

**CASCADES EAST TRANSIT
TITLE VI PROGRAM
August 2020**

Title VI provides that *“no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” (42 U.S.C. Section 2000d).*

I. PROGRAM OVERVIEW

Cascades East Transit (CET), operated by the Central Oregon Intergovernmental Council, is committed to compliance with Title VI of the Civil Rights Act of 1964 and all related regulations and directives. CET assures that no person shall on the grounds of race, color, national origin, gender, age or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any CET service, program or activity. CET also assures that every effort will be made to prevent discrimination through the impacts of its programs, policies and activities on minority and low-income populations. In addition, CET will take reasonable steps to provide meaningful access to services for persons with Limited English Proficiency (LEP).

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color or nation 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. These Presidential Executive Orders fall under the umbrella of Title VI.

The Title VI Program is responsible for providing leadership, direction and policy to ensure compliance with Title VI of the 1964 Civil Rights Act and environmental justice principles.

COIC 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 to ensure nondiscrimination in all of its programs, activities and services.

II. OBJECTIVES

CET established a Title VI Program in accordance with Department of Transportation regulation 49 CFR Part 21. COIC is the recipient of federal financial assistance from the Department of Transportation and as a condition of receiving this financial assistance, COIC signed an assurance that it will carry out the program in accordance with requirements of Title VI of the Civil Rights Act of 1964.

The primary objectives of CET's Title VI Program are to:

- a) Ensure that the level and quality of transportation service is provided without regard to race, color, national origin, gender, age or disability;
- b) Identify and address, as appropriate, disproportionately high and adverse human health and environmental effects, including social and economic effects of program and activities on minority populations and low-income populations;
- c) Promote the full and fair participation of all affected populations in transportation decision making;
- d) Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority population or low-income populations; and
- e) Ensure meaningful access to program and activities by persons with limited English proficiency (LEP). LEP is a term used to describe people who do not speak English as their primary language and who also may have limited ability to read, write, or understand English.

The Transportation Director has been designated as the Title VI Compliance Manager. In that capacity, the Transportation Director is responsible for implementing all aspects of the Title VI Program. Implementation of the Title VI Program is accorded the same priority as compliance with all other legal obligations incurred by COIC for CET in its financial assistance agreements with the Department of Transportation.

Once approved by the COIC Board, the revised Title VI Program will be disseminated to each CET Program Manager, Administrator, Supervisor and Lead for circulation within their work units. A copy of the complete Title VI Program will be kept on file in the offices housing CET personnel and the COIC Administration office. The Program will also be posted on the CET website and hard copies will be available upon request to the COIC Administration office. COIC will seek concurrence from the FTA.

III. PUBLIC PARTICIPATION PLAN

Public participation is the process by which an organization consults with interested or affected individuals, organizations and government entities before making a decision. It is a two-way communication and collaborative problem solving effort intended to guide and manage diverse

opinions. This Public Participation Plan guides the dissemination of information and establish a framework for the solicitation of public comment on the development and review of programs and projects carried out by CET. To the extent possible, the goal is to provide opportunities for proactive, early and continuing public participation for projects, programs, and decision making to ensure that these programs reflect community values and benefit all segments of the community equally.

To comply with these objectives, CET adopted the suggested methodology and framework set forth in the Title VI reporting guidelines (FTA Circular 4702.1B, Chapter IV). By using this methodology, CET monitors and compares performance of its routes based on level of service and quality of service criteria. To facilitate this evaluation, CET collects data relating to its service standards, such as load factor, vehicle assignment, frequency, and on time performance. These analyses are conducted on a route-by- route basis, thus enabling a system-wide evaluation. The findings of these analyses are used to guide service delivery in line with the stated objectives of the Title VI program. CET shall submit Title VI reports to FTA every three years, documenting the results of this methodology and CET's compliance with the Title VI regulations.

CET PUBLIC PARTICIPATION ELEMENTS

Public Outreach

CET uses many methods to achieve the best possible level of communication with our community, and especially our transit riding public. Below is a list of key communications efforts used to reach the public.

- CET has a Regional Public Transportation Advisory Committee (RPTAC) that is comprised of members of the public. RPTAC members review all proposed changes to fares, policies, and services to ensure the public has a strong voice at the highest possible level on topics that affect our riders and all members of the communities for which we serve. RPTAC recommendations go straight to the COIC Board of Directors. RPTAC members participate in public forums, transit plan development, and other outreach-related activities. RPTAC and COIC Board meetings are open to the public and are publicly noticed.
- CET publishes proposed changes using public notices in regional news outlets and community bulletin boards, notices onboard transit vehicles and at transit facilities, website and social media posts, and outreach to stakeholder groups.
- All public meetings that involve transit business held by COIC/CET are open to the public and noticed on our website and social media platforms. People needing accommodation are given a contact to request assistance such as assisted listening devices, a sign language interpreter, or materials in alternate formats.

CET staff conducted a series of public meetings in each community served by CET in 2019 as a part of the 2040 Regional Transit Master Plan process. At least two meetings were held in each Central Oregon community, and participation by all interested parties was encouraged through advertisements in local news outlets, newsletters, website and social media posts, and through local agencies and project

stakeholders. The meetings provided an opportunity for community members to give input on priorities for transit and acceptable options to fund current and future service. All Central Oregon residents were encouraged to participate in public meetings and have their voices heard. COIC has worked to be accommodating to the needs of the entire community in order to best represent their interests in their public transit system. A bilingual (English-Spanish) CET staff was present at the Jefferson County meetings to communicate with any Spanish-speakers.

Citizen Input

The CET customer comment form process is designed to solicit comments, complaints and suggestions from the public. The public may provide feedback by phone, mail, or email. The CET customer comment form is available at all transit related sites and on the CET website. Every comment is reviewed by the CET Quality Assurance Lead, who then involves appropriate CET staff and resources to gather information and resolve the matter. Comments are often presented during weekly CET Manager's Meetings for discussion and consideration.

