORCCA
20. Walmart - **Transfer Point**
21. North Bend Bi-Mart Shopping Center

Cranberry Express

Bandon Loop – Cranberry Express

Coming July 1st 2019!!!

Operating days and times: Monday, Wednesday and Friday from 10 am to 4 pm



Stop List:

1. City Hall
2. Bandon Youth Center
3. City Park /Library
4. Bandon Youth Center
5. Seabird and Lincoln
6. Bandon USPS (Alabama and 12th)
7. Southern Coos Hospital
8. McKay's
9. Ray's Food
10. Face Rock Creamery
11. Art by the Sea Gallery
12. 2nd and Chicago

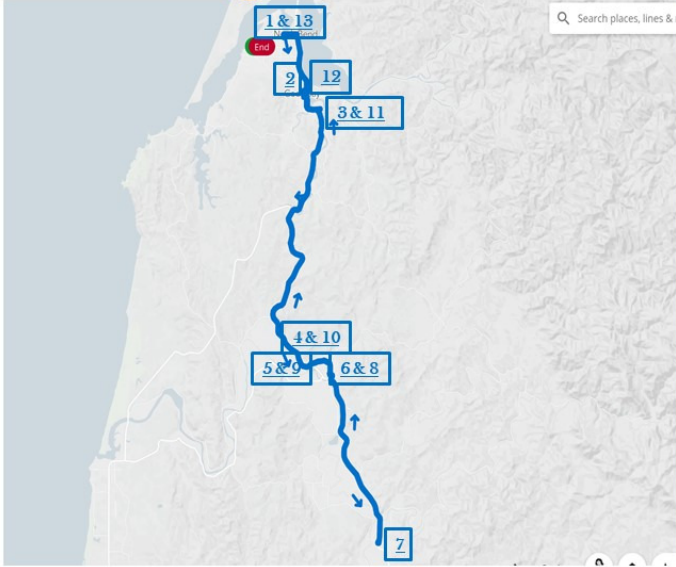
Timber Express



Coquille/Myrtle Point Intercity Connector – Timber Express

Coming July 2019!!!

Operating days and times: Monday thru Friday, 2 times daily



Stop List:

1. VA Clinic - Safeway - Pony Village Mall
2. 4th and Central - City Subs - Coos Bay City Hall
3. South Coast Business Employment Corporation (SCBEC)
4. Coquille - W. Central & N. Laurel (by County Roads Dept.)
5. Coquille McKay's
6. Coquille Courthouse
7. Myrtle Point McKay's
8. Coquille Courthouse
9. Coquille McKay's
10. Coquille - W. Central & N. Laurel (by County Roads Dept.)
11. South Coast Business Employment Corporation (SCBEC)
12. Downtown Coos Bay - 7 Devils Brewing Co.
13. VA Clinic - Safeway - Pony Village Mall

1.7: The CCATD Title VI Responsibilities for Program Areas

CCATD is committed to a policy of non-discrimination in the conduct of its business, including its Title VI responsibilities - the delivery of equitable and accessible transportation services. CCATD recognizes its responsibilities to the communities in which it operates and to the society it serves. It is CCATD's policy to utilize its best efforts to assure that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under its program of transit service delivery and related benefits.

Toward this end, it is CCATD's objective to:

- Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin;
- Identify and address, as appropriate, disproportionately high and adverse human health and environmental effects, including social and economic effects of programs and activities on minority populations and low-income populations;
- Promote the full and fair participation of all affected populations in transportation decision making;
- Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations;
- Ensure meaningful access to programs and activities by persons with limited English proficiency.

1.8: The CCATD Organization and Staffing

The General Manager is responsible for ensuring the implementation of the CCATD Title VI Program. The General Manager is responsible for the overall management and day-to-day administration of the Title VI Program and shall serve as the Title VI Specialist.

Through this program CCATD will make every effort:

- Offer mobility for all citizens whether they own a vehicle or not.
- Provide a basis for equitable treatment of communities being affected by transportation projects.
- To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations.
- To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.
- To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

- Enhance the public-involvement process, strengthen community-based partnerships, and provide minority and low-income populations with opportunities to learn about and improve the quality and usefulness of transportation in their lives.
- Minimize and/ or mitigate unavoidable impacts by identifying concerns early in the planning phase and providing offsetting initiatives and enhancement measures to benefit affected communities and neighborhoods.
- Improve data collection, monitoring, and analysis tools that assess the needs of, and analyze the potential impacts on minority and low-income populations.

1.10: Planning and Consultant Services

The CCATD has the responsibility to develop long- and short-range plans to provide efficient transportation services to the citizens of Coos County.

The Coos County Area Transit Master Plan (TMP) coordinates the future regional transportation plans and programs. A comprehensive transportation planning process is used which incorporates input from the public in coordination with the various jurisdictions affected. Planning includes the monitoring and collection of data. Title VI responsibilities include but are not limited to:

- Ensure that all aspects of the planning process operation comply with Title VI of the Civil Rights Act of 1964.
- Ensure that various social, economic, and ethnic interest groups are represented in the planning process by disseminating program information to minority media and ethnic/gender related organizations and participating in roundtable meetings in predominantly minority communities.
- Assist the Title VI Specialist in gathering and organizing the Planning section of the Annual Title VI Update Report.
- Review the division's work program and other directives to ensure compliance with Title VI and other nondiscrimination program requirements.
- Attend public meetings to verify the level of participation of Title VI protected group members when offered in predominantly ethnic minority communities.

