

*Northeast Oregon
Public Transit
Wallowa County*



*Title VI Standards and
Policies*

(Adopted by Community Connection of Wallowa County Transit Advisory Council 2020)

Title VI Standards and Policies

1.0 Introduction and Purpose

As a Subrecipient Agency receiving federal grant funds through the Oregon Department of Transportation Public Transit Division, Community Connection of Northeast Oregon, Inc., through its NEOtransit public transportation program brand, is required to have a written Title VI policy. This policy will provide guidelines to assure there is no discrimination based on factors which include, but are not limited to, race, ethnicity, age, disability status or gender. If an agency is found in violation of Title VI, that agency may lose its federal funding.

This policy specifically addresses discrimination prohibited based on Title VI of the 1964 Civil Rights Act, a federal statute. It is intended to:

- Ensure that the level and quality of public transportation service is provided in a nondiscriminatory manner;
- Promote full and fair participation in public transportation decision-making without regard to race, color or national origin;
- Ensure meaningful access to transit-related programs and activities by persons with limited English proficiency

The exact language prohibiting discrimination in Title VI reads: "No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance."

1.1 Title VI Definitions

Color: Skin color or complexion

Discrimination: An intentional or unintentional action through which a person, solely because of race, color, national origin, religion, or gender has been subjected to unequal treatment under a program or activity receiving federal financial assistance.

National Origin: A person's, or his or her ancestor's, place of birth. May also refer to the physical, cultural or linguistic characteristics associated with ethnicity or ancestry.

Race (as defined by the U.S. Census): A social classification of people which includes, at a minimum, White, Black or African American, American Indian or Alaska Native, Asian, Native Hawaiian or Other Pacific Islander.

2.0 Title VI Program Requirements

2.1 Title VI Notification to the Public:

NEOtransit must inform customers and the public of their rights under Title VI regulations by posting a Title VI Notice (Appendix A). The Title VI notice must include:

- A statement that the agency operates programs without regard to race, color or national origin.
- Information on how to request additional information about the agency's Title VI obligations. This includes such items as how to file a complaint, the location of the complaint form, etc.
- Information on how to request Title VI information in another language. Northeast Oregon Public Transit in Wallowa County posts basic Title VI notifications in our buses, county office, and on our web site.

2.2 Title VI Complaint Procedures:

Northeast Oregon Public Transit in Wallowa County has established a formal complaint procedure for handling and tracking Title VI complaints. On an annual schedule dictated by ODOT Public Transit, NEOPT Wallowa County will submit copies of its Title VI logs, complaints, investigations, mediations and/or law suits.

How To File a Title VI Complaint:

A Title VI complaint form (Appendix B) is available at our office at 702 NW 1st Street, Enterprise, Oregon and online at <https://ccno.org/publictransit/title-vi/>

A complainant may submit his or her completed form to our service office, our administration office (if he or she prefers) or can bypass NEOtransit altogether and file directly with FTA.

NEOtransit Wallowa County provides complaint forms and procedures in Large Print and alternative formats upon request. We provide Title VI Complaint Forms and procedures in Spanish as needed.

How NEOtransit Wallowa County Responds to Title VI Complaints:

Upon receipt of a Title VI complaint, the Assistant Transit Manager or County Manager will:

- 1) Log the complaint into the local Title VI register and assign a case number.
- 2) Determine the jurisdiction of the complaint.
- 3) Notify the Community Connection of Northeast Oregon, Inc. Executive Director of receipt of a Title VI Complaint and the jurisdiction subject to the complaint.
- 4) Mail, email, fax or in a fashion appropriate to the nature of the manner in which the complaint was received, provide a written acknowledgment that the complaint has been received, including the case number.
 - a. If the complaint stems from the actions of a service for which Northeast Oregon Public Transit in Wallowa County is not responsible, the Assistant Transit Manager or County Manager will refer the complaint in its entirety to the correct recipient, note the Title VI Log and guide the complainant to the correct jurisdiction.
- 5) Within seven (7) calendar days from the log date, the Assistant Transit Manager or the Wallowa County Manager will investigate the full complaint including (but not limited to):
 - a. Clarifying questions with the complainant
 - b. Interviewing staff alleged to be involved
 - c. Inquiring with witnesses to alleged event(s)
 - d. Consult with local and state Civil Rights experts
 - e. Follow up conversations with complainant
- 6) Within ten (10) calendar days from the log date, the Wallowa County Manager or the Assistant Transit Manager will provide the respondent(s) and CCNO Executive Director with a written account of the investigation(s) and