CET will solicit public input on an ongoing basis through a CET social media strategy. Actively managed social media accounts provide opportunities for proactive, early, and continuing public participation across a variety of CET projects and programs.

Mailings and other outreach efforts may be conducted to solicit input from a forum of organizations serving minorities, low-income individuals, as well as people with disabilities and limited-English proficient populations. More structured meetings may be held on specific proposals and projects when desirable to expand support and encourage broad-based public participation in the development and review of programs and projects.

CET will promote opportunities for the inclusion of minority, low-income, and limited- English populations in this forum. Public input shall be drawn from the social service agency and non-profit organizations within the community.

Service/Fare Changes

CET will undertake a comprehensive and inclusive public participation and outreach process in the event of a major service or fare change. During the public outreach period, CET will post information and accept comments regarding the proposed change on CET's website. CET will also provide surveys on buses to allow riders the opportunity to comment on how a proposed service change may affect their ability to access important destinations. Prior to hosting formal public hearings on proposed route or fare changes, CET will employ the strategy previously described. CET may hold public information meetings in local communities; stakeholder group meetings; and present the changes to its Regional Public Transportation Advisory Committee. The purpose of such efforts is to include minority, low-income and LEP populations in the planning stages of the change.

Monitoring and Evaluation

CET will monitor, evaluate and improve its public participation process. The number of individuals on

CET's contact list that receive newsletters, meeting notices and agendas, and other related materials will be monitored. Additionally, staff track social media metrics such as the numbers of Likes and Shares on relevant posts. CET encourages the public to provide comments and suggestions through various channels and maintains an open dialogue with advisory groups throughout the community on transportation and planning issues. A record of public comments and those of institutional representatives are kept as well as CET response to such comments, where pertinent.

IV. LANGUAGE ASSISTANCE PLAN

CET recognizes the importance of providing information to its riding public in varied formats to provide excellent customer service to all riders, regardless of what language they speak or read. A major goal is to provide easy to use information that crosses language barriers in multiple access points to encourage greater use of transit in our region.

MEANINGFUL ACCESS

Presidential Executive Order (EO) 13166 states that recipients must provide LEP persons an equal opportunity to benefit from and ensure *meaningful access* to its programs and services that are normally provided in English.

Demographics – The decision to provide language assistance services shall include an assessment of the number or proportion of LEP persons from a particular language group served or encountered in the surrounding community area. The greater the number or proportion of LEP persons served or encountered, the more likely language services are needed. Generally, identifying any community where the LEP population equals 5 percent or more in a given language triggers providing language assistance services as a mandatory and normal part of your program operation.

CET provides public transportation services to Deschutes, Jefferson, and Crook Counties. The percentage of the population in the three counties for which CET serves that has limited English proficiency, and the language spoken by the largest LEP population in each county, is shown in Attachment A. The chart shown is an extract of the US Census Bureau's pooled 2013 American Community Survey report named Languages Spoken by Limited English Proficient (LEP) Individuals Statewide and by County available at www.lep.gov/demog_data/demog_data.html). Attachment A shows that 6.09% in Jefferson County have limited English proficiency and speak Spanish.

Frequency of Contact

The more frequent the contact with a particular language group, the more likely that enhanced services in that language are needed.

Importance of Contact

As a general rule, the more important the activity, information, service or program, or the greater the possible consequences of the contact to the LEP individuals, the more likely language services will be needed. If the denial or delay of access to services or information could have serious implications for the LEP individuals, procedures should be in place to provide language assistance to LEP persons as part of standard business practices.

Analysis Summary

On the basis of the frequency of contact with clients served, the importance of the service provided, and the demographics chart shown in Attachment A (an extract of the Oregon table of the Migration Policy Institute prepared February 2013), CET's Title VI Program Manager continues to implement the steps described below to provide meaningful access to the significant Spanish speaking population within Jefferson County, which has an LEP population greater than 5 percent, as well as to other diverse communities across Central Oregon, when possible.

PROVIDING LANGUAGE ASSISTANCE

CET shall make the following language assistance resources available to LEP persons participating in its programs or activities:

- Bilingual staffing
- Telephone interpretation
- Qualified paid interpreters
- Translate vital documents

Training shall include how to obtain language assistance services and how to communicate needs to interpreters and translators. Providing language assistance in some program areas may also mean training staff to avoid using acronyms or industry jargon when communicating with LEP individuals.

Language services shall be provided at a time and place that avoids the effect of denying access to the service or benefit of the program. However, in some situations it may be reasonable to ask the LEP individual to return at a specified date and time to allow time for the arrangement of interpreter services.

Because LEP persons can file a complaint on the basis of national origin, staff shall be trained on how to properly handle a Title VI complaint (see Attachment B – Title VI Nondiscrimination Complaint Procedures).

CET currently has the following resources available to provide meaningful access to CET services and programs by persons with LEP:

- Bilingual staff (English/Spanish)
- Language Line – (877) 886-3885. This resource offers interpreter services for more than 170 languages, 24/7/365. The language line may also be utilized by persons with LEP to file a complaint.

TRANSLATING VITAL DOCUMENTS INTO LANGUAGES OTHER THAN ENGLISH

CET will convey information that critically affects the ability of the recipient/customer to make decisions on his or her participation in the program. The CET program involves interaction with the public as a part of daily operations and includes contact with one or more LEP populations. Given the importance of the program or service involved and the consequence to the LEP person if the information is not provided, notices and other written documents are critical.