SECTION 2: General Requirements

CCATD Title VI/Nondiscrimination Program addresses FTA's general requirements for programs, policies, and activities to document compliance with *Title VI of the Civil Rights Act of 1964*, the United States Department of Transportation (DOT) implementing regulations in 49 CFR 21 (*Nondiscrimination in Federally-Assisted Programs of the Department of Transportation-Effectuation of Title VI of the Civil Rights Act of 1964*) and FTA policies. This section briefly summarizes CCATD Title VI procedures for reference and to assist with training procedures for new CCATD transit personnel prior to initial operations. Reporting requirements for the CCAT transit system are described in further detail in Section 2.6 of this document.

2.2: The CCATD Title VI/Nondiscrimination Program

Title VI/Nondiscrimination Program:

It is the policy of CCATD, under *Title VI of the Civil Rights Act of 1964; Section 504 of the Rehabilitation Act of 1973; Age Discrimination Act of 1975; Section 324 of the Federal-Aid Highway Act of 1973; Civil Rights Restoration Act of 1987;* and related statutes and regulations, that no person in the United States shall, on the basis of race, color, national origin, sex, age, disability/handicap, or income status, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination or retaliation under any federally or non-federally funded program or activity administered by CCATD or its sub recipients.

CCATD's General Manager is delegated the authority to develop, maintain, implement, and monitor this policy as required by **23 Code of Federal Regulations (CFR) Part 200 and 49 CFR Part 21.**

2.3: The CCATD Title VI Specialist Responsibilities

The Title VI Specialist is charged with the responsibility for implementing, monitoring, and ensuring the CCATD's compliance with Title VI regulations. Title VI responsibilities are as follows:

- Process the disposition of Title VI complaints received by the CCATD.
- Collect statistical data (race, color, sex, age, disability or national origin) of participants in and beneficiaries of state highway and transportation programs, e.g., affected citizens, and impacted communities.
- Conduct annual Title VI reviews of program areas to determine the effectiveness of program activities at all levels.
- Conduct Title VI reviews of operators, service providers, consultants and other recipients of federal transportation and federal-aid highway funded contracts administered through the CCATD.

- Participate in training programs on Title VI and other related statutes for CCATD employees and recipients of federal transportation and federal-aid highway funds.
- Prepare a yearly report of Title VI accomplishments and goals, as required by 23 CFR 200.
- Develop Title VI information for dissemination to the general public and, where appropriate, in languages other than English as per the CCATD LEP Plan.
- Conduct post-grant approval reviews of CCATD programs and applicants (e.g., operators, consultants, design and relocation, and persons seeking contracts with the CCATD), for compliance with Title VI requirements.
- Identify and eliminate discrimination.
- Establish procedures for promptly resolving deficiency status and reducing to writing the remedial action agreed to be necessary, all within a period not to exceed 90 days.

2.4: The CCATD Complaint Procedure

Formal Complaints

Any person who believes the he or she, or any specific class or persons, has been subjected to discrimination or retaliation prohibited by the Title VI of the Civil Rights Act of 1964, as amended, and related statutes, may file a formal written complaint. All formal written complaints received by the CCATD shall be referred immediately by the CCATD's Title VI Specialist to ODOT Program Manager for processing in accordance with approved state procedures.

Any person who believes himself, herself, or any specific class of persons to be subjected to discrimination on the basis of race, color, or national origin may by himself or by a representative file a written complaint with FTA. A complaint must be filed no later than 180 days after the date of the alleged discrimination.

The CCATD's Title VI Specialist will advise ODOT Program Manager within five (5) calendar days of receipt of a written or oral complaint. The following information will be included in every notification:

- a) Name, address, and phone number of the complainant.
- b) Name and address of the respondent.
- c) Basis of the complaint.
- d) Date of the alleged discriminatory act or acts.
- e) Date the complaint was received by the CCATD.
- f) A statement of the complaint.
- g) Other agencies where the complaint has been made.
- h) An explanation of the actions taken or proposed by the CCATD to resolve the allegation(s) raised in the complaint.

1. Within ten (10) business days, the CCATD's Title VI Specialist will acknowledge receipt of the allegation(s), inform the complainant of the Title VI process, any action taken and/or propose to resolve the allegation(s), and advise complainant of other avenues of redress available.
2. Within sixty (60) calendar days from the receipt of the complaint, the CCATD's Title VI Specialist will investigate and provide any follow up information. The General Manager will also provide appropriate assistance to complainants, including those persons with disabilities, or to those who are limited in their ability to communicate in English.

In instances where additional information is needed for assessment or investigation of the complaint, the Title VI Specialist will contact the complainant in writing to request additional information. Failure to provide the requested information within 14 business days may result in the administrative closure of the complaint. All complaints will be tracked and logged.

3. Upon completion of the complaint investigation, the Title VI Specialist will prepare a draft written response subject to review by the CCATD Attorney. If appropriate, the Title VI Specialist will provide the complainant a written response and may administratively close the complaint.

