



Community Connection of Northeast Oregon, Inc.

Union County Public Transportation

Civil Rights Program

Title VI, Limited English Proficiency (LEP) Plan



05-21-2025

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Introduction

This program reflects Union County Public Transportation's (UCPT) commitment to ensuring that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity provided by Union County Public Transportation.

Signed Policy Statement

A policy statement signed by the Transit Manager assuring Northeast Oregon Public Transportation's compliance with Title VI of the Civil Rights Act of 1964 can be found as *Appendix A*.

Notification of UCPT's Title VI Obligations

Union County Public Transportation publicizes its Title VI program by posting the following notices in English and Spanish on the UCPT website, customer brochures, all vehicles, and at the UCPT Transit Hub.

Title VI Notice to the Public – English



Northeast Oregon Public Transportation-Union County Title VI Notice

Northeast Oregon Public Transportation – Union 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 Transportation.

For more information on Northeast Oregon Public Transportation's civil rights program, and the obligations and procedures to file a complaint please contact us at (541) 963-8277, <https://ccno.org/wp-content/uploads/2024/10/NEOPTTitleVIComplaintForm.pdf> or visit our direct service office at 2204 E. Penn, La Grande, Oregon, 97850.

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.

Title VI Notice to the Public – Spanish



Northeast Oregon Public Transportation-Union County Title VI Notice

Transporte público del noreste de Oregón: el condado de Union y su agencia matriz, Community Connection of Northeast Oregon, Inc. operan servicios de acuerdo con el Título VI de la Ley de Derechos Civiles. Sus programas se ofrecen sin distinción de raza, color u origen nacional. Cualquier persona que crea que ha sido agraviada por cualquier práctica discriminatoria ilegal puede presentar una queja ante el Transporte Público del Noreste de Oregón.

Para obtener más información sobre el programa de derechos civiles de Northeast Oregon Public Transportation y las obligaciones y procedimientos para presentar una queja, comuníquese con nosotros al (541) 963-8277, https://ccno.org/wp-content/uploads/2025/05/TitleVI_ADAComplaintForm-Sp.pdf o visite nuestra oficina de servicio directo en 2204 E. Penn, La Grande, Oregon, 97850.

Un denunciante también puede presentar una queja directamente ante la Administración Federal de Tránsito - Oficina de Derechos Civiles, Attn: Coordinador del Programa del Título VI. Edificio este, quinto piso-TCR, 1200 New Jersey Avenue, SE Washington DC, 20590.

Title VI Complaint Procedure (English) (Spanish – Appendix B)

Any person who believes he or she has been discriminated against based on race, color, or national origin by Union County Public Transportation may file a Title VI complaint by completing and submitting the agency's Title VI complaint form which can be accessed as indicated in the notice above. Our process for addressing a civil rights complaint is as follows:

- Once the complaint is received, UCPT will review it to determine the jurisdiction of the complaint. The complaint will be logged, and the complainant will receive an acknowledgement letter, email, or fax (in a fashion appropriate to the manner

- in which the complaint was received) within 14 days informing her/him whether the complaint will be investigated by our office.
- Any complaint UCPT receives that deals with federal civil rights issues will be reviewed by the Transit Manager and forwarded to the Executive Director of Community Connection of Northeast Oregon, Inc (CCNO).
 - Once the complaint is logged, UCPT has 60 days to resolve the issue: not including the appeals process.
 - Within seven calendar days from the log date, the UCPT Manager or CCNO Administrative staff will investigate the full complaint including but not limited to: clarifying questions with the complainant, interviewing staff alleged to be involved, inquiring with witnesses to alleged event(s), consulting with local and state civil rights experts, and following up with the complainant.
 - Within ten calendar days from the log date, the Transit Manager or CCNO Administrative staff 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 calendar days from the date of notification to accept the account of events or furnish his or her written response to the allegation(s).
 - Within 30 days from the log date, the Transit Manager will take all corrective actions deemed to be necessary and appropriate.
 - Within 60 days from the log date, UCPT's 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.
 - If the complainant wishes to appeal the decision, he/she may appeal to the Federal Transit Administration's Office of Civil Rights.