Documents translated shall include, but are not limited to:

- Notifying the Public of Rights under Title VI (Attachment B)
- Title VI Complaint Procedures (Attachment C)
- Title VI Complaint forms (Attachment D)
- Published rider guides
- Bus schedules and fares,
- Application forms for eligibility on our Bend Dial-a-Ride program
- Rider surveys that gather rider feedback
- Public involvement information; notices of proposed public hearings regarding proposed transportation plans, projects or changes
- Public participation meeting minutes
- Written notices of denials, losses or decreases in benefits (i.e., right of way relocations)
- Community outreach notices
- Notice advising LEP persons of free language assistance

The Notifying the Public of Rights under Title VI are posted in both English and Spanish at the following locations:

- Within every CET revenue vehicle,
- Hawthorne Station Lobby (in Bend)
- Redmond Hub (in Redmond)
- Bear Creek CET admin/operations facility lobby (in Bend)
- Antler CET call center/operations facility lobby (in Redmond)

PROVIDING NOTICE TO LEP PERSONS

It is important to inform LEP persons these services are available free of charge. This information should be provided in a notice in a language the LEP person will understand. Some notification ideas include:

- Posting signs in areas where the public is likely to read them.
- Stating in outreach documents (brochures, booklets, pamphlets, flyers) that language services are available.
- Working with community-based organization to inform LEP persons of the language assistance available.
- Using a telephone voice mail menu in the most common languages encountered.
- Including notices in local newspapers in languages other than English.
- Presentations and/or notices at schools and religious organization for important events or where community involvement is critical.

OUTREACH EFFORTS

Contacting LEP populations to engage them in the planning process is critical. Media and communications directed to those populations include written notices in local news outlets, announcements on the CET website, and relevant social media platforms. CET worked diligently to accommodate to the needs of the entire Central Oregon community in order to best represent their interests in the public transit system and have their voices heard.

CET staff conducted a series of public meetings in each community served by CET in 2019 as a part of the 2040 Regional Transit Master Plan process. At least two open house meetings were held in each Central Oregon community, and participation by all interested parties was encouraged through advertisement in local news outlets, discussed at committee and stakeholder meetings, and promoted through the distribution of flyers at community organizations and local businesses, in addition to website notifications, newsletters, press releases, and social media platforms.

The open houses provided an opportunity for members of each community to give input on priorities for transit and acceptable options to fund current and future services. A bilingual (English-Spanish) COIC staff was present at meetings in Jefferson County (LEP population of greater than 5 percent) to communicate with any Spanish-speakers. All published materials included a request for information in an alternative format or language, as well as having an interpreter on-site the open house events. Staff translated all relevant meeting materials into Spanish including promotional flyers, open house and on-board surveys, and the RPTAC application (paper and online versions). To ensure community participation, staff actively engaged organizations that represent those who experience disabilities, low-income populations, communities of color, LEP populations, and tribal members.

COIC's Outreach and Engagement Administrator led the outreach effort along with support staff to encourage community participation, especially among disadvantaged and LEP populations. The

Outreach and Engagement Administrator works diligently to ensure effective and timely outreach to LEP populations and other underserved populations. The Administrator regularly attends meetings with diverse stakeholder groups to discuss enhanced LEP outreach and communications strategies, in addition to participating in community and partner events throughout the year to distribute bilingual transit information and develop trip plans for riders needing further assistance. Information regarding advisory committee recruitment opportunities is provided to LEP individuals and community organizations.

This personalized outreach has been effective in helping riders better understand the fare structure, stop locations, route selection, transfer points, and first-and-last mile connections. Furthermore, the Administrator developed a new suite of transit materials specifically for Spanish-speaking audiences. These materials are provided on buses and at transit hubs, and are also distributed to diverse businesses and community organizations. Additionally, CET drivers working in Madras have been given training on how to assist individuals speaking Spanish with their travel plans.

CET continues to be innovative and proactive in engaging people from different cultures, backgrounds and businesses in the public involvement aspect of planning and project development and other program areas such as planning bus routes, fare adjustments, and other programs or services involving the public.

TECHNICAL ASSISTANCE

The CET Title VI Compliance Manager is responsible for providing CET managers and staff with the necessary technical assistance. This includes advising about LEP requirements and implementation, and assisting in developing individual program procedures to ensure compliance.

COMPLIANCE & REPORTING

CET Managers are responsible for ensuring that meaningful services to LEP persons are provided in the respective programs. This Plan must be incorporated by reference into the appropriate CET procedure manual in order to ensure that employees are aware of their obligations for compliance.

The Title VI Coordinator will monitor CET programs to ensure LEP requirements are fulfilled and report annually to the Title VI Manager on the accomplishments related to LEP activities in the Title VI Assurance Update Report.

In monitoring compliance, an assessment will be made whether the program procedures allow LEP persons to overcome language barriers and participate in a meaningful way in the program activities and services. The program area's appropriate use of methods and options detailed in this LEP Plan will demonstrate their intent to comply with LEP requirements and Title VI of the Civil Rights Act of 1964.

For information regarding this Plan, you may contact the following individuals:

- 1) Andrea Breault, Interim Transportation Director
Title VI Compliance Manager
(541) 548-9543

- 2) Derek Hofbauer, Outreach & Engagement Administrator
Title VI Compliance Coordinator
(541) 548-9534

CASCADES EAST TRANSIT SERVICE POLICIES

Transit Amenities

Transit amenities refer to fixed items of comfort and convenience available to the general riding public such as bus stop benches, shelters, lighting, and bike racks. CET Policies or standards address service and standard thresholds for how amenities are located throughout the transit system of each participating municipality. CET policy is to review and ensure amenities are placed within each city without regard to race, color, national origin, or income considerations.

Bus stop amenities are provided by a myriad of sources including local governments, private developers, citizens groups, as well as funds flowing to CET. At times these amenities are not owned or maintained by CET and are put in place without direction or control of the transit agency.

CET inventories existing amenities within CET's control and determines where new or replacement facilities should be located based on bus stop boardings, waiting times, other nearby shelters and amenities, ADA accessibility, and adequate right-of-way.

Vehicle Assignment

Vehicle assignment refers to the allocation of transit vehicles to ensure that all communities receive the same quality of rolling stock benefits. Benefits include the vehicle age and on-board amenities.