The Title VI Specialist will advise the complainant of his or her right to file Title VI complaint externally with the United States Department of Transportation (Federal Transit Administration) or the Oregon Department of Transportation through:

U.S. Department of Transportation
Federal Transit Administration
Office of Civil Rights
1200 New Jersey Avenue, 5th Floor
Washington, DC 20590

Title VI / EJ / ADA Programs Manager
ODOT.TITLEVI@odot.state.or.us
Phone: (503) 986-3870
TTY Line: 711
Internet Relay: <http://sprintip.com>
Fax: (503) 986-6382

The CCATD's Title VI Specialist will maintain a log of all oral complaints received by the CCATD.

The Log will include the following Information:

- i) Name, address, and phone number of the complainant.
- j) Names and address of the respondent.

- k) Basis of the complaint.
- l) Date of the alleged discriminatory act(s).
- m) Date the complaint was received by the CCATD
- n) A statement of the complaint.
- o) Other agencies where the complaint has been made.
- p) An explanation of the actions the taken or proposed by the CCATD to resolve the allegation(s) raised in the complaint.

2.5: Filing a Title VI Complaint with the FTA

Individuals or organizations who believe they have been denied the benefits of, excluded from participation in, or subject to discrimination on the grounds of race, color, or national origin by a recipient of Federal Transit Administration funding can file an administrative complaint with the Federal Transit Administration's Office of Civil Rights under Title VI of the Civil Rights Act of 1964.

FTA investigates complaints on the basis of intentional discrimination or on the basis of disparate impact discrimination, where a neutral policy or practice has the effect of disproportionately excluding or adversely affecting minority beneficiaries or other protected individuals and the recipient's practice lacks a substantial legitimate justification.

Under the Executive Order on Environmental Justice and the U.S. Department of Transportation's Order to Address Environmental Justice in Minority Populations and Low-Income Populations, a member of the public, a group of people, or their representatives can file an administrative complaint against a recipient of financial assistance from FTA, a transportation provider, a transportation-related entity, or FTA itself alleging discrimination and/or adverse environmental effects, including social and economic effects, against a specific minority or low income community or population group, due to a project or activity funded or carried out by DOT.

Individuals and organizations may file a complaint by completing the FTA Title VI complaint form attached as Exhibit B. Complaints should be signed and include contact information and should be sent to:

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

FTA strives to promptly investigate the complaints received. At the conclusion of their investigation FTA will transmit a letter of finding to the complainant and the recipient. If FTA investigation determines that the recipient is not in violation of Title VI, FTA letters will explain why the recipient was found in compliance. If FTA determines that a recipient is in violation of

Title VI, FTA letters will document the violation and instruct the recipient to take action to come into compliance.

No one may intimidate, threaten, coerce, or engage in other discriminatory conduct against anyone because he or she has either filed a complaint to secure rights protected by the nondiscrimination statutes we enforce. Any individual alleging such harassment or intimidation may file a complaint with the Federal Transit Administration. We would investigate such a complaint.

Any person who believes himself, herself, or any specific class of persons to be subjected to discrimination on the basis of race, color, or national origin may by himself or by a representative file a written complaint with FTA. A complaint must be filed no later than 180 days after the date of the alleged discrimination.

2.6: The CCATD Title VI Complaint Form

Individuals or organizations who believe they have been denied the benefits of, excluded from participation in, or subject to discrimination on the grounds of race, color, or national origin may file a complaint with CCATD. A copy of the CCATD Title VI/Nondiscrimination Policy Complaint of Discrimination is posted on CCATD website, <http://www.coostransit.org/> and at the CCATD office located at 2810 Ocean Blvd, Coos Bay Oregon, 97459. The complaint form is currently available in English. The complaint forms must be signed and submitted to CCATD General Manager/Title VI Specialist by contacting:

CCATD
2810 Ocean Blvd
Coos Bay, Or, FL 97459
General Manager/Title VI Specialist
David Hope
dhope@coostransit.org
(541) 267.7111

If website access is unavailable, or you are unable to get to the CCATD office, complaint forms may also be obtained by contacting the CCATD Title VI Specialist, David Hope at dhope@coostransit.org The CCATD Title VI Complaint form is included in **Appendix A** of this document.

2.7: Public Participation

The Title VI Specialist will disseminate Title VI Program information to CCATD employees, operators, sub recipients, consultants, and beneficiaries as well as the general public.

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., provides that no person shall be subjected to discrimination on the basis of race, color, national origin, age, gender, or sexual orientation under any program or activity that receives Federal financial assistance.

Title VI and its implementing regulations require that FTA recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP).

It is the policy of the CCATD to ensure that no person is denied access to transportation services, plans and programs as the result of the inability or limited ability to communicate in the English language.

In an effort to reach minority groups the CCATD will work with faith-based groups and organizations within the various communities as a means to consider the viewpoints of low income, minority, and LEP populations in the course of conducting public outreach.

