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Federal Transit Administration
Title VI Program

Cascades East Transit (CET) operated by Central Oregon Intergovernmental Council (COIC)

Approved October 2, 2025

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Title VI Plan Table of Contents

The Cascades East Transit Title VI plan includes the following elements:

1. Plan Approval and Compliance Requirements
2. Policy Statement and Objectives
3. Notice to the Public
4. Complaint Procedure and Form
5. Public Participation Plan
6. Language Assistance Plan
7. Minority Representation Information
8. Providing Assistance to and Monitoring Subrecipients
9. Title VI Equity Analysis for Facility Acquisition
10. Fixed Route Transit Provider Service Standards and Policies

Docusign Envelope ID: 8AFC8A38-3B60-4F5A-BFD0-9CD0FC58BB06

Section 1: Title VI Plan Approval & Compliance Requirements

Cascades East Transit, operated by Central Oregon Intergovernmental Council, agrees to maintain this Title VI plan as the public transportation service provider for the region. This Title VI plan has been approved by the Central Oregon Intergovernmental Council's Board of Directors on October 2, 2025, and has been distributed to Deschutes County, Jefferson County, the Confederated Tribes of Warm Springs, the City of Redmond, the City of Sisters, the City of Madras, and the City of Prineville for acceptance and approval by their respective governing bodies.

This plan is valid for three years from the date of approval by the COIC Board of Directors.

CENTRAL OREGON INTERGOVERNMENTAL COUNCIL BOARD OF DIRECTORS

Signed by:
Mike Riley
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Mike Riley, Board Chair **Date**

Annual Certifications and Assurances

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with Title VI regulations. This requirement shall be fulfilled when the applicant/recipient submits its annual certifications and assurances. Primary recipients will collect Title VI assurances from subrecipients prior to passing through FTA funds.

Cascades East Transit will remain in compliance with this requirement by annual submission of certifications and assurances as required by the state department of transportation.

The date of last submission of these certifications and assurances (at the time of this Plan's approval) is: **September 17, 2025**

Docusign Envelope ID: 8AFC8A38-3B60-4F5A-BFD0-9CD0FC58BB06

Section 2: Title VI Policy Statement & CET Objectives

Policy Statement

Cascades East Transit, operated by Central Oregon Intergovernmental Council, as a recipient of Federal Transit Administration (FTA) grant dollars either directly from FTA or through the Oregon Department of Transportation, will comply with the Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the U.S. Department of Transportation implementing regulations, FTA Circular 4702.1B, and Oregon Public Transportation requirements as specified in Master Grant Agreement, and State Management Plan. Cascades East Transit operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act.

Cascades East Transit maintains a list or log of all Title VI investigations, complaints and lawsuits, pertaining to its transit-related activities.

Objectives

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

a) Ensure that the level and quality of public transportation service is provided in a nondiscriminatory manner.
b) Promote the full and fair participation in public transportation decision-making without regard to race, color, or national origin.
c) Ensure meaningful access to transit-related programs 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.

Docusign Envelope ID: 8AFC8A38-3B60-4F5A-BFD0-9CD0FC58BB06

Section 3: Title VI Notice to the Public

Cascades East Transit's notice to the Public is as follows:

Notifying the Public of Rights Under Title VI

Cascades East Transit

Cascades East Transit operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act of 1964. Any person who believes they have been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Cascades East Transit.

For more information on Cascades East Transit's civil rights program, the procedures to file a complaint, or to file a complaint, please contact **Robert Townsend, Transportation Director** at **541-385-8680**, **(TTY 800-735-2900)**; email cet.comments@coic.org; or visit our administrative office at **334 NE Hawthorne Avenue, Bend, OR 97701**. For more information, visit **www.cascadeseasttransit.com**.

For transportation-related Title VI matters, a complaint may also be filed directly with the:

- Oregon Department of Transportation, Office of Equity and Civil Rights, 800 Airport Road SE, Salem, OR 97301-4792
- Federal Transit Administration, Office of Civil Rights, Attention: Complaint Team, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

If information is needed in another language, contact **541-385-8680**.