Title VI Complaint Form (English & Spanish)

Refer to *Appendix C and D*

Transit-related Title VI Investigations, Complaints and Lawsuits

Union County Public Transportation maintains an active log of all civil rights complaints. A copy of the current log is available upon request by submitting a public records request via a letter or email to the Transit Manager.

Public Participation Plan

Union County Public Transportation offers continuous opportunities for public involvement in proposed transportation decisions. The primary way for the public to participate is by attending Transportation Advisory Council (TAC) meetings. These meetings are open to the public, held in ADA-accessible locations, and publicly advertised on UCPT's website. TAC meetings are held five times per year; the dates are voted on and approved annually. Meetings take place in the conference room at the UCPT Hub, located at 2204 East Penn Avenue, La Grande, Oregon. They always start at 3:00 p.m. and typically end by 4:30 p.m.

UCPT meets the public involvement goals outlined in the Oregon Department of Transportation's Public Transit State Management Plan. UCPT actively seeks and considers the viewpoints of BIPOC, low-income, and LEP populations during public outreach and involvement activities (refer to the attached LEP plan). UCPT also provides private sector providers with a reasonable opportunity to comment on plans and programs, and to be included in coordinated plans.

The following is a general description of UCPT's public involvement processes, which vary depending on the subject, purpose, and scope of the program, policy, or decision:

- Surveys
- Open Public Meetings: (TAC or others as scheduled)
- Work Groups
- Website Information
- Solicitation of Comments
- Community Outreach and Service Promotion: This includes participation in public activities such as parades, downtown trick-or-treating, the county fair, job fairs, and other community events.
- Provision of Information in Alternate Formats: Such as Spanish or other languages as needed. Additionally, public meetings or hearings are held with adequate notice provided through multiple advertising channels.

Summary of Public Participation Efforts

UCPT complies with grant-related public involvement requirements as defined by grant application documents. The following is a summary of UCPT's public participation efforts over the last few years.

Printed Materials

UCPT has translated service information on UCPT's website and published materials into Spanish. General information about UCPT's services is posted on UCPT's website in English and Spanish and translations to other languages are available upon request.

Fixed Route schedules and Paratransit service information are printed and distributed in English and Spanish. Outreach materials, surveys, press releases, and meeting notices for major service changes are available in English and Spanish.

Phone Access

UCPT communicates with non-English speaking individuals using online resources such as Google Translate and guides that contain Spanish translations for common transit phrases.

Public Outreach

Over the past several years, UCPT participated in multiple parades, resource fairs, Trunk or Treat, the county fair, and other community festivals. We also hosted a resource fair with Northeast Oregon Network (NEON) to specifically branch out to the Pacific Islander and Latino communities. The goal of the hosted resource fair was to continue to raise awareness of UCPT for the non-English speaking communities. We had information available to the public in Marshallese, Marshallese and Spanish, with fliers and speaking staff on hand to answer questions. UCPT utilized local TAC members, friends, and social media to promote UCPT awareness. We are actively making efforts to put someone in the BIPOC seat. In the future, we will grow our outreach efforts to our BIPOC and LEP populations through more aggressive efforts on social media and increased community events to draw in participation to the UCPT planning process.

BIPOC & LEP Populations Future Outreach

UCPT will continue to monitor the BIPOC and LEP populations in Union County based on census data. Community Connection of Northeast Oregon, Inc. has made advancements in providing LEP and BIPOC communities with other non-transportation related services. To serve marginalized populations, we have turned to community leaders and community members to tell us how programming can be best designed to meet their needs. Because of these efforts, we are seeing a greater number of Marshallese speaking citizens access our services overall. As these positive relationships continue to grow, UCPT will utilize the continued positive relationship to promote public transit. In the future, UCPT will actively participate in meetings with BIPOC and LEP populations when they are presented through other services provided by Community Connection of Northeast Oregon, Inc.