Within a given service type (mode), CET buses differ primarily by length of vehicle and age. Amenities such as air conditioning and upholstery are standard. Length of vehicle is determined by the ridership load and type of service, leaving age the primary variable to consider in equitable vehicle assignments. CET average fleet age for each service type as of the adoption of this Policy is shown in the following table.

Table 1: CET Average Fleet Age for Each Service Type

Service Type	# of Active Vehicles	Average Age of Vehicles
Bend Fixed Route	17	4.5
Community Connector	9	5.5
Recreational Service	7	7.8
Bend Dial A Ride	12	10.5
Rural Dial A Ride	21	7.6

Within the restrictions set by FTA of moving vehicles between service types, and capacity requirements for particular routes, in order to ensure equitable distribution of vehicles based on vehicle age, each route is randomly assigned buses without regard to the vehicle age, as maintenance and repair needs permit.

V. CASCADES EAST TRANSIT SERVICE STANDARDS Vehicle Load

(A ratio of the number of passengers allowed at one time to the number of seats on a vehicle, relative to the vehicle’s maximum load point.)

The Maximum Load Factor, measured as a percent of a fully seated load, varies with service type. Load Factors for individual service types are shown in the following table.

Table 1: Load Factors by Service Types

Service Type	Peak	Off-Peak
Bend Fixed Route	120%	100%
Community Connector	120%	100%
Recreation Service	120%	100%
Bend Dial A Ride	100%	100%
Rural Dial A Ride	100%	100%

To ensure service quality, any service consistently operating at more than 100% of its seating capacity (load factor) will be evaluated to identify ways to reduce overcrowding.

Vehicle Headway

(The amount of time between two vehicles traveling in the same direction on a given line or combination of lines.)

Bend Fixed Route: Routes generally have 30 or 45 minute headways during both peak and non-peak times on weekdays. Those shift to 60 minute headways on Saturdays.

Community Connector (inter-city service): Generally, routes have headways of approximately 80 minute during both peak and non-peak times. Specific routes vary depending on the drive time between specific communities. It should be noted the number of runs per day on a route are determined by historical ridership, planning, budget considerations and consultation with each sponsoring partner as described in the Service Availability section below. The headways shift to between 90-250 minute headways on Saturdays.

Recreational Service: During winter months, route 18 generally operates Thanksgiving through mid-April. Route 18 has headways of 30 to 40 minutes during the peak and 60 to 90 minutes during the non-peak. It should be noted the number of runs per day on this route is determined each season by historical ridership, planning, budget considerations and consultation with each sponsoring partner. During summer months, the Lava Butte service provides public transit rides to the top of Lava Butte and back. This service has a 20 minute headway. Also during summer months, the Ride the River service provides public transit rides to individuals who have floated down the Deschutes River and need transportation back to their most common entry point. This service has a 30 minute headway; with a 15 minute headway during peak requirements.

Bend Dial A Ride: Not Applicable.

Rural Dial A Ride: Not Applicable.

On-Time Performance

(A measure of runs completed as scheduled)

Bend fixed route, Community Connector and Mountain Services: On time performance is measured separately against published schedules and actual bus departure times at designated bus stops or time points throughout each route. A bus is considered "on time" if it departs not more than four minutes late or one minute early at each scheduled time point/stop. For the Bend fixed route system, there is approximately one time point for every 5 bus stops. Actual bus arrival times are captured by CET's automatic vehicle location (AVL) system which uses Global Positioning System (GPS) technology. Bus on time performance can be impacted by traffic congestion, detours, weather, a larger than anticipated number of boardings, and boardings of passengers

with accessibility needs.

Bend and Rural Dial A Ride: A bus is considered "on time" if it arrives not more than 30 minutes late or one minute early at each scheduled pick up. Actual bus arrival times are captured by the driver indicating so on their individual tablets within the vehicle. Bus on time performance can be impacted by traffic congestion, detours, weather, a larger than anticipated number of boardings, and boardings of passengers with accessibility needs.

Table 2: On Time Performance Standards

Service Type	Minimum	Goal
Bend Fixed Route	90%	95%
Community Connector	90%	95%
Recreational Service	90%	95%
Bend Dial A Ride	90%	95%
Rural Dial A Ride	90%	95%

CET's On Time performance will be provided to the COIC Board annually.

Service Availability

(A general measure of the distribution of routes within an agency's service area)

CET Community Connector service connects nine communities of various size spread over Crook, Deschutes and Jefferson Counties. Additionally, CET provides different in-town transit services within six of these communities. The type and scope of the transit service within and between each community is adjusted periodically after reviewing historical ridership, planning, budget considerations with each respective local match partner. The services are delineated in a purchase service agreement or intergovernmental agreement between COIC and each of the communities. This means that each community determines the number of routes, service frequency, service span, and service coverage areas as operated by CET.

VI. Construction Programs

To date, COIC has not constructed a facility (such as vehicle storage facility, maintenance facility or operations center) using FTA funds. When it does in the future, it will conduct an equity analysis as

part of the project as required under Title VI regulations.

VII. Membership of the Regional Public Transportation Advisory Committee

PURPOSE

Committee members are appointed by the COIC Board to review, advise and assist the transportation program in its efforts:

- To help identify the transportation needs of Central Oregon residents.
- To help educate the communities on the value and offerings of public transportation.
- To serve as a forum where citizens can provide comments about service expansions, reductions, or alterations.
- To meet with concerned citizens regarding unresolved issues.
- To advocate for new and expanded services.
- To review future plans for services.
- To consider and make a recommendation on transit issues presented to the committee.
- To consider and make a recommendation on policy issues presented to the committee.
- To serve as the forum for a rider to appeal a loss of a ridership privilege and to make a recommendation regarding determination.