finding(s). The respondent(s) will have ten (10) calendar days from the date of notification to accept the account of events or furnish his or her written response to the allegation(s).

- 7) Within thirty (30) days from the log date, the County Manager or the Assistant Transit Manager will take all corrective actions deemed to be necessary and appropriate.
- 8) Within sixty (60) days from the log date, the final investigative report and a copy of the complaint will be forwarded to the complainant(s), respondent(s), CCNO Executive Director, ODOT Public Transit and the Federal Transit Administration's Office of Civil Rights.
- 9) If a complainant is not satisfied with the results of an investigation, he or she may appeal to the Federal Transit Administration's Office of Civil Rights.

2.3 TRANSIT-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS LIST:

NEOtransit Wallowa County shall maintain a list or log of all Title VI investigations, complaints, and lawsuits pertaining to their transit-related activities (Appendix C). As this information must be submitted to PTD annually, it is best to keep an on-going log of complaints entered as the complaints come in. Information will be more accurate, and the upkeep of the log easier. No complaints have led to an investigation or lawsuit.

- a) The list or log shall include dates, a summary of allegation(s), status, actions taken by NEOtransit Wallowa County in response, and the final outcome (if resolved) for:
 - i. Active investigations by FTA, the agency itself, or any other entity, which are based on race, color, or national origin discrimination allegation(s).
 - ii. Lawsuits which are based on race, color, or national origin discrimination allegation(s).
 - iii. Complaints naming NEOtransit which are based on race, color, or national origin discrimination allegation(s).

3.0 Public Participation Plan

It is the purpose of the NEOPT Wallowa County Public Participation Plan to provide opportunities for the public to be involved in proposed transportation decisions, including transportation development and Coordinated Plans, service design changes, new services, fare changes, and changes of service policy that may limit access to service.

An annual summary of public participation and outreach efforts will be provided to ODOT Public Transit as part of required annual reporting.

To be considered complete by ODOT Public Transit, a written Public Participation Plan (herein a component in a larger plan) includes:

- Proactive strategies , procedures and desired outcomes for public participation activities
- Provisions for early, frequent, and continuous engagement by the public
- Promote inclusive participation of low income, minority, and Limited English Proficiency populations including individuals living with disabilities

3.1 PROACTIVE STRATEGIES, PROCEDURES AND DESIRED OUTCOMES FOR PUBLIC PARTICIPATION:

Strategy A –Community Connection of Wallowa County Transit Advisory Committee (TAC):

NEOtransit Wallowa County has an active Transportation Advisory Council that is currently comprised of five (5) community members. The committee meets every three months, and a portion of each meeting is set aside to provide regular, continuous opportunity for public feedback on public transit issues. The meeting is a public meeting. WC also does public outreach with partner providers to ensure all people are aware of our services.

| | Caucasian | Hispanic/Latino | African American | Asian | Native American | Pacific Islander |
|-----|-----------|-----------------|------------------|-------|-----------------|------------------|
| TAC | 80% | 0% | 20% | 0% | 0% | 0% |

Resulting Outcomes:

This Committee is an inclusive, representative and functional group. It makes better use of on-going public outreach processes.

Stakeholder Membership Categories:

- Elderly Persons
- User of Transportation Services
- Under-Served Areas
- Provider of Services

Strategy B – Improve Direct Stakeholder Communication Procedures:

Public Transit is a rapidly changing and developing service. NEOtransit Wallowa County will use the tools already available to communicate with stakeholders in innovative ways. Examples include newsletters posted on buses, on-board surveys, a regularly updated blog on the web site and weekly promotions through the NEOtransit Facebook profile.