Language Assistance Plan

The 2021 update to the 2020 Census data estimates UCPT's service area of La Grande¹ has a population that is approximately 5.2% Hispanic or Latino. All other non-white races and ethnicities comprise 7.4% of the total population in the service area. The 2020 ACS 5-Year Estimates for Language Spoken at Home shows approximately 1.6% of the population speak Spanish as the language spoken at home and 1.8% of the population speak Asian and Pacific Island languages as the language at home. Documents translated in Spanish are already being utilized. With the growing Marshallese speaking populations, UCPT is currently researching how to best provide translations.

UCPT's services are important to all the populations served. Services help all riders, including non-English speaking individuals, access a wide range of services in the community. Although it is unknown whether non-English speakers use UCPT's services more or less frequently than all riders, UCPT has determined that Spanish language translations services are necessary because of the significant number of Spanish speaking individuals in the community. UCPT's Language Services include:

- Translation of written materials: UCPT has translated service information on UCPT's website and in published materials into Spanish.
- Usage of Google & Apple Translate: Every employee has a smart phone with access to a translatory app or website.

LEP Monitoring and Updates to This Plan

UCPT monitors the linguistic needs of its riders both formally and informally. Formally, UCPT reviews available census data during each decennial census and ongoing published estimates during triennial plan updates. UCPT makes efforts to work with Eastern Oregon University's Multi-Cultural Director. These data sources, combined with informal reports from the community, help UCPT maintain a current understanding of local linguistic patterns. Changes to the LEP plan are determined by the TAC and UCPT staff, based on the changing demographics of the service area.

¹ See *Appendix E, F, G, and H* for additional details

Employee LEP Training

UCPT does not provide ongoing language assistance/ translation service to its staff. However, it does provide staff with a guide of translations of common transportation phrases into Spanish and all staff are trained to utilize their smart devices using translatory applications.

Race and Hispanic Origin Representation Table

	Caucasian	Hispanic/Latino	African American	Asian	Native American	Pacific Islander
Service Area Population (2023 Census EST.)	86.6%	6.2%	1.2%	1.9%	1.6%	1.6%
TAC	92%	0%	0%	0%	8%	0%
Staff	90%	10%	0%	0%	0%	0%

Title VI Equity Analysis

UCPT is aware of Title VI requirements to conduct equity analyses for all facility construction projects during the planning stage. UCPT will follow requirements under the National Environmental Policy Act and other overarching planning processes to guide equitable consideration of facility sites and their impacts. A facility that results in Disparate Treatment may have substantial legitimate justification and lack of other alternatives. If so, both must be demonstrated in the planning process.

Fixed Route Service Standards and Policies

Vehicle Headway

At Union County Public Transit (UCPT), our Deviated Fixed Route service, updated in Fiscal Year 2023, runs every 45 minutes. We designed these routes to balance how often buses arrive with how much of the county we can cover. Our service operates Monday through Friday from 7:30 a.m. to 5:45 p.m., and Saturdays from 8:15 a.m. to 4:30 p.m. We regularly review our bus frequency and timing to best serve you within our budget.

On Time Performance

At UCPT, a bus is considered late if it departs a scheduled time point five or more minutes beyond its published time. Our schedules are intentionally padded by one to two minutes to allow for recovery at the end of each route. While local management is generally flexible regarding delays on Deviated Fixed Routes, early departures are never acceptable.

The nature of a deviated fixed route means we don't adhere to the same on-time performance monitoring standards as a traditional fixed route service. Its operational flexibility requires a different approach.

Service Availability

With changes in UCPT operations since the initial launch of our Title VI service, the service area has changed from all of Union County to the cities of La Grande and Island City. UCPT still provides demand response services outside of the newly designated service area, but the public transit services in general are restricted to the above-mentioned cities.