CONSTITUENCY OF THE COMMITTEE

To qualify to serve on the Regional Public Transportation Advisory Committee, an individual must fill out an application, reside within Central Oregon and represent one of the following communities: Bend, Redmond/Terrebonne, La Pine/Sunriver, Sisters, Warm Springs, Culver/Metolius, Madras, Prineville/Powell Butte. An applicant should be knowledgeable about public transportation, and be interested in the growth of public transportation. Representation can be met by living or working in one of the above communities. Additionally, a new member should fit into one of the following categories:

1. User of transportation services who is elderly or disabled.
2. Non-profit provider of transportation to persons who are elderly or have a disability.
3. A representative of human services agency.
4. A representative of the business community.
5. A representative of the community at large.
6. Other categories as determined by the COIC Board.

The Transportation Manager or her/his designee shall be appointed as the committee liaison, and shall have no voting ability.

The RPTAC Chair shall act as the liaison for the Committee to the COIC Board.

APPOINTMENT AND TENURE OF COMMITTEE MEMBERSHIP

Nominations and applications for appointment can be accepted at the COIC Administrative Office. The COIC Board will make selection of committee member. The committee shall consist of thirteen members, with five members representing Bend, two members representing Redmond, and one member representing each of the following areas: La Pine/Sunriver, Sisters, Prineville/Powell Butte, Madras, Culver/Metolius, Warm Springs.

The term of service for committee members shall be for two (2) years. Initial terms for (1/2) one half of the appointees will be for (3) three years. While re-appointment to the Committee is permissible, no person shall serve more than three (3) consecutive two-year terms.

Membership terms shall expire on June 30 of the second year.

A vacancy on the Committee may occur by resignation, relocation or by the declaration of vacancy by the COIC Board. Any vacancy shall be filled in a manner consistent with the aforementioned nominations and appointment procedures. The appointee's term for service shall be the length of the unexpired term.

ENCOURAGING PARTICIPATION OF MINORITIES ON THE COMMITTEE

The role of the Regional Public Transportation Advisory Committee and the need (if any) to fill current vacancies is discussed at all public transit meeting/events. A summary of CET's recent outreach efforts has been provided in both the Public Participation Plan and Language Assistance Plan sections above. At such opportunities, any/all individuals interested in working on the Committee are encouraged to fill out a RPTAC Application for review and consideration.

CET staff will continue to encourage individuals that may have limited English proficiency to apply for membership on advisory committees. During the 2040 Transit Master Plan update process, LEP organizations and advocacy groups were contacted in 2019 regarding membership opportunities on RPTAC.

The table below depicts Membership of the Regional Public Transportation Advisory Committee, Broken Down by Race.

Body	Population, July 2017 Estimates*	Caucasian**	Latino**	African American**	Asian American**	Native American**
Population, Crook Cty	22,105	92.8%	7.4%	0.6%	0.3%	0.9%
Population, Deschutes Cty	182,930	93.3%	7.7%	0.5%	1.2%	0.6%
Population, Jefferson Cty	23,190	70.9%	19.6%	1.0%	0.8%	17.7%
Population, 3 Counties Combined	228,225	90.1%	8.9%	0.5%	1.1%	2.4%
Regional Public Transportation Advisory Committee	17	88%	0%	0%	0%	12%

*Population Research Center, College of Urban and Public Affairs, Portland State University

**American Community Survey 5-Year Estimates (2011-2015)

VIII. Title VI Investigations, Complaints 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. This list shall be included in the Title VI Program submitted to FTA every three years.

As shown below, COIC has received no discrimination complaints, has conducted no discrimination investigations and has not been named in any discrimination lawsuits over the last three years.

Body	7/1/17 – 6/30/18	7/1/18 – 6/30/19	7/1/19 – 6/30/20	Total for the Last 3 Years
Discrimination Complaints Received	0	0	0	0
Discrimination Complaints Investigated	0	0	0	0
Discrimination Lawsuits COIC Has Been Named In	0	0	0	0

IX. Subrecipient Compliance with Title VI

COIC does not have any subrecipients or plans to have any in the next three years. COIC shall develop a process for monitoring the efforts of a subrecipient to ensure compliance with Title VI before establishing a subrecipient.

ATTACHMENT A

Languages Spoken by Limited English Proficient (LEP) by County. Source:
U.S. Census Bureau, 2013 American Community Survey

	Total Population	Total LEP	Language 1 (name)	Language 1 (# LEP)	Language 1 (LEP % of total pop)
Crook County	19,868	335	Spanish	309	1.69%
Deschutes County	151,246	3,770	Spanish	3,130	2.49%
Jefferson County	19,933	1,213	Spanish	1,201	6.09%

US Department of Justice - Civil Rights Division (Federal Coordination and Compliance) website http://www.lep.gov/demog_data/demog_data and clicking on the "Download County Level Data" link (towards the top right corner)

ATTACHMENT B

Notifying the Public of Rights Under Title VI

CASCADES EAST TRANSIT

- The Central Oregon Intergovernmental Council (COIC) operates Cascades East Transit 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 COIC.
- For more information on the Cascades East Transit civil rights program, and the procedures to file a complaint, contact the COIC Outreach and Engagement Administrator at 541-548-9534 (TTY 800-735-2900); email dhofbauer@coic.org; or visit our administrative office at 1250 Bear Creek Road, Bend, OR 97701. For more information, visit www.cascadeseasttransit.com
- If information is needed in another language, contact 541-385-8680.