Cascades East Transit's Notice to the Public is posted inside the transit vehicles and in the following areas available to the public:

1. Hawthorne Station, 334 NE Hawthorne Avenue, Bend, OR 97701
2. Redmond Transit Hub, 777 SW Kalama Avenue, Redmond, OR 97701
3. City of Madras City Hall, 125 SW E Street, Madras, OR 97741
4. City of Prineville City Hall, 387 NE Third Street, Prineville, OR 97754
5. City of Sisters City Hall, 520 E Cascade Avenue, Sisters, OR 97759
6. Deschutes County Administration Building, 1300 NW Wall Street, Bend, OR 97703
7. Jefferson County Annex, 66 SE D Street, Madras, OR 97741
8. Confederated Tribes of Warm Springs, 1233 Veterans Street, Warm Springs, OR 97761

Docusign Envelope ID: 8AFC8A38-3B60-4F5A-BFD0-9CD0FC58BB06

Notificación al público de derechos bajo el Título VI

Cascades East Transit

Cascades East Transit opera sus programas y servicios sin distinción de raza, color y origen nacional, según el Título VI de la Ley de Derechos Civiles. Cualquier persona que crea que ha sido perjudicada por alguna práctica discriminatoria ilegal bajo el Título VI puede presentar una queja con Cascades East Transit.

Para obtener más información sobre el programa de derechos civiles de Cascades East Transit, los procedimientos para presentar una queja o para presentarla, por favor llame a **Robert Townsend, Director de Transporte**, **541-385-8680**, **(TTY 800-735-2900)**, correo **cet.comments@coic.org** o visite nuestra oficina administrativa en **334 NE Hawthorne Avenue, Bend, OR 97701**. Para más información, visite **www.cascadeseasttransit.com**.

Para asuntos del Título VI relacionados con el transporte, también se puede presentar una queja directamente ante:

- El Departamento de Transporte de Oregón, Oficina de Equidad y Derechos Civiles, 800 Airport Road SE, Salem, OR 97301-4792

- La Administración Federal de Tránsito, Oficina de Derechos Civiles, Atención: Equipo de Quejas, East Building, 5th Floor-TCR, 1200 New Jersey Avenue, SE Washington, DC 20590.

Si se necesita información en otro idioma, comuníquese con **541-385-8680**.

El aviso al público de Cascades East Transit se publica dentro de los vehículos de tránsito y en las siguientes áreas disponibles para el público:

1. Estación Hawthorne, 334 NE Hawthorne Avenue, Bend, OR 97701
2. Centro de Tránsito de Redmond, 777 SW Kalama Avenue, Redmond, OR 97701
3. Ayuntamiento de la Ciudad de Madras, 125 SW E Street, Madras, OR 97741
4. Ayuntamiento de la Ciudad de Prineville, 387 NE Third Street, Prineville, OR 97754
5. Ayuntamiento de la Ciudad de Sisters, 520 E Cascade Avenue, Sisters, OR 97759
6. Edificio de Administración del Condado de Deschutes, 1300 NW Wall Street, Bend, OR 97703
7. Anexo del Condado de Jefferson, 66 SE D Street, Madras, OR 97741
8. Tribus Confederadas de Aguas Termales, 1233 Veterans Street, Warm Springs, OR 97761

Docusign Envelope ID: 8AFC8A38-3B60-4F5A-BFD0-9CD0FC58BB06

Section 4: Title VI Complaint Procedure

Cascade East Transit's Title VI Complaint Procedure and Form is made available in the following locations:

1. Agency website: **www.cascadeseasttransit.com**
2. Hard copy in the administration office at Hawthorne Station, 334 NE Hawthorne Avenue, Bend, OR 97701
3. Agency Title VI Plan