Resulting Procedures:

Staff will be assigned content development and distribution tasks.

Resulting Outcomes:

Communication with riders and other stakeholders will cost effectively improve. New and inexpensive media delivery channels will be developed that will raise the NEOtransit profile in the communities that are served.

4.0 Language Assistance Plan for Limited English Proficient (LEP) Populations:

A Limited English Proficient (LEP) Program is the obligation of each recipient of FTA funding (originated by Presidential Executive Order 13166 on August 11, 2000). LEP individuals are those for whom English is not their primary language and who have limited or no ability to speak, understand, read or write English. Under FTA C 4702.1B, agencies are required to take reasonable steps to ensure meaningful access to benefits, services, information and other important portions of programs and activities for LEP individuals.

The 'Four Factor Analysis for LEP' Guidance provided by FTA states what constitutes "reasonable step to ensure". The four factors are:

- 1) Demography: Number and proportion of LEP persons eligible to be served and the languages spoken in the service area.
- 2) Frequency of contact with transportation services.
- 3) Nature and importance of service.
- 4) Funding and other Resources available for LEP outreach.

4.1 LEP Four-Factor Analysis:

Demography - Who is eligible to be served?

The service definition for NEOtransit Wallowa County states the entire population is eligible to use public transportation services.

Industry in Wallowa County is primarily manufacturing, retail trade, and health & social services. There are little seasonal types of employment for migrant workers that would create times when LEP services are more necessary.

The United States Census Quick Facts 2019 Estimates found that there are 7,208 people in Wallowa County. 6,862 people are 5 years and older. 6,970(96.7%) of these speak only English, while 235(3.6%) speak a language other than English.

At this time, the American Factfinder Report (2011-2015) has not been updated. Languages present in Wallowa County in 2015: Spanish-117(1.8%), Indo-European-92(1.4%), Asian and Pacific Island languages-26(.4%). The majority of the people speaking other languages than English, 172(73.2%) report speaking English "very well," 63(26.8%) speak English less than "very well."

FTA Circular 4702.1B is clear about the 'Safe Harbor' threshold of 1,000 people or 5% of the population, whichever is less. NEOtransit Wallowa County does not meet this guideline threshold. NEOtransit Wallowa County will continue to monitor the community demographics, and develop LEP processes and procedures as needed to provide service to this population, which will be discussed in a later portion of this policy, Section 4.2.

Frequency of Contact:

At the time of this policy, NEOtransit Wallowa County has no historical basis to measure passenger participation by race. A verbal survey of bus drivers and dispatchers provide some anecdotal evidence that there are an estimated two to three Hispanic passengers and one African American who used the service.

Within the scope of contact with persons of Limited English Proficiency, contact happens twice or fewer times per year.

Resources Available for LEP Outreach:

The FTA guidance recognizes that providers have limited resources, depending on the size of their services. NEOtransit Wallowa County has limited funding and staff time to develop LEP program activities and outreach. At minimum, NEOtransit Wallowa will make translations of their vital documents available to LEP populations in their service area upon request.

4.2 Language Assistance Program in Wallowa County:

The LEP program for NEOtransit Wallowa County includes a variety of strategies aimed at providing information as necessary to persons who need information in a language other than English. The focus of the program will be on resources and information in Spanish, since demographic data shows that population is the most significant in the county, in terms of language.

Program Strategies Include:

- Use of schedules, service guides, and other information available in Spanish.
- Use of Oregon Relay Spanish TTY service information on NEOtransit publications and website.
- Use of 'I Speak' cards by office staff and bus drivers. (available from US census website)
- Instruction and training for agency staff on use of LEP resources, including
 - LEP Policies and procedures
 - Spanish to English telephone relay service
 - 'I Speak' cards
 - Knowledge of local resources, if any available, for interpreters.
- Use of published resources such as 'Basic Spanish for Transit Employees'
- Use of LEP family members or friends to serve as interpreters

Notification of Available Services to LEP persons:

- Signs in English/Spanish will be posted on busses, offices, and on website to inform LEP persons of information or services available in Spanish.
- Outreach documents, such as brochures, guides, and notices will include LEP assistance information

