

Northeast Oregon

Public Transit

Baker County



***Title VI Standards &
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 CCNO transit public transportation program brand, is required to have a written Title VI policy. This policy provides 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

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. (Based on the demographics for your area, other races may be included.)

2.0 Title VI Program Requirements

2.1 Title VI Notification to the Public:

CCNO 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. (This information should also be provided in other languages per DOT LEP guidance)

CCNO in Baker County posts basic Title VI notifications in our county office and on our web site.

2.2 Title VI Complaint Procedures:

How To File a Title VI Complaint:

A Title VI complaint form (Appendix B) is available at our office at 2810 Cedar St., Baker City, Oregon and online at <https://ccno.org/public-transit/baker-transit-publications/>

A complainant may submit his or her completed form to our service office, our administration office (if he or she prefers), or can bypass CCNO altogether and file directly with FTA as stated in the posted Title VI notice.

CCNO Baker County provides complaint forms and procedures in Large Print and alternative formats upon request. Additionally, Title VI Complaint Forms and procedures in Spanish can be provided as needed.

How CCNO Baker County Responds to Title VI Complaints:

Upon receipt of a Title VI complaint, CCNO staff will:

- 1) Log the complaint into the local Title VI register and assign a case number.
- 2) Determine the jurisdiction of the complaint.

- 3) The Transportation Program Manager, or designee, will 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) CCNO staff will 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 CCNO Transit in Baker County is not responsible, CCNO staff 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 Baker County Operations Manager, designee, or Executive Director 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; following up conversations with complainant
- 6) Within ten (10) calendar days from the log date, the Transportation Program Manager or designee 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 Transportation Program Manager or designee 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:

CCNO Baker 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 practice to keep an on-going log of complaints entered as the complaints come in.

The list or log shall include dates, a summary of allegation(s), status, actions taken by CCNO Baker 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 CCNO which are based on race, color, or national origin discrimination allegation(s).

3.0 Public Participation

3.1 STRATEGIES FOR PUBLIC PARTICIPATION:

Strategy A –Baker County Transportation/Traffic Safety Commission:

Baker County government had an appointed Baker County Transportation/Traffic Safety Commission that was also the Baker County STF and STIF committee. In March of 2021, Baker County established the Baker County Transportation Advisory Commission to oversee the STF and STIF project application process. A CCNO representative is seated on the committee and presents public transit issues and concerns for review and feedback.

The BCTTSC is comprised of up to 12 members appointed by Baker County Commission and selected from representative stakeholders who align with inclusivity obligations. The committee meets quarterly, 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 advertised by Baker County. This Committee is an inclusive, representative and functional group. It makes better use of on-going public outreach processes.

Strategy B – Improve Direct Stakeholder Communication Procedures:

CCNO Baker County will use the tools already at available to communicate with stakeholders in innovative ways. Examples include news and radio releases, newsletters posted on buses, on-board surveys, a regularly updated blog on the web site and weekly promotions through the CCNO Facebook profile.

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.

FTA Circular 4702.1B defines rules for the 'Safe Harbor' threshold of 1,000 people or 5% of the population, whichever is less.

CCNO Baker County does not meet this guideline threshold. CCNO Baker County will continue to monitor 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.

4.1 Demographics

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

Industry in Baker 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 U.S Census Bureau, 2024 ACS Estimates found that there are 16,912 people in Baker County with 896 (5.3%) of this population being self-identified as Hispanic-Latino.

Subject	Baker County, Oregon		
	Estimate		Percent
RACE			
Total population	16,912		
One race			

Subject	Baker County, Oregon		
	Estimate		Percent
White	15,813		93.5%
Black or African American	136		0.8%
American Indian and Alaska Native	305		1.8%
Asian	119		0.7%
Native Hawaiian and Other Pacific Islander	33		0.2%
Some other race	50		0.3%
Two or more races	456		2.7%
HISPANIC OR LATINO AND RACE			
Total population	16,912		
Hispanic or Latino (of any race)	896		5.3%
Not Hispanic or Latino	16,016		94.7%
Total housing units			
	9,096		

Source: U.S. Census Bureau, Population Estimates, July 1, 2024 American Community Survey 5-Year Estimates

The U.S Census Bureau, 2023 Language Spoken at Home Shows 1.7% Spanish Speaking at home. With 2.6% of the total population speaking a language other than English.

<https://data.census.gov/table/ACSST5Y2023.S1601?t=Language+Spoken+at+Home&g=050XX00US41001>