All members of the public have a right to be heard regarding all projects where federal funds are being used. Individuals have a right to be integrated into every transportation decision - from the first thought about a transportation plan to post-construction operations and maintenance. The U.S. DOT Order applies to all policies, programs, and other activities that are undertaken, funded, or approved by the Federal Highway Administration (FHWA), the Federal Transit Administration (FTA), or other U.S. DOT components:

- Policy Decisions.
- Service and Fare Changes
- Systems Planning.
- Metropolitan and Statewide Planning.
- Project Development and Environmental Review under NEPA.
- Preliminary Design.
- Final Design Engineering.
- Right-of-Way.
- Construction.
- Operations and Maintenance.

Citizens may obtain information by contacting the following office:

CCATD
2810 Ocean Blvd
Coos Bay, Or, FL 97459
General Manager/Title VI Specialist, David Hope

When deemed appropriate and reasonable, CCATD may also elect to conduct other activities to solicit public comment, including but not limited to:

- Hold public workshops in communities affected by the fare increases.
- Make presentations to local jurisdictions;
- Make presentations to business and community groups; and
- Publicize the fare increase via promotions on radio, television, and newspapers.
- Post information on the Internet.

2.8 Public Notices

When formal public notice is warranted for public hearings, CCATD shall publish a notice at least fourteen (14), days prior to proposed action. The notice shall include at a minimum:

- Proposed of public hearing;
- The date, time, and location of the public hearing;
- Address and business hours whereby information regarding the action can be available for public review;
- Contact address and period of time in which written public comment will be received;
- Contact telephone number for public to gain additional information.
- CCATD maps, schedules, and Rider's Guide will be made available in audio in order to reach persons who have a limited English proficiency.
- A statement informing persons with disabilities or those who are economically disadvantaged that may need assistance to participate in the public hearing with a number that they may call 48 hours in advance so they can be properly accommodated.
- A statement that the agency operates programs without regard to race, color, and national origin, age, gender or sexual orientation.
- A description of the procedures that members of the public should follow in order to request additional information on the recipient's or sub recipient's nondiscrimination obligations.
- A description of the procedures that members of the public should follow in order to file a discrimination complaint against the recipient or sub recipient.

Annual public hearings conducted by CCATD shall be at regularly scheduled monthly meetings at the CCATD Board meetings.

All public comments received through any of the means listed above will be summarized in a log and made available to the public upon request.

In compliance with Title 49 CFR part 21, CCATD shall provide the public with information about their protections against discrimination afforded to them by Title VI. Options for notifying the public include posting Title VI information on the agency's website, using posters, sending out comment cards, and placing flyers in transit vehicles.

2.9: Records Management

The CCATD Title VI Specialist will maintain a spreadsheet log of all informal or formal Title VI investigations, lawsuits or complaints received by CCATD. The log will include the name of the complainant; the name of the respondent, contact information for both parties, the basis of the complaint, the date the complaint(s) were received by CCATD, the date CCATD notified the ODOT Program Manager of the issue and an explanation of the actions the respective CCATD management has taken or proposed to resolve the concerns.

2.10: Title VI Training Program

Title VI training will be made available at least annually to CCATD employees, operators, consultants, sub recipients, and program area specialist. The training will provide comprehensive information on Title VI provisions, application to program operations, and identification of Title VI issues and resolution of complaints.

2.11: Title VI Program Reviews

The CCATD Title VI Program reviews will be performed by the CCATD Title VI Specialist to assess CCATD administrative procedures, staffing, and resources available for Title VI compliance. All programs will be reviewed annually to assure their effectiveness in compliance with Title VI provisions. This is in addition to the day to day monitoring. The CCATD Title VI Specialist will coordinate efforts to ensure their equal participation in all programs and activities at all levels.

2.12: Title VI Remedial Action

The CCATD will actively pursue the prevention of Title VI deficiencies and violations and will take the necessary steps to ensure compliance with all program administrative requirements. When irregularities occur in the administration of the program's operation, corrective action will be taken to resolve Title VI issues, and reducing to writing a remedial action agreed upon to be necessary, all within a period not to exceed 90 days.

2.13: Proposed Service Changes

PUBLIC PARTICIPATION POLICY CCATD will hold at least one public meeting for all proposed major service changes and all fare adjustments, advertised for a period of 30 days, in order to receive public comments.

Other languages will be available upon request. This will ensure that all Limited English Proficient (LEP) populations within the service area are informed of the proposed service and/or fare changes. The public will have at least 30 days from the date of publication to make comments.

The following is the public meeting procedures for major service changes and all fare adjustments:

1. All public meetings shall be held during a regular meeting of the CCATD Board meetings.
2. The CCATD shall advertise notice of public meetings approximately 30 days prior to the public meeting and on the CCATD website.
3. A summary of all input received from the public will be provided to all CCATD Directors for consideration in the evaluation of proposed service changes.

PROPOSED MAJOR SERVICE CHANGE & SERVICE/FARE EQUITY POLICY & PROCEDURE

The CCATD will vote on the proposed changes. CCATD will publicize the Board's decision to the public prior to implementing the major service and fare changes.

Fare increases are increases to the base full adult fare. When the full adult fare is increased, discount fares and fare media may also be increased at the same time. Fare increases are adopted by CCATD and implemented as follows:

- Prepare notices in the form of press releases, notices on-board buses, and post on the CCATD website;
- Schedule public hearings;
- Notice public hearings by advertising in local newspaper, and posting on aforementioned websites;
- Hold public hearings to gain public input.