5.0 Minority Representation

Title VI guidance from ODOT Public Transit division requires transit-related, non-elected planning boards, advisory councils, or committees selected by NEOtransit Wallowa County to provide a table depicting the membership broken down by race.

| | Caucasian | Hispanic/Latino | African American | Asian | Native American | Pacific Islander |
|-------------------------|-----------|-----------------|------------------|-------|-----------------|------------------|
| Service Area Population | 95.7% | 3.4% | 0.4% | 0.5% | 1% | .2% |
| TAC | 80% | 0% | 20% | 0% | 0% | 0% |
| Staff | 94% | 6% | 0% | 0% | 0% | 0% |

6.0 FIXED ROUTE SERVICE STANDARDS AND POLICIES

FTA defines Fixed Route as: Public transit service (other than by aircraft) provided on a repetitive, fixed-schedule basis along a specific route, with vehicles stopping to pick up passengers.

NEOtransit Wallowa County, is not a subrecipient who provides fixed route service. As such, there are not Standards and Policies implemented addressing such service.

6.0 Fixed Route Service Policies

NEOtransit Wallowa County is not a subrecipient of fixed route service. As such, there are not Standards and Policies implemented addressing such service.

6.0 Major Service Change Policy

All major increases or decreases in transit service are subject to a Title VI Analysis prior to Board approval of the service change.

A Major Service Change shall be defined as a reduction or increase of 25% or more in total vehicle revenue service miles or revenue service hours in any specific route or mode as measured over a one month period. The following service changes are exempted:

- Changes to a service on a route with an average of fewer than 10 trips per month over the most recent 12 months
- The introduction (or discontinuation) of a short or limited-term service. Examples include:
 - Promotional or demonstration projects
 - Seasonal routes
 - Event driven services (such as Alpenfest)
 - Emergency services
 - Route modifications to mitigate construction or other unavoidable barriers

As long as the service has not been (or will not be) in operation for more than twelve months

- Routes or services that have been replaced by a different mode or operator

The staff will develop an evaluation mechanism for proxy outcomes. There is often value in a service being available even if no one regularly uses it. This nuance is often lost in a strictly quantitative reckoning. It is critical to capture the low frequency objectives from a stakeholder's perspective before passing any Major Service Change recommendation on to the Board for formal adoption.

7.0 Disparate Impact and Disproportionate Burden Policy

This policy establishes a threshold for determining whether a given action has a disparate impact on a minority population per FTA Circular 4702.1B.

Disparate Impact refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color or national origin, where our policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race color or national origin...

This policy shall establish a threshold for determining when adverse effects of service changes are borne disproportionately by minority populations. The disparate impact threshold defines statistically significant disparity and may be presented as a statistical percentage of impacts born by minority populations compared to impacts borne by non-minority populations. The disparate impact threshold must be applied uniformly and may not be altered until the next Title VI Program update.

In the course of performing an analysis of a Major Service Change, the agency must consider how proposed actions will impact minority (as compared to non-minority) populations. In the event that proposed action has a negative impact that affects minorities more than non-minorities with a disparity that exceeds the adopted Disparate Impact Threshold, the agency must evaluate whether there is an alternative that may result in a more equitable impact. Otherwise, NEOTransit must take measures to mitigate the impact of the proposed action on the affected minority population and demonstrate that a legitimate business purpose cannot otherwise be accomplished and that the proposed change is the least discriminatory alternative.

The Disparate Impact Threshold used to determine adverse impacts of a Major Service Change (as defined in Section 3.0) is established at 20% based on the cumulative impact of the proposed change. This threshold applies to the difference of the impacts born by the minority populations compared to the non-minority populations.