UCPT operates with the goal of ensuring that 74.5% of the county residents live within $\frac{3}{4}$ of a mile of a public transit service line. Transit access is determined by mapping all active public transit bus services in Union County and then calculating the population (based on 2023 Census data) within a $\frac{3}{4}$ mile radius of those lines. The information is compared to the total population in the county. UCPT's service area has a population of 13,058. The Deviated Fixed Route service is available to 100% of the residents living within the service area (*Appendix F*). UCPT makes connections from the transit Hub with both services in three neighboring counties.

Amenities

There is one transit center/hub in Union County. Operated by UCPT and located at 2204 East Penn Ave, La Grande, Oregon, it includes a driver breakroom,

information kiosk and parking spaces nearby. There are also five bus shelters located along the Deviated Fixed Route path.

Transit amenities are distributed throughout our Fixed Route system. The location of our present amenities was established by agency and ODOT local process prior to MAP-21 which included:

- Approval of DEQ Categorical Exclusion process
- Ride demand volume
- Passenger requests
- Staff recommendations
- Public comment process
- Site availability and right of way partnerships

For future processes, amenity placement criteria will include (without being limited to):

Bus Shelters: (with property owners' permission)

- Stops where boarding volume exceeds 200 passengers per month
- 80% of shelters shall be in Census Tracts featuring a population density of at least 1,000 per square mile

Bus Shelters: (with property owners' permission)

- Stops where boarding volume exceeds 100 passengers per month
- No less than 50% of bus stop benches shall be in Census Tracts featuring a population density of at least 1,000 per square mile

Trash Receptacles: (with property owners' permission)

- Stops where boarding volume exceeds 100 passengers per month
- Receptacle citing will be subject to agency ability to service (or obtain contract servicing) of regular collections

All transit amenities shall be cited in a manner consistent with racial and low-income population distributions in the county. For more information on how UCPT approaches Equity Analysis, please see the Risk Management Plan.

Vehicle Assignment Policy

Vehicles are assigned based on size and modal function. All our vehicles are maintained to FTA's State of Good Repair standard. All our buses have an equivalent level of amenities and ADA accessibility, relative to age and design. The only exception is our Hybrid Sedan, which is utilized to serve ADA paratransit riders who do not require an accessible minivan (therefore prolonging the life of our more expensive capital equipment). When new vehicles are purchased, it is our practice to replace like with like. Given UCPT's maintenance standards as well as actions to reduce the size and age of their fleet, vehicle age does not serve as a proxy for condition in Union County.

Appendices

<u>Appendix A</u>	<u>Signed Policy Statement</u>
<u>Español - Apéndice B</u>	<u>Titulo VI Procedimiento para Presentar Reclamos</u>
<u>Appendix C:</u>	<u>Title VI Complaint Form (English)</u>
<u>Appendix D:</u>	<u>Title VI Complaint Form (Spanish)</u>
<u>Appendix E</u>	<u>2021 Census Data for UCPT Service Area</u>
<u>Appendix F:</u>	<u>UCPT Language Spoken At Home</u>
<u>Appendix H:</u>	<u>Limited English Proficiency Plan (LEP)</u>

Appendix A: Signed Policy Statement



10/21/2021

Title VI

Non-Discrimination Policy Statement

Title VI of the Civil Rights Act of 1964 states:

"No person in the United States shall, on 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."

A handwritten signature in black ink, appearing to read "Kane Lester", is written over a horizontal line.

Kane Lester, Transit Manager
Union County Public Transit
Northeast Oregon Public Transportation

Español- Apéndice B: Título VI Procedimiento para Presentar Reclamos

Título VI Proceso de Queja:

A recibir su forma de queja sobre Título VI denuncia, el Jefe de las Operaciones de Tránsito:

- 1) Registrará la forma en nuestro registro Título VI y asignará un número de caso.
- 2) Determinará la origen de la denuncia. Como un centro de tránsito que sirve cuatro condados, Recibimos quejas de proveedores de servicios de que no somos responsables.
- 3) Reconocemos en Correo postal, correo electrónico, fax o de manera igual con la manera en que se recibió la denuncia , incluyendo un número de caso.