Major service change is defined as when the change impacts more than 10% of an individual route's total service hours or 10% of an individual route's current ridership.

SECTION 3: Systemwide Service Standards and Policies

Title 49 CFR Section 21.5 states the general prohibition of discrimination on the grounds of race, color, or national origin. Section 21.5(b) (2) specifies that a recipient shall not *“utilize criteria or methods of administration which have the effect of subjecting persons to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program with respect to individuals of a particular race, color, or national origin.”* Section 21.5(b) (7) requires recipients to *“take affirmative action to assure that no person is excluded from participation in or denied the benefits of the program or activity on the grounds of race, color, or national origin.”* Finally, Appendix C to 49 CFR part 21 provides in section (3)(iii) that *“[no person or group of persons shall be discriminated against with regard to the routing, scheduling, or quality of service of*

transportation service furnished as a part of the project on the basis of race, color, or national origin. Frequency of service, age and quality of vehicles assigned to routes, quality of stations serving different routes, and location of routes may not be determined on the basis of race, color, or national origin].”

The service standards and policies for the CCATD service will be available on the website.

3.3: Service Availability:

CCATD service availability for demand response service is determined by federal regulations for ADA complementary service standards; that is, ¾ mile radius of the-fixed route service.

3.5: Vehicle Assignment:

As a small provider, the CCATD fleet consists of a relatively small number of vehicles. Replacement vehicles are brought into service when the useful lifespan of fleet vehicles is reached (based on available funding). Vehicle load service levels are all below standards and currently do not affect vehicle assignment.

CCATD does not assign vehicles to routes or type of service based upon vehicle age or other factors. The assignment is made based upon ridership demands, spare ratio, and population densities. Demand response vehicles are assigned by the size of the vehicle for the services needed.

SECTION 4: Language Assistance Plan & Limited English Proficiency Plan

Language Assistance Plan

To provide meaningful access to the CCATD’s transit programs and services the CCATD Limited English Proficiency (LEP) Plan is utilized to achieve this objective. It serves as a training tool and guide for staff on how to recognize a person who may need language assistance and how to provide that assistance.

Title VI requires that FTA recipients provide Limited English Proficient (LEP) individuals with meaningful access to benefits, services, information, and other important portions of their programs and activities. Steps to ensure meaningful access include developing a Language Implementation Plan and translating Title VI obligations and complaint procedures into languages other than English.

CCATD will translate any documents into other languages other than English upon requests. At such point that populations other than English speaking populations reach 25% of the total population served, and funding permits, CCATD will print all media in English and the alternate language.

CCATD is committed to ensuring that persons with Limited English Proficiency be given a right to participate in decisions regarding public transit services.

Title VI and its implementing regulations require that FTA recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP).

It is the policy of the CCATD to ensure that no person is denied access to transportation services, plans and programs as the result of the inability or limited ability to communicate in the English language.

In an effort to reach minority groups the CCATD will work with faith-based groups and organizations within the various communities as a means to consider the viewpoints of low income, minority, and LEP populations in the course of conducting public outreach.

All members of the public have a right to be heard regarding all projects where federal funds are being used. Individuals have a right to be integrated into every transportation decision from the first thought about a transportation plan to post-construction operations and maintenance.

The U.S. DOT Order applies to all policies, programs, and other activities that are undertaken, funded, or approved by the Federal Highway Administration (FHWA), the Federal Transit Administration (FTA), or other U.S. DOT components:

- Policy Decisions
- Systems Planning
- Service and Fare Changes
- Metropolitan and Statewide Planning
- Project Development and Environmental Review under NEPA
- Preliminary Design
- Final Design Engineering
- Right-of-Way
- Construction
- Operations and Maintenance

SECTION 5: Assessment of Compliance

CCATD has reviewed the objectives of the Title VI Program and has concluded that its Title VI Program, through this report and subsequent monitoring, meets and exceeds the objectives of providing equal access to transit service and decision-making.

Further, CCATD has established a program that will evaluate system wide service changes, improvements, and expansions based on the following to ensure that benefits are distributed equally and are not discriminatory:

- Service changes will meet CCATD overall mobility goals for the entire community;

- Service additions are market driven based on the type of service appropriate for a market segment and travel demand;
- Improvements to existing routes will include alignments to improve connectivity, improve travel time, night and weekend service; and increase frequencies; and
- Capital equipment and facilities will be equitably distributed throughout the service area.

Appendix A Title VI Complaint Form

Coos County Area Transportation District (CCATD)

TITLE VI COMPLAINT PROCEDURE AND FORM

Title VI of the Civil Rights Act of 1964, and other related laws and regulations, provide that no person shall on the grounds of race, color, national origin, sex, age, disability, and income be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity receiving federal funds.

The purpose of this form is to assist you in filing a complaint with CCATD's Title VI Coordinator. You are not required to use this form. A letter containing the same information is sufficient. However, the information requested must be provided, whether or not this form is used. ADA assistance is available upon request.

You may file a complaint against the CCATD. All complaints must be filed within 180 days of the occurrence of the alleged act or a waiver requested as indicated below. You also may file a complaint directly with the ODOT Office of Civil Rights or the FTA Office of Civil Rights.