This policy also establishes a threshold for determining whether a given action has a disproportionate burden on low income populations versus non low income populations. The Disproportionate Burden Policy applies only to low income populations that are not also minority populations. Per FTA Circular 4702.1B:

The policy shall establish a threshold for determining when adverse effects of service changes are borne disproportionately by low income populations. The disproportionate burden threshold defines statistically significant disparity and may be presented as a statistical percentage of impacts borne by low income populations as compared to impacts born by non-low income populations. The disproportionate burden threshold must be applied uniformly and cannot be altered until the next Title VI Program update. At the conclusion of the analysis, if the transit provider finds that low income populations will bear a disproportionate burden of the proposed change, the provider should take steps to avoid, minimize or mitigate impacts where practicable. The transit provider should describe alternatives available to low income populations affected by service changes.

The threshold for Northeast Oregon Public Transit in Wallowa County to determine Disproportionate Burden impacts of a Major Service Change (as defined in Section 6.0) is established at 20% based on the cumulative impact of the proposed change. This threshold applies to the difference of the impacts borne by low income populations as compared to the same impacts borne by non-low income populations.

Community Connection of Wallowa County Reasonable Modification Policy

1. Purpose

The purpose of the reasonable modification policy is to ensure that Community Connection of Wallowa County offers equal and effective opportunities and access to public transportation services for persons with disabilities and full compliance with the provisions of the Title II of the Americans with Disabilities Act of 1990 and Section 504 of the Rehabilitation Act of 1973.

2. Policy

Community Connection is committed to providing equal access and opportunity to qualified individuals with disabilities in all programs, services and activities. Community Connection recognizes that in order to have equally effective opportunities and benefits, individuals with disabilities may need reasonable modifications to policies and procedures. Community Connection will adhere to all applicable federal and state laws, regulations and guidelines with respect to providing reasonable modifications, as necessary, to afford equal access to programs for persons with disabilities. Community Connection does not discriminate on the basis of disability in admission to, participation in, or receipt of services and benefits under any transit program or activity. Community Connection will take appropriate steps to ensure that persons with disabilities have an equal opportunity to participate.

No qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of Community Connection, or be subject to discrimination by Community Connection of Wallowa County.

3. Reasonable Modifications

A reasonable modification is a change or exception to a policy, practice, or procedure that allows disabled individuals to have equal access to programs, services, and activities. Community Connection will make reasonable modifications to policies, practices and procedures when necessary to ensure access to transit services for qualified individuals with disabilities, unless:

- Making the accommodation would fundamentally alter the nature of the public transportation service.
- Making the accommodation would create a direct threat to the health or safety of other passengers.
- The individual with a disability is able to fully use Community Connection's service without the accommodation being made.

For the purposes of this section, the term reasonable accommodation shall be interpreted in a manner consistent with the term "reasonable modifications" as set forth in the Americans with Disabilities Act Title II regulations at 28 CFR 35.130(b)(7), and

not as it is defined or interpreted for the purposes of employment discrimination under Title I of the ADA (42 U.S.C. 12111–12112) and its implementing regulations at 29 CFR part 1630.

4. Eligibility Criteria

An individual is eligible to be considered to receive a reasonable modification if that individual has: a physical or mental impairment that substantially limits one or more of the major life activities of such individual; a record of such impairment; or been regarded as having such impairment.

5. Requests for Reasonable Modifications

Community Connection of Wallowa County shall make information about how to contact the transit operations assistant to make requests for reasonable modifications readily available to the public through its website and rider policy guidelines.

Community Connection of Wallowa County shall follow these procedures in taking requests:

- a. Individuals requesting modifications shall describe what they need in order to use the service.
- b. Individuals requesting modifications are not required to use the term “reasonable modification” when making a request. Personnel at Community Connection will determine if the request represents a reasonable modification and proceed in accommodating the request accordingly.
- c. Whenever feasible, Community Connection requests that individuals make such requests for modifications before Community Connection is expected to provide the modified service.
- d. Where a request for modification cannot practicably be made and determined in advance (e.g., because of a condition or barrier at the destination of a paratransit, demand response, or fixed route trip of which the individual with a disability was unaware until arriving), operating personnel shall make a determination of whether the modification should be provided at the time of the request. Operating personnel may consult with management before making a determination to grant or deny the request.

Requests for accommodation may be made either orally or in writing. The reasonable accommodation process begins as soon as the request for accommodation is made.