Si la queja se deriva de las acciones de de otra persona o servicio y la oficina local no es responsable, el Jefe de las Operaciones de Tránsito enviará la queja al oficina correcta, y notara en el registro Título VI y te avisa de la jurisdicción correcto.

4) Adentro de los siete (7) días de la fecha de registro de la queja, el Jefe de las Operaciones de Tránsito investigara toda la denuncia incluyendo (pero no limitadas a):

- a. Claración con el demandante
- b. Entrevistas con el/los empleados presuntamente involucrados
- c. Investigando con testigos de la supuesta evento(s)
- d. Consultar con expertos locales y estatales de los derechos civiles
- e. Conversaciones de seguimiento con el demandante

5) Adentro de los diez (10) días de la fecha de registro de la queja, el Jefe de las Operaciones de Tránsito:

Entregará al demandante(s) un escrito de la denuncia(s). El demandante(s) tendrá diez (10) días de la fecha de la notificación a responder, a aceptar la narración de los alegación(s) o presentar su propia respuesta por escrito a la alegación(s).

6) Adentro de los treinta (30) días de la fecha de registro, el Manager tránsito tomará todas las medidas correctivas que se estimen necesarias y apropiadas.

7) Adentro de los sesenta (60) días de la fecha de registro, el Jefe de las Operaciones de Tránsito informará por escrito final y una copia de la denuncia a la demandante(s), demandado(s), Al Departamento de Transporte de Oregon División tránsito público y la Oficina de Derechos Civiles Administración Federal de Tránsito.

8) Si el demandante no está satisfecho con los resultados de la investigación, él o ella puede apelar a la Oficina de Derechos Civiles. Administración Federal de Tránsito.

Sobre una base anual, Northeast Oregon Public Transit presenta copias de los registros, Título VI, las denuncias, investigaciones, mediaciones y/o acciones legales.

Appendix C: Title VI Complaint Form (English)



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: _____

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.

☐ Yes☐ No

C. Which of the following best describes the reason you believe the discrimination took place?

 Race

Color

 National Origin

Other:

D. On what date(s) did the alleged discrimination take place?

Date: _____

Date: _____

Date: _____

Date: _____

Date: _____

E. Please describe the alleged discrimination. Explain what happened and whom you believe was responsible. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If additional space is needed, add a sheet of paper.

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 D: Title VI Complaint Form (Spanish)



TRANSPORTE PÚBLICO DEL
NORESTE DE OREGÓN

FORMULARIO DE QUEJA DEL
TÍTULO 2 DE LA ADA

PARA LOS CONDADOS DE
BAKER, UNION Y WALLOWA

A. Información del denunciante:

Nombre: _____
Dirección: _____
Ciudad/Estado/Código postal: _____
Número de teléfono (casa): _____
Número de teléfono (trabajo): _____
Dirección de correo electrónico: _____

¿Requisitos de formato accesible? (Seleccione uno o más)

- ☐ Letra Grande
- ☐ TTY
- ☐ Cinta de audio
- ☐ Otra

B. Persona discriminada (si es distinta del denunciante):

Nombre: _____
Dirección: _____
Ciudad/Estado/Código postal: _____
Número de teléfono (casa): _____
Número de teléfono (trabajo): _____
Dirección de correo electrónico: _____

Parentesco con la persona por la cual se queja: _____

Por favor explique por qué ha presentado la solicitud en nombre de un tercero: _____

☐ Sí

☐ No

☐ Discapacidad ☐ Otra

Fecha: _____
 Fecha: _____
 Fecha: _____
 Fecha: _____
 Fecha: _____

This image shows a single sheet of white paper with horizontal blue or grey ruling lines. The lines are evenly spaced and run across the width of the page. There is no handwriting or other markings on the paper.