Send All Complaints To:
CCATD: Title VI Complaint Coordinator
2810 Ocean Blvd
Coos Bay, OR 97459

1. Complainant's Name and Address:
Name: _____
Address: _____
City: _____ State: _____ Zip Code: _____
Contact Phone Number(s): _____

2. Person(s) Discriminated Against, if Different from Above.
Name: _____
Address: _____
City: _____ State: _____ Zip Code: _____
Contact Phone Number(s): _____

3. CCATD Employee that Discriminated Against You:
Name: _____
Location Discrimination Occurred:
Bus #: _____ Address: _____
City: _____ State: _____ Zip Code: _____
Date Discrimination Occurred: _____

4. Indicate the Reasons You Believe the Discriminatory Action(s) Occurred.
 Race/Ethnicity National Origin Sex

Religion

Age

Disability

5. Please explain as clearly as possible what occurred, who was involved, why you believe it occurred, and how you (or another) were discriminated against. Be sure to include how other persons were treated differently than you. (Please use additional sheets of paper, if necessary, and attach a copy of any written materials pertinent to your claim).

6. Complaints of discrimination must generally be filed within 180 days of the alleged discrimination. If the most recent date of discrimination listed above is more than 180 days ago, you may request a waiver of the filing requirement. If you wish to request a waiver, please explain why you waited until now to file your complaint.

7. Sign and Date the Complaint (We Cannot Accept Unsigned Complaints).

Print Name: _____

Signature: _____ Date: _____

Limited English Proficiency Plan

**Prepared by the CCATD
2810 Ocean Blvd
Coos Bay, Or 97459**

Adopted January 13, 2020

CCATD

Limited English Proficiency Plan

Title VI of the Civil Rights Act of 1964, as amended, protects any person in the United States on the ground of race, color, or national origin from being excluded from participation, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal financial assistance from the Department of Transportation.

This document was prepared by the CCATD staff in compliance with and to meet the requirements of Title VI of Civil Rights Act of 1964 (42 USC 2000d); 49 USC Section 5332; 49 CFR Part 21; DOT Order 1000.12; DOT Order 1050.2; DOT Order 5610.2; FTA Circular 4702.1B; Executive Order 12898; Executive Order 13166; and DOT LEP Policy Guidance.

Involving our citizens in the transit planning process including the utilization of funds, communicating the program of projects, and more importantly communicating our level of service standards to the community are all vital processes that The CCATD undertakes as part of ensuring that services are provided in accordance with Title VI.

Reaching all parts of our population and providing language assistance to persons with limited English proficiency in a competent and effective manner will help ensure that our services are safe, reliable, convenient, and accessible to everyone in our community including Limited English Proficiency (LEP) persons.

The LEP Plan plays an integral role in this process. This document will detail the LEP Plan, developed in conjunction with best practice standards for public involvement.

Language for LEP individuals can be a barrier to accessing important benefits or services, understanding and exercising important rights, complying with applicable responsibilities, or understanding other information provided by federally funded programs and activities.

Background Information

Limited English Proficient are individuals who have a limited ability to read, write, speak, or understand English, who speaks a language at home other than English as his/her primary language, and who speaks or understands English 'not well' or 'not at all'.

According to the 2015 U.S. Census, more than 12% of LEP persons aged 16 years and over reported that they do not speak English very well or not at all. The number of persons reporting that they do not speak English at all or do not speak English well grew by 5% from 2010 to 2015. Among limited English speakers, Spanish is the language most frequently spoken, followed by Chinese (Cantonese or Mandarin), Vietnamese, Korean and French.

Public transit is a key means of achieving mobility for many LEP persons. According to the 2015 Census, more than 3% of LEP persons aged 16 years and over reported use of public transit as their primary means of transportation to work, compared with about 5.1% of English speakers. Catering to LEP persons will help increase and retain ridership among the agency's broader immigrant communities in two important ways:

- 1) Agencies that reach out to recent immigrant populations in order to conduct a needs assessment and prepare a language implementation plan (pursuant to the DOT LEP Guidance) will send a positive message to these persons that their business is valued.
- 2) Community outreach designed to identify appropriate language assistance measures can also assist the agency in identifying the transportation needs of immigrant populations and ensuring that an agency's transit routes, hours and days of service, and other service parameters are responsive to the needs of these populations.

In order to increase public involvement from those who are limited in English proficiency and those who are low income through public service announcements in buses, transfer locations, local outreach organizations, libraries and certain businesses. All public announcements are to be provided at least two weeks prior to any changes/updates to public transportation services to ensure LEP, low income and general public awareness.

Introduction

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., and its implementing regulations provide that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance. The Supreme Court, in *Lau v. Nichols*, 414 U.S. 563 (1974), interpreted Title VI regulations promulgated by the former Department of Health, Education, and Welfare to hold that Title VI prohibits conduct that has a disproportionate effect on LEP persons because such conduct constitutes national origin discrimination.

Executive Order 13166: Improving Access to Service for Persons with Limited English Proficiency was signed in year 2000 to clarify Title VI of the Civil Rights Act of 1964. Its purpose was to ensure accessibility to programs and services to eligible persons who are not proficient in the English language.