The request can be submitted in any written format. Alternative means of filing a request, such as personal interviews, phone calls, or taped requests, will be made available for persons with disabilities if unable to communicate their request in writing or upon request.

6. Interactive Process

When a request for accommodation is made, Community Connection and the individual requesting an accommodation must engage in a good faith interactive process to determine what, if any, accommodation shall be provided. The individual and Community Connection must communicate with each other about the request, the process for determining whether an accommodation will be provided, and the potential accommodations. Communication is a priority throughout the entire process.

7. Time Frame for Processing Requests and Providing Reasonable Modification

Community Connection will process requests for reasonable accommodation and then provide accommodations, where appropriate, in as short a time frame as reasonably possible. Community Connection recognizes, however, that the time necessary to process a request will depend on the nature of the accommodation(s) requested and whether it is necessary to obtain supporting information.

8. Granting a Reasonable Modification Request

As soon as Community Connection determines that a reasonable accommodation will be provided, that decision shall be immediately communicated to the individual. This notice must be in writing in order to maintain the required information for reporting purposes. Upon request, alternative means of response will be provided.

In choosing among alternatives for meeting nondiscrimination and accessibility requirements with respect to new, altered, or existing facilities, or designated or specified transportation services, Community Connection shall give priority to those methods that offer services, programs, and activities to qualified individuals with

disabilities in the most integrated setting appropriate to the needs of individuals with disabilities.

9. Denying a Reasonable Modification Request

As soon as Community Connection determines that a request for reasonable accommodation will be denied, Community Connection will communicate the basis for the decision in writing to the individual requesting the modification. The explanation for the denial will clearly state:

- a. the specific reasons for the denial;
- b. any alternative accommodation that may create the same access to transit services as requested by the individual; and
- c. the opportunity to file a complaint relative to the Community Connection's decision on the request.

10. Complaint Process

Community Connection of Wallowa County has a process for investigating and tracking complaints from qualified individuals. These procedures shall be posted on the agency's website and will be provided to any individual where the agency has denied a request for accommodation. The process and any forms necessary to file a complaint are readily available from the web. Alternative means of filing complaints, such as personal interviews, phone calls, or taped requests, will be made available for persons with disabilities if unable to communicate their request in writing or upon request.

Any person who believes she or he has been discriminated against in obtaining a reasonable modification may file a complaint by completing and submitting a Community Connection's Reasonable Modification Complaint Form. Community Connection investigates complaints received no more than 30 days after receipt. Community Connection will process complaints that are complete. Once the complaint is received, the complainant will receive an acknowledgement of receipt. If more information is needed to resolve the complaint, Community Connection may contact the complainant. The complainant has 30 business days from the date of the letter to send requested information to Community Connection.

If Community Connection is not contacted by the complainant or does not receive the additional information within 30 business days, Community Connection may administratively close the complaint. In addition, a complaint may be administratively closed if the complainant no longer wishes to pursue their case.

After Community Connection investigates the complaint, a decision will be rendered in writing to the complainant. Community Connection will issue either a Letter of Closure or Letter of Finding.

- a. *Letter of Finding* – This letter will summarize the complaint, any interviews conducted regarding the complaint, and explain what actions will be taken by Community Connection to address the complaint.
- b. *Letter of Closure* – This letter will explain why Community Connection has determined that the complaint does not merit accommodation under the Americans with Disabilities Act and that the complaint will be closed.

If the complainant disagrees with the decision of Community Connection, an opportunity to appeal the decision may be pursued provided the complainant files notice of appeal within 21 days of the initial decision of Community Connection.

In the event of appeal, the complainant will be granted all due process, including the ability to be present additional evidence, present the case in person during an appeal hearing, and to be represented by counsel.

11. Designated Employee

Community Connection shall designate one official within the organization responsible for processing reasonable modification requests and handling complaints. This individual is:

Jennifer Hayslip, Assistant Transit Manager
Community Connection of Northeast Oregon, Inc.
702 NW 1st St.
Enterprise, OR 97828
541-426-3840
jhayslip@ccno.org

12. Record Retention

Community Connection will maintain all records related to reasonable modification requests and denials for at least three (3) years.