Notificando al Publico sobre Derechos Bajo Titulo VI

CASCADES EAST TRANSIT

- El Consejo Intergubernamental De Oregon Central (COIC por sus siglas en ingles) opera el sistema de transito East Cascade (CET por sus siglas en ingles) sin consideracion hacia raza, color, y origen nacional de acuerdo con Titulo VI del Acto De Derechos Civiles. Cualquier persona quien cree que ella or el ha sido agraviado o perjudicado por cualquiera practica discriminatoria ilegal bajo el Titulo VI puede radicar una queja con COIC.
- Para mas informacion sobre el programa de los Derechos Civiles de CET y los procedimientos para radicar una queja contacte al Administrador de Alcance y Compromiso de COIC a 541-548-9534 (TTY 8007352900); correo electronico dhofbauer@coic.org; o visite nuestra oficina administrativa a 1250 de la Calle Bear Creek, Bend, OR. Para mas informacion visite en linea www.cascadeseasttransit.com.
- Si se necesita informacion en una otra idioma, por favor llame a 5413858680

ATTACHMENT C

CASCADES EAST TRANSIT (CET) NONDISCRIMINATION COMPLAINT PROCEDURES

These procedures apply to all complaints filed under Title VI of the Civil Rights Act of 1964, relating to any program or activity administered by COIC/CET or its sub- recipients, consultants and/or contractors. Intimidation or retaliation of any kind is prohibited by law.

These procedures do not deny the right of the complainant to file formal complaints with other State or Federal agencies, or to seek private counsel for complaints alleging discrimination. These procedures are part of an administrative process that **does not provide for remedies that include punitive damages or compensatory remuneration for the complainant.**

Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation meeting(s) between the affected parties and the Title VI Compliance Manager may be utilized for resolution, at any stage of the process. The Title VI Compliance Manager will make every effort to pursue a resolution of the complaint. Initial interviews with the complainant and the respondent will request information regarding specifically requested relief and settlement opportunities.

Procedures.

1. Any individual, group of individuals, or entity that believes they have been subjected to discrimination prohibited by Title VI nondiscrimination provisions may file a written complaint within 180 calendar days of the alleged occurrence or when the alleged discrimination became know to the complainant. The complaint must meet the following requirements:
 - a. Complaint may be voice in person at either Hawthorne Station (334 Hawthorne Ave Bend, OR 97701) or CET's Redmond's office (343 NE Antler Ave Redmond, OR 97756) to a CET employee. However, CET asks the individual to follow up with the actions required in Section 1b below.
 - b. Complaint shall be in writing and signed by the complainant(s).
 - c. Include the date of the alleged act of discrimination (date when the complainant(s) became aware of the alleged discrimination; or the date on which that conduct was discontinued or the latest instance of the conduct.
 - d. Present a detailed description of the issues, including names and job titles of those individual perceived as parties in the complained-of incident.
 - e. Allegations received by fax or e-mail will be acknowledged and processed, once the identity(ies) of the complainant(s) and the intent to proceed with the complaint have been established. **The complainant is required to mail a signed, original copy of the fax transmittal or hard copy of the email sent for CET to be able to process it.**

- f. Allegations received by telephone will be reduced to writing and provided to complainant for confirmation or revision before processing. **A complaint form will be forwarded to the complainant for him/her to complete, sign, and return to CET for processing.**
2. Upon receipt of the complaint, the Title VI Compliance Manager will determine its jurisdiction, acceptability, and need for additional information, as well as investigate the merit of the complaint. In cases where the complaint is against one of CET's sub-recipients of Federal funds, CET will assume jurisdiction and will investigate and adjudicate the case. Complaints against CET will be referred to the Federal Transit Administration, Office of Civil Rights, for proper disposition pursuant to their procedures.
3. In order to be accepted, a complaint must meet the following criteria:
 - a. The complaint must be filed within 180 calendar days of the alleged occurrence or when the alleged discrimination became known to the complainant.
 - b. The allegation(s) must involve a covered basis such as race, color, or national origin.
 - c. The allegation(s) must involve a program or activity of a Federal-aid recipient, sub-recipient, or contractor.
4. A complaint may be dismissed for the following reasons:
 - a. The complainant requests the withdrawal of the complaint.
 - b. The complainant fails to respond to requests for additional information needed to process the complaint.
 - c. The complainant cannot be located after reasonable attempts.
5. Once CET decides to accept the complaint for investigation, the complainant and the respondent will be notified in writing of such determination within seven (7) calendar days. The complaint will receive a case number and will then be logged into CET's records identifying its basis.
6. In cases where CET assumes the investigation of the complaint, CET will provide the respondent with the opportunity to respond to the allegation(s) in writing. The respondent will have ten (10) calendar days from the date of CET written notification of acceptance of the complaint to furnish his/her response to the allegation(s).
7. CET's final investigative report and a copy of the complaint will be forwarded to the Federal Transit Administration, Office of Civil Rights, and affected parties within sixty (60) calendar days of the acceptance of the complaint.

8. CET will notify the parties of its final decision.
9. If complainant is not satisfied with the results of the investigation of the alleged discrimination and practices the complainant will be advised of the right to appeal to the Federal Transit Administration, Office of Civil Rights.

CASCADES EAST TRANSIT (CET POR SUS SIGLAS EN INGLES) PROCIDIMIENTOS
PARA QUEJAS DE NO-DESCRIMEN

Estos procedimientos aplican a todas las quejas presentadas bajo Título VI de la Ley de Derechos Civiles de 1964, relativas a cualquiera programa o actividad administrada por COIC/CET o sus subreceptores, consultants y/o contratistas. Se prohíbe por la ley intimidación o represalias de cualquier índole.

Estos procedimientos no niegan el derecho del demandante para entablar quejas formales con otras agencias Federales o Estatales, o buscar consejo privado para quejas alegando descrimen. Estos procedimientos son parte de un proceso administrativa **que no provee remedios que incluyen danos punitivos o remuneración compensatorio para el demandante.**

Se hará todo lo posible para obtener una resolución temprana de las quejas en el nivel más bajo posible. El opción de citas de mediación informal ente los partidos afectados y el Gerente de Cumplimiento del Título VI podría ser utilizado en cualquiera etapa del proceso. El Gerente de Cumplimiento del Título VI hará todo esfuerzo para perseguir una resolución de la queja. Entrevistas iniciales con el Demandante y el demandado pedirán información en relación con oportunidades solicitados para compensación y acuerdo.