This executive order stated that individuals who do not speak English well and who have a limited ability to read, write, speak, or understand English are entitled to language assistance under Title VI of the Civil Rights Act of 1964 with respect to a particular type of service, benefit, or encounter. It reads in part,

“Each Federal agency shall prepare a plan to improve access to its federally conducted programs and activities by eligible LEP persons. Each plan shall be consistent with the standards set forth in the LEP Guidance, and shall include the steps the agency will take to ensure that eligible LEP persons can meaningfully access the agency's programs and activities.”

Not only do all federal agencies have to develop LEP Plans, as a condition of receiving federal financial assistance, but also state and local recipients are required to comply with Title VI and LEP guidelines of the federal agency from which they receive funds.

Federal financial assistance includes grants, training, and use of equipment, donations of surplus property and other assistance. Recipients of federal funds range from state and local agencies to nonprofits and other organizations. Title VI covers a recipient's entire program or activity. This means all components of a recipient's operations are covered. Simply put, any organization that receives federal financial assistance is required to follow this Executive Order. The US Department of Transportation (DOT) published “Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient Person” in the December 14, 2005 Federal Register. The guidance explicitly identifies local transit operators as organizations that must follow this guidance:

*The guidance applies to all DOT funding recipients, which include state departments of transportation, state motor vehicle administrations, airport operators, metropolitan planning organizations, and regional, state, and **local transit operators**, among many others. Coverage extends to a recipient’s entire program or activity, i.e., to all parts of a recipient’s operations. This is true even if only one part of the recipient receives the Federal assistance. For example, if DOT provides assistance to a state department of transportation to rehabilitate a particular highway on the National Highway System, all of the operations of the entire state department of transportation—not just the particular highway program or project—are covered by the DOT guidance.*

The intent of this Limited English Proficiency Plan is to ensure access to the planning process and information published by The CCATD where it is determined that a substantial number of residents in Lake CCATD do not speak or read English proficiently. The production of multilingual publications and documents and/or interpretation at meetings or events will be provided to the degree that funding permits based on current laws and regulations.

Laws and Policies Guiding Limited English Proficiency Plans

The FTA references the DOT LEP guidance in its Circular 4702.1B, “Title VI and Title VI-Dependent Guidelines for FTA Recipients,” which was published on April 13, 2007. Chapter IV part 4 of this Circular reiterates the requirement to take responsible steps to ensure meaningful

access to benefits, services, and information for LEP persons and suggests that Federal Transit Administration (FTA) recipients and sub recipients develop a language implementation plan consistent with the provisions of Section VII of the DOT LEP guidance.

As part of the DOT and FTA requirements, the *LEP Plan* will be assessed and evaluated. The following matrix illustrates these laws, policies and considerations:

Title VI of the Civil Rights Act of 1964	Limited English Proficiency Executive Order 13166
Federal Law	Federal Policy
Enacted in 1964	Enacted in August 2000
Considers all persons	Considers eligible population
Contains monitoring and oversight compliance review requirements	Contains monitoring and oversight compliance review requirements
Factor criteria is required, no numerical or percentage thresholds	Factor criteria is required, no numerical or percentage thresholds
Provides protection on the basis of race, color, and national origin	Provides protection on the basis of national origin
Focuses on eliminating discrimination in federally funded programs	Focuses on providing LEP persons with meaningful access to services using four factor criteria
Annual Accomplishment and Upcoming Goals Report to FHWA	Annual Accomplishment and Upcoming Goals Report to FHWA

Determining the need

As a recipient of federal funding, the CCATD must take reasonable steps to ensure meaningful access to the information and services it provides. As noticed in the Federal Register/ Volume 70, Number 239/ Wednesday, December 14, 2005/ Notices, there are **four factors** to consider in determining “reasonable steps”.

Factor 1 - The number and proportion of LEP persons served or encountered in the eligible service population.

Factor 2 - The frequency in which LEP persons encounter Transit Programs, Activities and Services.

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

Factor 4 - The resources available to the recipient and cost.

The DOT Policy Guidance gives recipients of federal funds substantial flexibility in determining what language assistance is appropriate based on a local assessment of the four factors listed above. The following is an assessment of need in the CCATD in relation to the four factors and the transit planning process.

Title VI Language Assistance Plan

A prior 'Needs Assessment' for LEP using the U.S. Department of Transportation (DOT)'s Four Factor Analysis was undertaken to determine the presence of LEP individuals.

Four Factor Analysis:

Factor 1. Demography or the number or proportion of LEP persons

According to the 2010 Census data, 5.4% of the population of Coos County are Hispanic or Latino. It is unknown what proportion of this population is LEP.

U.S. Census's 2013 data was used to determine the percentages of LEP people. Because children under 5 years of age cannot, under any circumstances, ride alone, this data does not include them in the figures.

Coos County Population estimate, 5 years and older: 62,851

	%	Individuals
Speak only English	90.6%	56,952
Speak language other than English	4.2%	2,624
Speak English less than "very well"	1.1%	722
Spanish	2.2%	1,378
Other Indo-European	1.4%	849
Asian and Pacific Islander	0.5%	326 ¹

Factor 2. Frequency of contact with LEP persons

To this date no individuals have requested translation or language assistance.