CASCADES EAST TRANSIT

NONDISCRIMINATION COMPLAINT PROCEDURES

For Title VI of the Civil Rights Act of 1964 and Americans with Disabilities Act

These procedures apply to all complaints filed under Title VI of the Civil Rights Act of 1964 and the Americans with Disabilities Act of 1990 as amended, relating to any program or activity administered by 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/ADA Compliance Officer, may be utilized for resolution, at any stage of the process. The Title VI/ADA Compliance Officer 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 known to the complainant. The complaint must meet the following requirements:
    a. Complaint shall be in writing and signed by the complainant(s) or provided via telephone to a call center staff member.
    b. 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.
    c. Present a detailed description of the issues, including names and job titles (if available) of those individuals perceived as parties to the alleged incident.
    d. Complaints must be submitted in writing, or via telephone to be accepted.

Docusign Envelope ID: 8AFC8A38-3B60-4F5A-BFD0-9CD0FC58BB06

Complaints may be submitted via the online complaint form, email, fax, or mail. Contact details for submitting complaints are provided at the bottom of the complaint form.

e. Complaints received by telephone will be notated in writing by the call-taker and will follow the same process as complaints submitted in writing. If requested, 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/ADA Compliance Officer 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. In cases where a conflict of interest may arise, complaints against CET will be referred to the Federal Transit Administration, Office of Civil Rights, for proper disposition pursuant to their procedures.
3. To be accepted, a complaint must meet **all** 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 disability, race, color, national origin, or disability.
    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 complaint does not meet criteria for acceptance.
    b. The complainant requests the withdrawal of the complaint.
    c. The complainant fails to respond to requests for additional information needed to process the complaint.
    d. The complainant cannot be located after reasonable attempts.
5. Once CET has accepted 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.
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 in writing of its final decision within sixty (60) calendar days. Detailed nondiscrimination complaint files are maintained for three years. A summary of all nondiscrimination complaints received is maintained permanently.
9. Complainants have the right to contact the Federal Transit Administration, Office of Civil Rights, 915 Second Avenue, Suite 3142, Seattle, WA 98174-1002. If a complainant is not satisfied with the results of the investigation of the alleged discrimination and practices, the complainant can appeal the decision to the Federal Transit Administration, Office of Civil Rights.

Docusign Envelope ID: 8AFC8A38-3B60-4F5A-BFD0-9CD0FC58BB06

Title VI/ADA Complaint Form

Please provide as much information as possible to assist in processing your complaint.

Complainant's Information:

Name:_____

Address:_____

City/State/Zip:_____

Telephone Number (Home): _____

Telephone Number (Work): _____

Person Discriminated Against (if someone other than complainant):

Name:_____

Address:_____

City/State/Zip:_____

Telephone Number (Home): _____

Telephone Number (Work): _____

Which of the following best describes the reason you believe the discrimination took place? Please circle all that apply:

Race Color National Origin Disability

Other (please specify): _____

On what date(s) did the alleged discrimination take place: _____

Describe the alleged discrimination. Explain what happened and whom you believe was responsible (if additional space is needed, add a sheet of paper):

Docusign Envelope ID: 8AFC8A38-3B60-4F5A-BFD0-9CD0FC58BB06

Title VI Complaint Form (cont.)

List names and contact information of people 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? Circle all that apply.

Federal Court State Court Federal Agency State Agency Local Agency

Plea*se provide information about the contact person at the agency/court where the complaint was filed.*

Name:_____

Address:_____

City/State/Zip:_____

Telephone Number:_____

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:

Via mail: Cascades East Transit
Title VI Compliance Officer
343 E Antler Avenue
Redmond, OR 97756

Via Email: cet.comments@coic.org

Via Fax: (541) 548-9548

Via Phone: (541) 385-8680

Via our website: www.cascadeseasttransit.com/contact/

If you need this information in another language, contact (541) 385-8680. ***Si necesita información en otro idioma, favor de llamar al (541) 385-8680.***

Docusign Envelope ID: 8AFC8A38-3B60-4F5A-BFD0-9CD0FC58BB06

Section 5: Public Participation Plan

Strategies and Desired Outcomes

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.