Procidimientos.

1. Cualquier individuo, grupo de individuos, o entidad quien cree que ha(n) sido sujetos a descrimen prohibido por los provisiones del Titutlo VI No-Descrimen pueden entablar una queja escrita dentro de 180 días del incidente o cuando el demandante tomó conciencia del descrimen alegado. **La queja** debe cumplir con los siguientes requisitos:
 - a. La queja debe estar en escritura y firmado por el demandante
 - b. Incluir la fecha del acto alegado de descrimen; (fecha en cuando el demandante tomó conciencia de descrimen alegado o la fecha en la que dicha conducta fue discontinuada o la última incidencia de la conducta.
 - c. Presentar un descripción detallado de los asuntos o problemas, incluyendo nombres y títulos de empleo de los individuales percibidos como partidos en el incidente quejado.
 - d. Alegaciones recibidos por fax o por correo electrónico serán reconocidos y procesados una vez se han establecido el (los) identidad(es) de los(las) Demandantes y el intención de proceder con la queja. Se requiere que el(la) demandante envíe por correo, una copia original del transmisión del fax una copia dura del email para que CET lo pueda procesar.
 - e. Alegaciones recibidos por teléfono serán reducidos a escritura y provistos al demandante por confirmación o revisión antes de procesarse. Al demandante se le adelantará una forma de queja para el/ella completar, firmar y devolver a CET para procesamiento.

2. Al recibir la queja, El Gerente de Cumplimiento del Título VI determinara su jurisdicción, aceptabilidad, y necesidad para información adicional, así como investigar el mérito de la queja. En casos donde la queja es contra uno de los subreceptores de fondos federales de CET, CET asumirá jurisdicción, investigará y adjudicará el caso. Las quejas contra CET serán referidos al Administración Federal de Tránsito, Oficina de Derechos Civiles para disposición propia según sus procedimientos.
3. A fin de aceptarse, una queja debe seguir con los siguientes criterios:
 - a. La queja debe ser entablado dentro de 180 días del incidente alegado cuando el demandante tomó conciencia del descrimen alegado.
 - b. El(los) alegación(es) deben involucrar un base cubierto tal como raza, color o origen nacional.
 - c. El(los) alegación(es) deben involucrar una programa o actividad de un receptor de ayuda Federal, subreceptor o contratista.
4. Una queja puede ser desestimada para los siguientes razones:
 - a. El demandante pide el retiro de la queja.
 - b. El demandante falla en responder a las solicitudes para más información.
 - c. No se puede localizar al demandante después de intentos razonables.
5. Una vez CET decide aceptar la queja para investigación, se les notificará al demandante y al respondiente por escrito sobre dicha determinación dentro de siete(7) días calendario. El demandante recibirá un número de caso y entonces será registrado en los registros de CET para identificar su base.
6. En casos donde CET asume la investigación de la queja, CET le proveerá al respondiente con la oportunidad de responder al (los) alegación(es) por escrito. El respondiente tendrá diez(10) días calendario a partir de la fecha de la notificación de la aceptación de la queja para preparar su respuesta al (los) alegación(es).
7. Se adelantará tanto una copia del informe investigativo de CET como una copia de la queja al Administración Federal De Tránsito, Oficina De Derechos Civiles, y los partidos afectados dentro de sesenta(60) días calendario de la aceptación de la queja.
8. CET se les notificará a los partidos sobre su decisión final.
9. Si el Demandante no está satisfecho con los resultados de la investigación del descrimen alegado y prácticas, el demandante será notificado del derecho de recurrir al Administración Federal De Tránsito, Oficina De Derechos Civiles.

Title VI Complaint Form (cont.)

List names and contact information of persons who may have knowledge of the alleged discrimination:

Have you filed this complaint with any other federal, state, or local agency, or with a federal or state court? Check all that apply.

Federal Agency _____ Federal Court _____ State Court _____
State Agency _____
Local Agency _____

Please provide information about contact person at the agency/court where the complaint was filed.

Name: _____
Address: _____
City/State/Zip: _____
Telephone Number (Work): _____

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

Complainant Signature Date

Attachments: Yes _____ No _____

Submit form and any additional information to:

Cascades East Transit/COIC
Title VI Compliance Manager
1250 NE Bear Creek Road
Bend, OR 97701
Phone: (541) 548-9543
Fax: (541) 923-3416

Forma De Queja De Titulo VI

Nota: Se necesita el siguiente informacion para asistirnos en procesar su queja.

Informacion del Demandante

Nombre: _____
Direccion: _____
Ciudad/Estado/Zona Postal: _____
Numero de Telefono (Casa): _____
Numero de Telfono (Trabajo): _____

Persona quien fue discriminada en su contra (alguen o una persona otraque el demandante)

Nombre: _____
Direccion: _____
Ciudad/Estado/Zona Postal: _____
Numero de Telefono (Casa): _____
Numero de Telefono (Trabajo): _____

Cual de lo siguiente describe lo major la razon que usted piensa que tomo lugar el descrimen.

Raza/Color (Especifique): _____ Origen Nacional (Especifique): _____
Genero/Edad (Especifique): _____ Deshabilidad: _____

En cual(es) fecha(s) ocurrio el descrimen alegado: _____

Describe el descrimen alegado. Explique lo que paso y quien usted piensa fue responsable (si se necesita mas espacio, agregue una hoja de papel):

Forma de Queja de Titulo VI (cont.)

Liste los nombres y informacion de contacto de personas quienes podrian tener conocimiento del descrimen alegado:

Has radicado una queja con cualquiera otra agencia federal, estatal o agencia local, o con un tribunal federal o estatal. Tilde todos los que aplican.

Agencia Federal _____
Agencia Estatal _____
Agencia Local _____

Tribunal Federal _____
Tribunal Estatal _____

Por favor provee informacion sobre la persona de contacto en el tribunal/agencia donde se radico la queja.