APPENDIX A: Title VI Notifications

Northeast Oregon Public Transit-Wallowa County

Title VI Notice

Northeast Oregon Public Transit – Wallowa County and its parent agency, Community Connection of Northeast Oregon, Inc. operate services in accordance with Title VI of the Civil Rights Act. Its programs are offered without regard to race, color or national origin. Any person who believes he or she has been aggrieved by any unlawful discriminatory practice may file a complaint with Northeast Oregon Public Transit.

For more information on Northeast Oregon Public Transit’s civil rights program, and the obligations and procedures to file a complaint please contact us at (541) 426-3840, email wallowatitlevi@ccno.org, visit our direct service office at 702 NW 1st St. in Enterprise or visit our website at <https://ccno.org/publictransit/title-vi/>

A complainant may also file a complaint directly with the Federal Transit Administration – Office of Civil Rights, Attn: Title VI Program Coordinator. East Building 5th Floor-TCR, 1200 New Jersey Avenue, SE Washington DC, 20590.



NORTHEAST OREGON
PUBLIC TRANSPORTATION

TITLE VI COMPLAINT FORM

FOR BAKER, UNION, &
WALLOWA COUNTIES

A. Complainant's information:

Name: _____

Address: _____

City/State/Zip Code: _____

Telephone Number (Home): _____

Telephone Number (Work): _____

Email Address: _____

Accessible Format Requirements? (Select One or More)

- Large Print
- TTY
- Audio Tape
- Other

B. Person discriminated against (if someone other than complainant):

Name: _____

Address: _____

City/State/Zip Code: _____

Telephone Number (Home): _____

Telephone Number (Work): _____

Email Address: _____

Relationship to the person for whom you are complaining: _____

Please explain why you have filed for a third party: _____

F. Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court? List all that apply.

Federal Agency _____

Federal Court _____

State Agency _____

State Court _____

Local Agency _____

If you have checked above, please provide information about a contact person at the agency/court where the complaint was filed.

Name: _____

Title: _____

Address: _____

City/State/Zip Code: _____

Telephone Number (Home): _____

Telephone Number (Work): _____

Email Address: _____

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

Signature _____ Date _____

Attachments: Yes _____ No _____

H. Submit form and any additional information to:

For Baker County:

Mail to:

Transit Manager
Attn: Title VI Complaint
2810 Cedar Street
Baker City, OR 97814

For Union County:

Mail to:

Transit Manager
Attn: Title VI Complaint
2204 E. Penn Ave
La Grande, OR 97850

For Wallowa County

Mail to:

Transit Manager
Attn: Title VI Complaint
702 NW First Street
Enterprise, OR 97828

Email with the subject "Title VI Complaint" to"

bakertitlevi@ccno.org

uniontitlevi@ccno.org

wallowatitlevi@ccno.org

APPENDIX C: Title VI Manual Complaint Log

| Case # | Date Received | Complainant | Phone # | Basis | Status | Disposition |
|--------|---------------|-------------|---------|-------|--------|-------------|
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |

APPENDIX D: 2019 CENSUS DATA FOR WCPT SERVICE AREA

Table

Population estimates, July 1, 2019, (V2019) 7,208

| PEOPLE | |
|--|-----------|
| Population | |
| Population estimates, July 1, 2019, (V2019) | 7,208 |
| Population estimates base, April 1, 2010, (V2019) | 7,008 |
| Population, percent change - April 1, 2010 (estimates base) to July 1, 2019, (V2019) | 2.9% |
| Population, Census, April 1, 2010 | 7,008 |
| Age and Sex | |
| Persons under 5 years, percent | 4.8% |
| Persons under 18 years, percent | 18.6% |
| Persons 65 years and over, percent | 29.2% |
| Female persons, percent | 50.6% |
| Race and Hispanic Origin | |
| White alone, percent | 95.7% |
| Black or African American alone, percent(a) | 0.4% |
| American Indian and Alaska Native alone, percent(a) | 1.0% |
| Asian alone, percent(a) | 0.5% |
| Native Hawaiian and Other Pacific Islander alone, percent(a) | 0.2% |
| Two or More Races, percent | 2.3% |
| Hispanic or Latino, percent(b) | 3.4% |
| White alone, not Hispanic or Latino, percent | 92.8% |
| Population Characteristics | |
| Veterans, 2014-2018 | 655 |
| Foreign born persons, percent, 2014-2018 | 2.4% |
| Housing | |
| Housing units, July 1, 2019, (V2019) | 4,282 |
| Owner-occupied housing unit rate, 2014-2018 | 65.7% |
| Median value of owner-occupied housing units, 2014-2018 | \$227,700 |