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. Materials are printed in English and in Spanish.
- 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

Docusign Envelope ID: 8AFC8A38-3B60-4F5A-BFD0-9CD0FC58BB06

given contact information to request assistance such as assisted listening devices, a sign language interpreter, or materials in alternate formats.

- CET staff regularly performs surveying work on buses, as well as stations, to better understand customer needs.

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 Deschutes 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 as defined in CET's fare and service change policy. 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

Docusign Envelope ID: 8AFC8A38-3B60-4F5A-BFD0-9CD0FC58BB06

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 also tracks the number of outreach events performed each year. 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.

Section 6: Language Assistance Plan

Plan Components

As a recipient of federal US DOT funding, Cascades East Transit is required to take reasonable steps to ensure meaningful access to our programs and activities by people with limited English proficiency (LEP).

LEP refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. This includes those who have reported to the U.S. Census that they speak English less than very well, not well, or not at all.

Cascades East Transit's Language Assistance Plan includes the following elements:

1. The results of the *Four Factor Analysis*, including a description of the LEP populations served.
2. A description of how language assistance services are provided, broken down by language.
3. A description of how LEP persons are informed of the availability of language assistance service.
4. A description of how the language assistance plan is monitored and updated.
5. A description of how employees are trained to provide language assistance to LEP persons.

Four Factor Analysis Methodology

To determine if an individual is entitled to language assistance and what specific services are appropriate, Cascades East Transit has conducted a *Four Factor Analysis* of the following areas: 1) LEP speaker demography, 2) contact frequency, 3) importance of service, and 4) resources and costs.

Docusign Envelope ID: 8AFC8A38-3B60-4F5A-BFD0-9CD0FC58BB06

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient. In addition to the number or proportion of LEP persons served, Cascades East Transit will identify:

(a) How LEP persons interact with the recipient's agency.

(b) Identification of LEP communities. CET will assess the number or proportion of LEP persons from each language group to determine the appropriate language services for each language.

(c) The literacy skills of LEP populations in their native languages, in order to determine whether translation of documents will be an effective practice; and

(d) Whether LEP persons are underserved by the recipient due to language barriers.

Factor 2: The frequency with which LEP persons come into contact with the program. CET will identify and assess the frequency with which staff come into contact with LEP persons. Examples of contact could include:

(a) Use of bus and paratransit service;
(b) Purchase of tickets in person at Hawthorne Station, or through vending machines, outlets, websites, and over the phone;
(c) Participation in public meetings;
(d) Customer service interactions;
(e) Ridership surveys;
(f) Operator surveys.

Factor 3: The nature and importance of the program, activity, or service provided by the program to people's lives. Generally speaking, the more important the program, the more frequent the contact and the likelihood that language services will be needed.

Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach. Resource and cost issues can often be reduced by technological advances, reasonable business practices, and the sharing of language assistance materials and services among and between recipients, advocacy groups, LEP populations and Federal agencies.

Item #1 – Results of the Four-Factor Analysis

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered.

Cascades East Transit provides public transportation services in Deschutes, Jefferson, and Crook Counties. Crook County has prepared their own Title VI plan with a four-factor analysis that covers their county, so this plan will cover Deschutes and Jefferson Counties, but will still include Crook County's data to show CET's service area overall. Data was obtained from the US Census website located here: https://data.census.gov/table/ACSDT5Y2023.C16001?q=C16001&g=050XX00US41013,41017,41031&y=2023&moe=false and is broken down by County.

Of the 241,202 residents in CET's service area, 5,728 residents describe themselves as speaking English **"less than very well".** People that speak Spanish are the primary LEP persons likely to utilize CET's services. For CET's service area, the latest U.S. Census Bureau data shows that among the area's population, 2.38% speak English ***"less than very well."*** For these groups who speak English "less than very well", the various breakdowns are shown in the charts below.