F. ¿Ha presentado esta queja ante alguna otra agencia federal, estatal o local, o ante algún tribunal federal o estatal? Enumere todas las opciones que correspondan.

Agencia federal _____
Tribunal Federal _____
Agencia Estatal _____
Tribunal estatal _____
Agencia local _____

Si ha marcado arriba, proporcione información sobre una persona de contacto en la agencia/tribunal donde se presentó la queja.

Nombre: _____
Título: _____
Dirección: _____
Ciudad/Estado/Código postal: _____
Número de teléfono (casa): _____
Número de teléfono (trabajo): _____
Dirección de correo electrónico: _____

G. Firme a continuación. Puede adjuntar cualquier material escrito u otra información que considere relevante para su queja.

Firma _____ Fecha _____

Adjuntos: Sí ☐ No ☐

H. Envíe el formulario y cualquier información adicional a:

Baker County:

Correo a:
Transit Manager
Attn: ADA Complaint
2810 Cedar Street
Baker City, OR 97814

Union County:

Correo a:
Transit Manager
Attn: ADA Complaint
2204 E. Penn Ave
La Grande, OR 97850

Wallowa County

Correo a:
Transit Manager
Attn: ADA Complaint
702 NW First Street
Enterprise, OR 97828

Envíe un correo electrónico con el asunto "Queja ADA" a"

bakertitlevi@ccno.org

uniontitlevi@ccno.org

wallowatitlevi@ccno.org

Appendix E: 2020 Census Data for UCPT Service Area

Estimate numbers generated since 2020 Census

Population Estimates, July 1 2021, (V2021)	26,212
PEOPLE	
Population	
Population Estimates, July 1 2021, (V2021)	26,212
Population estimates base, April 1, 2020, (V2021)	26,196
Population, percent change - April 1, 2020 (estimates base) to July 1, 2021, (V2021)	0.1%
Population, Census, April 1, 2020	26,196
Population, Census, April 1, 2010	25,748
Age and Sex	
Persons under 5 years, percent	5.6%
Persons under 18 years, percent	21.8%
Persons 65 years and over, percent	21.5%
Female persons, percent	50.5%
Race and Hispanic Origin	
White alone, percent	92.6%
Black or African American alone, percent (a)	0.8%
American Indian and Alaska Native alone, percent (a)	1.3%
Asian alone, percent (a)	1.3%
Native Hawaiian and Other Pacific Islander alone, percent (a)	1.3%
Two or More Races, percent	2.7%
Hispanic or Latino, percent (b)	5.2%
White alone, not Hispanic or Latino, percent	88.2%

Appendix F: Language Spoken At Home

Estimated numbers generated since 2020 ACS 5 year

<https://data.census.gov/table/ACSST5Y2023.S1601?q=050XX00US41061>

Label	Union County, Oregon					
	Total		Percent		Percent of specified language speakers	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	
Population 5 years and over	24,905	±61	(X)	(X)	24,682	
Speak only English	23,649	±324	95.0%	±1.2	(X)	
Speak a language other than English	1,256	±294	5.0%	±1.2	1,033	
SPEAK A LANGUAGE OTHER THAN ENGLISH						
Spanish	502	±142	2.0%	±0.6	358	
5 to 17 years old	30	±36	0.1%	±0.1	28	
18 to 64 years old	410	±133	1.6%	±0.5	280	
65 years old and over	62	±37	0.2%	±0.1	50	
Other Indo-European languages	351	±200	1.4%	±0.8	334	
5 to 17 years old	30	±39	0.1%	±0.2	30	
18 to 64 years old	266	±170	1.1%	±0.7	265	
65 years old and over	55	±37	0.2%	±0.1	39	
Asian and Pacific Island languages	380	±116	1.5%	±0.5	318	
5 to 17 years old	60	±35	0.2%	±0.1	38	
18 to 64 years old	296	±99	1.2%	±0.4	267	
65 years old and over	24	±19	0.1%	±0.1	13	
Other languages	23	±27	0.1%	±0.1	23	
5 to 17 years old	7	±12	0.0%	±0.1	7	
18 to 64 years old	16	±20	0.1%	±0.1	16	
65 years old and over	0	±25	0.0%	±0.2	0	