Nombre: _____
Dirreccion: _____
Ciudad/Estado/Zona Postal: _____
Numero de Telefono (Trabajo): _____

Por favor de firmar abajo. Usted podria adjuntar cualesquiera materials escritas o informacion que tu piensas que sean relevantes a suqueja.

Firma del Demandante _____
Fecha _____

Anexos: Si _____ No _____

Somete esta forma y cualquier informacion adicional a:

Cascades East Transit/COIC
Title VI Compliance Manager
1250 de la Calle Bear Creek
Bend, Oregon 97701
Telefono (541) 548-9543
Fax: (541) 923-3416

ATTACHMENT F

CASCADES EAST TRANSIT



***Public Information Concerning
Title VI of the Civil Rights Act of 1964, as amended***

Cascades East Transit (CET) administered by Central Oregon Intergovernmental Council (COIC) is the recipient of Federal funding to provide public transportation. CET operates programs subject to the nondiscrimination requirements under Title VI.

The following examples, without being exhaustive, illustrate the application of the nondiscrimination provisions of the part to projects receiving Federal financial assistance under the programs of certain Department of Transportation operating administrations.

- Any person who is, or seeks to be, a patron of any public vehicle which is operated as a part of, or in conjunction with, a project shall be given the same access, seating, and other treatment with regard to the use of such vehicle as other persons without regard to their race, color, national origin, age, gender or disability.
- No person who is, or seeks to be an employee of the project sponsor or lessees, concessionaires, contractors, licensees, or any organization furnishing public transportation service as a part of, or in conjunction with, the project shall be treated less favorably than any other employee or applicant with regard to hiring, dismissal, advancement, wages, or any other conditions and benefits of employment, on the basis of race, color, national origin, age, gender or disability.
- No person or group of persons shall be discriminated against with regard to the routing, scheduling, or quality 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, national origin, age, gender or disability.
- 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, age, gender or disability.

The following Title VI information/documents are available on the system's website or upon request: CET's Title VI Policy and Program, FTA Circular 4702.1A, 49 CFR Part 21. To obtain Title VI information/documents, please call (541) 699-4094 or visit www.cascadeseasttransit.com.

Individuals or organization who believe they have been denied the benefits of, excluded from participation in, or subject to discrimination on the grounds of race, color, national origin, age, gender or disability by Cascades East Transit (CET) can file an administrative complaint with CET and/or the Federal Transit Administration's Office of Civil Rights under Title VI of the Civil Rights Act of 1964. Individuals and organizations may file a complaint by completing the Title VI complaint form. A copy of the complaint form and procedures can be found on the CET website at www.cascadeseasttransit.com or by calling (541) 385-8680.

CASCADES EAST TRANSIT

Informacion publico relativo al

Titulo VI de la Ley De Derechos Civiles de 1964, segun enmendada



Cascades East Transit (CET) administrado por el Consejo Intergubernamental de Oregon Central (COIC por sus siglas en ingles) es el recipiente de financiacion federal para proveer transportacion public. CET opera programas sujetas a los requisitos de No-Describen bajo el Titulo VI.

Los siguientes ejemplos, sin ser exhaustivos, ilustran el aplicacion de provisiones Anti- Describen del parte de proyectos recibiendo asistencia financiera federal bajo los programas de administraciones operativos Del Departamento De Transportacion.

- Cualquiera persona quien es, o busca ser, un cliente de cualquier vehiculo publico el cual es operado como parte de, o junto con, un proyecto debe ser dado el mismo acceso, acceso a asientos y otro tratamiento con respecto al uso de dicho vehiculo como otras personas sin considerar su raza, color, origen nacional, edad, genero o deshabilidad.
- Ninguna persona quien es, o busca ser un empleado del patroncinador del proyecto o arrendatarios, concesionarios, titulares de lincencia, o cualquier organizacion que depre transportacion public como parte de, o junta con, el proyecto, puede ser tratado menos favorable que cualquier otro empleado o solicitante con respecto a contratacion, despido, promocion, salario, o cualesquiera otros condiciones y beneficios del empleo, sobre la base de raza, color, origen nacional, edad, genero o deshabilidad.
- No se puede discriminar contra cualquiera persona relative al planificacion de la ruta, programacion o cladidad de del servicio de transportacion deparado como parte del proyecto sobre la base de raza, color, origen nacional. No se puede determinar la frecuencia de servicio, edad y calidad de vehiculos asignados a rutas, calidad de estaciones sirviendo rutas diferentes y locacion derutas sobre la base de color, origen nacional, edad, genero y deshabilidad.
- No se puede determinar l locacion de proyectos requiriendo adquisiciones de tierra y el desplazamiento de personas de sus residencias y negocios sobre la base de raza, color, origen nacional, edad, genero o deshabilidad

El siguiente informacion/documentos de Titulo VI son disponibles en el sitio web del sistema o al solicitar: La politica y programa de Titulo VI de CET, FTA Circular 4702.1A, 49 Del Parte 21 Del Codigo Federal De Regulaciones. Para obtener informacion/documentos de Titulo VI, por favor llame al (541)699-4094 o visite www.cascadeseasttransit.com.

Individuos o organizaciones quienes creen que han sido negados los beneficios de, o excluidos de participacion en, o sujetos al descrimen sobre la base de raza, color, origen nacional, edad, genero deshabilidad por Cascades East Transit (CET) pueden entablar una queja administrativa con CET y/o La Oficina De Derechos Civiles Del Administracion Federal De Transito bajo Titulo VI De La Ley De Derechos Civiles de 1964. Individuos o organizaciones pueden entablar una queja por completar la forma de queja De Titulo VI. Se puede encontrar una copia de la forma de queja y procedimientos en sitio web de CET a www.cascadeseasttransit.com o por llamar al (541)385-8680.