Docusign Envelope ID: 8AFC8A38-3B60-4F5A-BFD0-9CD0FC58BB06

Total Population by County

County	Total Population
Crook	24,348
Deschutes	193,394
Jefferson	23,460
Total	241,202

Primary Language Spoken of Persons Who Speak English "Less Than Very Well" in CET's Service Area

Language Spoken	Percentage of Tri-County Population	Number of People in the Tri-County Area
Spanish	1.966%	4,742
German or Other West Germanic	0.092%	221
Russian, Polish, or Other Slavic	0.090%	218
Other Asian and Pacific Island	0.074%	179
Chinese	0.062%	150
Other Indo-European	0.033%	80
French or French Creole	0.027%	64
Tagalog	0.011%	27
Other and Unspecified	0.010%	25
Vietnamese	0.005%	12
Korean	0.004%	10
Total	**2.375%**	**5,728**

Docusign Envelope ID: 8AFC8A38-3B60-4F5A-BFD0-9CD0FC58BB06

Primary Language Spoken of Persons Who Speak English "Less Than Very Well" in Deschutes County

Language Spoken	Percentage of Deschutes County Population	Number of People in Deschutes County
Spanish	1.771%	3,425
Russian, Polish, or Other Slavic	0.113%	218
Chinese	0.078%	150
German or Other West Germanic	0.076%	147
Other Asian and Pacific Island	0.072%	139
Other Indo-European	0.041%	80
French or French Creole	0.033%	64
Tagalog	0.014%	27
Korean	0.005%	10
Total	2.203%	4,260

Primary Language Spoken of Persons Who Speak English "Less Than Very Well" in Jefferson County

Language Spoken	Percentage of Jefferson County Population	Number of People in Jefferson County
Spanish	4.122%	967
Other Asian and Pacific Island	0.171%	40
Other and Unspecified	0.107%	25
German or Other West Germanic	0.094%	22
Total	4.493%	1,054

Primary Language Spoken of Persons Who Speak English "Less Than Very Well" in Crook County

Language Spoken	Percentage of Crook County Population	Number of People in Crook County
Spanish	1.437%	350
German or Other West Germanic	0.214%	52
Vietnamese	0.049%	12
Total	1.700%	414

Docusign Envelope ID: 8AFC8A38-3B60-4F5A-BFD0-9CD0FC58BB06

The data in the tables above show that LEP persons who speak Spanish as their primary language **AND** speak English "less than very well", per the US Census records, surpass the safe harbor threshold of 1,000 people across CET's entire service area as well as within Deschutes County. Jefferson County's population of people who speak Spanish as their primary language **AND** speak English "less than very well" is close to meeting the safe harbor threshold for both number of persons and percentage, but falls shy of both metrics. Crook County does not have any LEP groups that surpass the safe harbor threshold of 1,000 persons, nor the LEP threshold of 5%.

The safe harbor threshold is met when the lesser of 1,000 people or 5% of the population is reached. When this threshold is met, COIC must translate vital documents into the languages that meet this threshold. COIC must provide the vital documents in Spanish in Deschutes County. However, CET's service area covers the Central Oregon region and many riders travel between counties on the system. Therefore, CET is committed to providing the Spanish translation of vital documents to all travelers, not just those in Deschutes County.

The vital documents provided for translation are:

1. The Title VI Public Notice
2. The Title VI Complaint Procedures
3. The Title VI Complaint Form

Other non-vital documents needed by Spanish speakers may be translated and provided upon request. Additionally, both vital and non-vital documents may be provided in other languages upon request.

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

CET assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. Spanish speaking LEP groups have been identified to have the most interactions with the agency based on call center data recording the languages spoken by callers. This data is based on the usage of the phone translation service used by customer service representatives. For the 2023-2024 fiscal year covering July 1, 2023 to June 30, 2024 the call center received 157 calls for a total of 1,246 minutes of phone translation services. Of the 157 calls, all 157 were for Spanish translation services. The remaining LEP groups listed in the table titled **Breakdown of Languages Spoken Other Than English in CET's Service Area** have very infrequent contact with the CET team based on the call center translation data. Bus drivers also come into contact with LEP persons. CET provides approximately 697,000 passenger trips per year. If an individual is unable to communicate with a bus driver due to language limitations, the driver will work with the call center's dispatchers and customer service representatives, if needed, to ensure the individual receives access to transit and free translation services as needed.