Appendix H: Limited English Proficiency Plan (LEP)

1.0 Limited English Proficiency Plan Purpose And Goals:

It is the purpose of Northeast Oregon Public Transportation (NEOPT) and its parent organization, Community Connection of Northeast Oregon, Inc. to encourage meaningful access to its Union County mobility programs and activities by persons with limited English proficiency (LEP) pursuant to Title VI of the Civil Rights Act of 1964 and its implementing regulations in Federal Transit Administration (FTA) Circular 4702.1B

It is the goal of the local management team to ensure that language assistance is reasonable, timely, and effective.

2.0 Determining Languages Eligible for LEP Programming

The languages into which NEOPT will translate its vital documents are defined by the Safe Harbor provision of FTA C 4702.1B Chapter III-9 Section (C) which states (in part):

The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations.

NEOP uses the latest census data for Union County population research to identify minority populations at risk of being underserved due to language barriers. <https://data.census.gov/cedsci/table?t=Language%20Spoken%20at%20Home&q=0500000US41061&tid=ACST5Y2020.S1601>

<https://www.census.gov/quickfacts/fact/table/unioncountyyoregon,US/PST045221>

(Appendix E, and F)

3.0 Strategies for delivery of LEP Content

NEOPT relies predominantly upon the written translation of vital documents to deliver mobility system information to people of limited English proficiency. When more in-depth conversation is needed the agency utilizes multilingual staff (if available), Google Translate, and LanguageLine Solutions interpretation call center.

Translation staff have demonstrated proficiency and the ability to communicate accurately in both English and the LEP language needed.

Google Translate is most effectively utilized with voice speaker options on a smartphone or tablet. Although this process takes a little more time it can provide a quick solution when LEP barriers arrive.

LanguageLine Solutions is a call center that provides immediate translation interpretation over the phone. <https://www.language.com/s/>

4.0 Determining Which Documents Are Vital

NEOPT considers all the following document types to vital to a seamless access to Public Transit services.

- Applications for service
- Bus passes and other forms or scrip
- Complaint forms and information on how to file
- Correspondence regarding public mobility services

- Information on provision of services to passengers with disabilities
- Notice of public outreach / comment meeting
- Notice of Right to Appeal (all services)
- Riders' guides and route pamphlets

5.0 Evaluations And Monitoring

The LEP plan is subject to NEOPT triennial update rotation.

- Assesses as accurately as possible the frequency with which it has (or should have) contacted with LEP individuals seeking assistance.
- Consider the frequency of different types of language contacts
- Consider whether appropriate outreach to LEP persons could increase the frequency of contacts with LEP language groups
- Updates LEP groups by most recent census (as census updates)
- Makes inquiry at Union County School Districts to anticipate emerging LEP groups to anticipate emerging LEP groups
- Identifies staff training needs
- Consults with representatives of known LEP groups to determine opportunities for improved communication and passenger participation.

Monitoring and Updating the LEP Plan

As this plan is designed to be flexible and should be viewed as a living document, it is important that UCPT always consider whether new documents and services need be accessible for LEP persons. Due to this provision, ongoing research is currently focused on Native Hawaiian and Other Pacific Islander populations to determine if translated documents are necessary at this time.

It is important to monitor changes in demographics and types of services. UCPT will update the LEP as required by the U.S. DOT. At a minimum, the plan will be reviewed and updated as necessary on a triennial basis.