Factor 3. Importance of the program or services affecting people's lives

¹ Population estimate total (62,851) determined by the sum of the individual categories which were provided in the last LEP plan prepared by CCAT. The total (62,851) and the line item percent by group was updated based on the corrected sum.

CCATD is a vital, affordable link to essential services such as medical services, hospitals and clinics, shopping, entertainment and connection to other transportation services that leave the area.

Factor 4. Resources and Costs

Should the need arise to provide LEP services, it will be factored at that time and budgeted accordingly.

The low density of LEP individuals in Coos County at this time makes it unnecessary to make any dramatic changes to the existing program. Minimal costs will be incurred for our informational brochure that is in the process of being translated into Spanish.

Analysis Conclusion: Title VI and its implementing regulations require that FTA recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are LEP. Coos County does not have a sufficient number of LEP persons to provide special services. However, a brochure in Spanish may be requested.

Each driver and dispatcher have available to them, “Basic Spanish for Transit Employees” developed for public transit systems in Colorado by providing instructions on how to use the public transit system in their language. If other language groups are identified in the future, CCATD will respond by providing instructions on how to use the public transit system.

Required to Provide Additional Information Upon Request. At the discretion of the FTA, information other than that required by the referenced circular may be requested, in writing, from a recipient in order to investigate complaints of discrimination or to resolve concerns about possible non-compliance with Title VI requirements. The CCATD Title VI specialist is available to provide additional information as needed and to respond to any inquiry.

Required to Prepare and Submit a Title VI Program. FTA requires recipients to report certain general information to determine their compliance with Title VI. The collection and reporting of this program constitute the recipients’ Title VI program. To ensure compliance with 49 CFR Section 21.9(b), FTA requires that all recipients document their compliance with this chapter by submitting a Title VI program to FTA’s Regional Civil Rights Officer once every three years.

Minority Representation

Coos County Board of Commissioners and the STF Committee are 100% Caucasian and English speaking. If demographics in Coos County shift greatly in the future, CCATD would make an effort to increase minority representation to reflect the community.

Facility Location Equity Analysis

There are no current planned facilities or construction projects that require a Title VI equity analysis.

Providing Notice to LEP Persons

US DOT guidance indicates that once an agency has decided, based on the four factors, to provide language services, it is important that the recipient notify LEP persons of services available free of charge in a language the LEP persons would understand. Example methods for notification include:

1. Signage that indicates when free language assistance is available with advance notice;
2. Stating in outreach documents that language services are available;
3. Working with community-based organizations and other stakeholders to inform LEP individuals of the CCATD Transit services and the availability of language assistance;
4. Including notices in local newspapers in languages other than English;
5. Providing presentations and/or notices at schools and community-based organizations (CBO).

As covered under Title VI requirements for nondiscrimination, The CCATD will include Title VI language in all Public Notice material as applicable.

Language Assistance

A goal of the CCATD is to provide user-friendly materials that will be appealing and easy to understand. The CCATD will continue to provide materials to the LEP population in alternative formats, such as schedules, flyers, users guide, depending on the work product.

The CCATD Staff Training

What the Guidance Says:

“Staff members should know their obligations to provide meaningful access to information and services for LEP persons, and all employees in public contact positions should be properly trained. An effective LEP plan would likely include training to ensure that:

- *Staff knows about LEP policies and procedures.*
- *Staff having contact with the public (or those in a recipient's custody) is trained to work effectively with in-person and telephone interpreters.*

The CCATD has incorporated the LEP Plan into the CCATD Title VI Program.

In order to establish meaningful access to information and services for LEP individuals, The CCATD will train its employees and those of its operator (if any) about the LEP Plan as part of the new employee orientation.

APPENDIX B Resolution

CCATD

Resolution supporting Transit Title VI Plan adopted January 13, 2020.

RESOLUTION 2020-

RESOLUTION OF THE CCATD APPROVING THE TITLE VI PROGRAM AND NON-DISCRIMINATION POLICY AND LIMITED ENGLISH PROFICIENCY

WHEREAS, pursuant to Title VI of the Civil Rights Act of 1964, 42 U.S.C. (“the Act”) and 49 CFR Part 21, the U.S. Department of Transportation and the Federal Transit Administration (FTA) prohibit discrimination on the basis of race, color or national origin; and

WHEREAS, as a recipient of federal funds, the CCATD is required to comply with the requirements of the Act and the applicable implementing regulations; and

WHEREAS, pursuant to FTA Circular 4702.1B, the CCATD is required to submit its Title VI program to its governing entity for approval; and

WHEREAS, the CCATD has considered and approve the Limited English Proficiency (LEP) which is a part of the CCATD 2020 Title VI Program and Non Discrimination Policy, to ensure that individuals who do not speak English well and who have limited ability to read, write, speak, or understand English are entitled to language assistance under Title VI of the Civil Rights Act of 1964 with respect to a particular type of service, benefit, or encounter and are not excluded from participating in, denied benefits of or assistance on the basis of race, color, sex, age, disability or national origin;

NOW, THEREFORE, BE IT RESOLVED, that the CCATD Board of Directors approve and adopt the 2020 Title VI Program and Non-Discrimination Policy which includes the Limited English Proficiency Plan for the CCATD.