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

CET operates service in Deschutes, Crook, and Jefferson Counties. In addition, we serve the Confederated Tribes of Warm Springs. The public transportation services that CET provides help members of the community gain access to vital activities like food shopping, medical appointments, school, and work. Many of the communities within the CET service area are considered rural. This means there are limited medical services, stores, and work opportunities for the residents in these areas. In addition, these areas are often not walkable, are too unsafe to be traversed with mobility aids like wheelchairs and walkers and are impacted by adverse weather for portions of the year. The transportation that CET provides allows people living in our region to reach important services safely without being adversely impacted by remote locations or adverse weather.

Docusign Envelope ID: 8AFC8A38-3B60-4F5A-BFD0-9CD0FC58BB06

All of CET's programs are important; however, those related to safety, public transit, nondiscrimination and public involvement are among the most important. CET is committed to providing meaningful access and must publish and provide vital documents in Spanish for our riders. In addition, we are committed to providing written translation for both vital and non-vital documents for other languages that do not meet the safe harbor threshold. In other cases, CET will strive to provide alternative but meaningfully accessibility. Moreover, CET continually evaluates its programs, services, and activities to ensure that persons who may be LEP are always provided with meaningful access. The Title VI policy, complaint form, and LEP policy are available in Spanish upon request.

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

CET is committed to providing resources that allow LEP persons to navigate the public transit system in our region. Call center staff are trained to utilize a phone translation service, and we provide bilingual staff for callers who speak Spanish. We have dedicated staff who perform outreach services at events that help reach the Spanish-speaking population like Latino Fest, held in Jefferson County. We also publish notices in local media including newspapers, online news media, and social media regarding meetings and events where public comment is welcomed. The relative cost of providing outreach services is minimal and primarily consists of staff time. The phone translation service has a cost based on time used. In the year ending June 30, 2024 we spent approximately $1,700 on phone translation services. We are able to translate our documents for free using bilingual staff. The cost to make social media posts on CET's social media pages is free. However, the cost to publish notices in the newspaper, or to promote our posts on social media can cost anywhere from approximately $20 to $400. CET's highest cost for outreach comes from staff time needed for attending events.

CET makes every reasonable effort to make its programs, services, and activities accessible to LEP individuals. CET uses available resources, both internal and external, to accommodate reasonable requests for translations.

Item # 2 – Description of how Language Assistance Services are Provided, by Language

CET has identified, developed, and uses the following:

a) Vital document translation. All documents that are considered vital are translated into Spanish due to the number of Spanish-speaking LEP persons within our service area surpassing the safe harbor threshold of 1,000 people. The documents can also be translated into other languages upon request, or the information may be provided verbally. The documents that are translated into Spanish are:
    a. The Title VI Public Notice
    b. The Title VI Complaint Procedures
    c. The Title VI Complaint Form
b) CET employs bilingual staff in the call center and allows callers to be directed via phone tree to the bilingual customer service representatives. These staff members are generally Spanish-speaking.
c) CET's call center uses a translation service via phone call for all non-Spanish speaking LEP callers as needed. This service provides translation services for more than 100 languages including dialects. In cases where a caller is unable to connect with a Spanish speaking customer service representative, callers can be directed to the translation service as well.
d) Qualified interpreters are used, when necessary, particularly for large outreach projects like creating a transit master plan, or as requested.