| | |
|--|----------|
| Median selected monthly owner costs -with a mortgage, 2014-2018 | \$1,339 |
| Median selected monthly owner costs -without a mortgage, 2014-2018 | \$448 |
| Median gross rent, 2014-2018 | \$684 |
| Building permits, 2019 | 32 |
| Families & Living Arrangements | |
| Households, 2014-2018 | 3,165 |
| Persons per household, 2014-2018 | 2.15 |
| Living in same house 1 year ago, percent of persons age 1 year+, 2014-2018 | 86.7% |
| Language other than English spoken at home, percent of persons age 5 years+, 2014-2018 | 3.3% |
| Computer and Internet Use | |
| Households with a computer, percent, 2014-2018 | 85.1% |
| Households with a broadband Internet subscription, percent, 2014-2018 | 74.4% |
| Education | |
| High school graduate or higher, percent of persons age 25 years+, 2014-2018 | 92.5% |
| Bachelor's degree or higher, percent of persons age 25 years+, 2014-2018 | 24.7% |
| Health | |
| With a disability, under age 65 years, percent, 2014-2018 | 14.1% |
| Persons without health insurance, under age 65 years, percent | 8.8% |
| Economy | |
| In civilian labor force, total, percent of population age 16 years+, 2014-2018 | 54.7% |
| In civilian labor force, female, percent of population age 16 years+, 2014-2018 | 51.1% |
| Total accommodation and food services sales, 2012 (\$1,000)(c) | 9,698 |
| Total health care and social assistance receipts/revenue, 2012 (\$1,000)(c) | 33,931 |
| Total retail sales, 2012 (\$1,000)(c) | 63,593 |
| Total retail sales per capita, 2012(c) | \$9,323 |
| Transportation | |
| Mean travel time to work (minutes), workers age 16 years+, 2014-2018 | 16.2 |
| Income & Poverty | |
| Median household income (in 2018 dollars), 2014-2018 | \$44,953 |
| Per capita income in past 12 months (in 2018 dollars), 2014-2018 | \$28,960 |
| Persons in poverty, percent | 14.5% |

BUSINESSES

| | |
|---|--------|
| Businesses | |
| Total employer establishments, 2017 | 365 |
| Total employment, 2017 | 1,763 |
| Total annual payroll, 2017 (\$1,000) | 63,451 |
| Total employment, percent change, 2016-2017 | -6.5% |
| Total nonemployer establishments, 2018 | 875 |

| | |
|-------------------------------|-------|
| All firms, 2012 | 1,091 |
| Men-owned firms, 2012 | 428 |
| Women-owned firms, 2012 | 346 |
| Minority-owned firms, 2012 | F |
| Nonminority-owned firms, 2012 | 1,057 |
| Veteran-owned firms, 2012 | 82 |
| Nonveteran-owned firms, 2012 | 968 |

GEOGRAPHY

Geography

| | |
|----------------------------------|----------|
| Population per square mile, 2010 | 2.2 |
| Land area in square miles, 2010 | 3,146.19 |
| FIPS Code | 41063 |

QuickFacts data are derived from: Population Estimates, American Community Survey, Census of Population and Housing, Current Population Survey, Small Area Health Insurance Estimates, Small Area Income and Poverty Estimates, State and County Housing Unit Estimates, County Business Patterns, Nonemployer Statistics, Economic Census, Survey of Business Owners, Building Permit.