Docusign Envelope ID: 8AFC8A38-3B60-4F5A-BFD0-9CD0FC58BB06

Item # 3 –	Description of how LEP Persons are Informed of the Availability of Language Assistance Service

To ensure that LEP individuals are aware of CET's language assistance measures, CET provides the following:

- The Title VI Program including the Language Assistance Plan is made available on the website with a hard copy in the central office.
- The notice to the public includes language translation contact information via the call center phone number and is translated into the languages identified in this Plan that meet the Safe Harbor threshold. This notice is posted in the buses and in the locations as listed on the public notice included in this plan.

Item # 4 – Description of how the Language Assistance Plan is Monitored and Updated

CET will continue to update the LAP as required by the US Department of Transportation. At a minimum, the Title VI Plan will continue to be reviewed and updated every three (3) years in conjunction with the Title VI submission and use data from the U.S. Decennial Census or the American Community Survey as available, or when it is clear that the concentrations of LEP individuals are present in the CET service area. The Title VI Coordinator is responsible for monitoring, evaluating, and updating the LAP as necessary. The Title VI Coordinator will use a variety of tools to monitor activity that may prompt LAP revisions. These tools include:

- Monitoring call center phone translation services to see which languages are being requested and the frequency in which these services are being used.
- Outreach efforts and events. These include general outreach where the event is not culture specific as well as events that are specific to certain cultures.
- Public comments. We provide a public comment period at our public meetings and we have a feedback form on our website where the public can submit comments. We also have staff that ride our bus routes and visit transit stations and hubs who receive feedback from the riders as well.
- Driver feedback. Drivers are able to provide feedback to their supervisors about ridership populations and the increased need for translation services and increased resources if necessary.

Updates will continue to include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether CET's financial resources are sufficient to fund the language assistance resources needed.
- Determine whether CET has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning CET's failure to meet the needs of LEP individuals.

Docusign Envelope ID: 8AFC8A38-3B60-4F5A-BFD0-9CD0FC58BB06

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

The following training will continue to be provided to all CET staff, including supervisors:

- Information on the CET Title VI Procedures and LEP responsibilities through PASS training annually.
- The National RTAP video on Title VI requirements for FTA grantees is provided every two years to all CET staff.
- Description of language assistance services offered to the public via training provided during onboarding.
- Documenting language assistance requests for call center staff at onboarding and as needed.
- Use of over-the-phone language interpretation services for call center staff at onboarding and as needed. Drivers are also trained on how to contact the call center staff when encountering riders who may need to use the phone interpreter services to communicate while navigating the transit system.
- How to handle a potential Title VI/LEP complaint for call center staff at onboarding.

Section 7: Minority Representation Information

Recipients that have **transit-related**, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

COIC's Board of Directors is comprised of elected officials from each local government entity in the region. Because this board is comprised of elected officials, the racial breakdown for this governing body is not included in the table below. COIC also facilitates the region's transit-related committees including the regional public transit advisory committee and the advisory committees for the local Statewide Transportation Improvement Fund (STIF) Qualified Entities (QEs). The members of these committees are appointed and the racial breakdown for the membership of those committees is included in the table below.

A. Minority Representation Table

Public Body	Total Voting Members	% Caucasian	% Hispanic	% African American	% Asian American	% Native American	% Two or More Races
Regional Public Transit Advisory Committee (RPTAC)	15	86%	7%	-	-	7%	
Deschutes County Statewide Transportation Improvement Fund (STIF) Advisory Committee	12	92%	-	-	-	-	8%
Crook County Statewide Transportation Improvement Fund (STIF) Advisory Committee	7	100%	-	-	-	-	-
Jefferson County Statewide Transportation Improvement Fund (STIF) Advisory Committee	6	83%	17%	-	-	-	-
Confederated Tribes of Warm Springs Statewide Transportation Improvement Fund (STIF) Advisory Committee	7	29%	-	-	-	71%	-

Table Depicting Membership of Non-Elected Committees Broken Down by Race

Docusign Envelope ID: 8AFC8A38-3B60-4F5A-BFD0-9CD0FC58BB06

B. Efforts to Encourage Minority Participation

COIC encourages members who are representative of CET's ridership to join the transit-related advisory committees. Open committee positions are advertised through social media and news media, and appointees must go through an application process to be selected. COIC makes an effort to appoint members of the public who reflect the region's public transit users to allow those users to have a voice in the local public transit system. This includes minorities, veterans, and people with disabilities. COIC also encourages members of the public to attend advisory committee meetings to share public comments regardless of whether they are members of the committee. All committee meeting schedules are available on the COIC website for the public to access.

Section 8: Providing Assistance to & Monitoring Subrecipients

COIC does not pass federal funding through to any subrecipients. COIC is a subrecipient of federal funding that is passed through the City of Redmond, the City of Madras, the City of Prineville, the City of Sisters, and Deschutes County who passes through funding on behalf of the City of La Pine.

Section 9: Title VI Equity Analysis for Facility Acquisition

Title 49 CFR Part 21, Appendix C, Section (3)(iv) requires "the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin." For purposes of this requirement, "facilities" does not include bus shelters, as they are considered transit amenities. It also does not include transit stations, power substations, or any other project evaluated by the National Environmental Policy Act (NEPA) process. Facilities included in the provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc.

COIC has not built a CET facility that is applicable under these guidelines as of the writing of this Title VI document.

Section 10: Fixed Route Transit Provider Service Standards & Policies

FTA Circular 4702.1B, Chapter IV, Section 4: All fixed route transit providers shall set service standards and policies for each specific fixed route mode of service they provide.

CET is a fixed route service provider. However, we do not operate 50 or more fixed route vehicles in peak service, and we are not located in a large UZA. CET has adopted the following system-wide standards and policies to ensure service design and operations practices do not result in discrimination on the basis of race, color, or national origin. Service policies differ from service standards in that they are not necessarily based on a quantitative threshold.

Docusign Envelope ID: 8AFC8A38-3B60-4F5A-BFD0-9CD0FC58BB06

Service Standards

FTA requires that all fixed route transit providers develop quantitative standards for all fixed route modes of operation for the following indicators. CET has prepared standards for all modes it operates including fixed route, motorbus, and demand response.

a. 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.

Load Factors by Service Type

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.

b. 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 a headway of 30 to 45 minutes during both peak and non-peak times on weekdays. Those headways shift to 60 minutes on Saturdays.

   Community Connector: Generally, routes have headways of approximately 80 minutes during both peak and non-peak times. Specific routes vary depending on the drive time between specific communities. It should be noted that 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.

   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 entry point. This service has a 30-minute headway; with a 15-minute headway during peak requirements.

   Bend Dial-a-Ride: Headway is not applicable for this service.

   Rural Dial-a-Ride: Headway is not applicable for this service.

Docusign Envelope ID: 8AFC8A38-3B60-4F5A-BFD0-9CD0FC58BB06

c. On-Time Performance – A measure of runs completed as scheduled.

Bend Fixed Route, Community Connector and Recreation 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. 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. 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.

On-Time Performance Standards by Service

Service Type	Minimum	Goal
Bend Fixed Route	90%	95%
Community Connector	90%	95%
Recreation Service	90%	95%
Bend Dial-a-Ride	90%	95%
Rural Dial-a-Ride	90%	95%

CET's on-time performance is provided to the COIC board annually.

d. 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 sizes 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, and 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.

Service Policies

FTA requires fixed route transit providers to develop a policy for service indicators. CET has prepared the following policies for its transit system.

Docusign Envelope ID: 8AFC8A38-3B60-4F5A-BFD0-9CD0FC58BB06

a. Distribution of 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.

b. 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 is shown in the following table.

CET Average Fleet Age for Each Service Type

Service Type	# of Active Vehicles	Average Age of Vehicles (Years)
Bend Fixed Route	17	5.5
Community Connector	9	6.5
Recreation Service	7	10.0
Bend Dial-a-Ride	12	9.0
Rural Dial-a-Ride	21	8.6

Within the restrictions set by FTA of moving vehicles between service types, and capacity requirements for particular routes, 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.