S1601 | Language Spoken at Home

Filters

American Community Survey2023- ACS 5-Year Estimates Subject Tables

Notes

Geos

Topics

Codes

Dataset

Year

Columns

Transpose

Margin of Error

Restore

Excel

CSV

ZIP

Cite

More Tools

Results

Label	Baker County, Oregon									
	Total		Percent		Percent of specified language speakers					
	Estimate	Margin of Error	Estimate	Margin of Error	Speak English only or speak English "v..."		Percent speak English only or speak E...		Speak English less than "very well"	
					Estimate	Margin of Error	Estimate	Margin of Err...	Estimate	Margin
Population 5 years and over	16,031	±46	(X)	(X)	15,944	±65	99.5%	±0.3	87	
Speak only English	15,610	±116	97.4%	±0.7	(X)	(X)	(X)	(X)	(X)	
Speak a language other than English	421	±111	2.6%	±0.7	334	±107	79.3%	±10.5	87	
SPEAK A LANGUAGE OTHER THAN E...										
Spanish	277	±75	1.7%	±0.5	218	±75	78.7%	±13.8	59	
Other Indo-European languages	106	±67	0.7%	±0.4	93	±61	87.7%	±19.0	13	
Asian and Pacific Island languages	38	±30	0.2%	±0.2	23	±26	60.5%	±42.9	15	
Other languages	0	±21	0.0%	±0.2	0	±21	-	**	0	
CITIZENS 18 YEARS AND OVER										
All citizens 18 years old and over	13,331	±96	(X)	(X)	13,271	±103	99.5%	±0.2	60	
Speak only English	12,969	±135	97.3%	±0.7	(X)	(X)	(X)	(X)	(X)	
Speak a language other than English	362	±100	2.7%	±0.7	302	±94	83.4%	±8.7	60	
Spanish	243	±78	1.8%	±0.6	211	±74	86.8%	±9.3	32	
Other languages	119	±55	0.9%	±0.4	91	±49	76.5%	±19.7	28	

4.2 LANGUAGE ASSISTANCE:

CCNO Baker County does not provide ongoing language assistance training for staff. However, efforts are made to accommodate LEP individuals.

- Use of schedules, service guides, and other information available in Spanish.
- Use of Oregon Relay Spanish TTY service information on CCNO publications and website.
- Use of 'I Speak' cards by office staff and bus drivers. (available from US census website)
- 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
 - This strategy is not optimal for some situations involving personal crisis, or sharing financial information, as that is not a comfortable circumstance to place the child in. However, for simple requests, such as ride scheduling, CCNO Baker County believes negative impact on the customer is minimal.

5.0 Minority Representation

At the time of this policy, there are no transit-related committees selected by CCNO Baker County. If such committee be formed, a representative table will be produced and added as an attachment to this policy.

6.0 DEVIATED FIXED ROUTE SERVICE STANDARDS

CCNO Baker, as a subrecipient providing a deviated fixed route service, must determine service standards, including frequency of service, age and quality of vehicles assigned to routes, quality of amenities serving the routes, or the location of routes in a non-discriminatory manner. Service decisions shall not be made on the basis of race, color, or national origin.

6.1 Service Standards

Vehicle Load

The average of all loads during the peak operating period should not exceed vehicles' achievable capacities, which are 14-18 passengers for a 22' cutaway van (based on seating).

Vehicle Headway

Service operates on weekdays and Saturdays, with one-hour headways. Saturday service has only been available as funding resources allow.

Scheduling involves the consideration of a number of factors including: ridership productivity, transit/pedestrian friendly streets, density of transit-dependent population and activities, relationship to local transportation plans, relationship to major transportation developments, land use connectivity, and transportation demand management.

On-time Performance

It is the goal of CCNO Baker County to have Eighty-five (85) percent of the CCNO Baker's transit vehicles to depart no more than 5 minutes late in comparison to the established schedule/published timetables.

Service Availability

CCNO Baker will distribute transit service so that 67% of all residents in the service area are within a ¼-milewalk of bus service.

Transit Amenities for each mode

CCNO Baker must determine the distribution of transit amenities or the vehicle assignments for each mode in a non-discriminatory manner to ensure service is not distributed on the basis of race, color or national origin.

Installation of transit amenities along bus routes are based on the number of passenger boardings at the stops along those routes. At the time of this policy, no stops record sufficient boardings to warrant bus shelters, however, shelters can be placed at most frequently used stops, or stops where no natural shelters are present, as resources allow.

Vehicle assignments for each mode

Vehicles will be assigned such that the average age of the fleet serving each depot does not exceed 20 years. All fixed-route busses will be equipped with heating and air conditioning, and equipped with ADA compliant lifts or ramps, and wheelchair securement devices.

Bus assignments take into account the operating characteristics of buses of various lengths, which are matched to the operating characteristics of the route.

APPENDIX A: Title VI Notifications

Title VI Notice

Community Connection Northeast Oregon – Baker County

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 Community Connection Northeast Oregon.

For more information on Community Connection Northeast Oregon civil rights program, and the obligations and procedures to file a complaint please contact us at (541) 523-6591, email <mailto:ada.titlevi@ccno.org>, visit our direct service office at 2810 Cedar St., Baker City, Oregon or visit our website at www.CCNO.org/baker.

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.

Título VI Aviso

Northeast Oregon Public Transit – Condado de Baker

Community Connection of Northeast Oregon, Inc. opera servicios de conformidad con el Título VI de la Ley de Derechos Civiles. Sus programas se ofrecen sin distinción de raza, color o nacionalidad de origen.

Cualquier persona que considere que ha sido objeto de una práctica discriminatoria ilegal puede presentar una queja ante Community Connection of Northeast Oregon.

Para más información sobre el programa de derechos civiles de Community Connection of Northeast Oregon, así como las obligaciones y procedimientos para presentar una queja, comuníquese con nosotros al (541) 523-6591, por correo electrónico a ada.titlevi@ccno.org, visítenos en nuestra oficina de servicios directos en 2810 Cedar St., Baker City, Oregon, o consulte nuestro sitio web en www.CCNO.org/baker.

Un demandante también puede presentar una queja directamente ante la Administración Federal de Tránsito (Federal Transit Administration – FTA), Oficina de Derechos Civiles, A la atención de: Coordinador del Programa del Título VI, Edificio East, 5º Piso – TCR, 1200 New Jersey Avenue, SE, Washington DC, 20590.

APPENDIX B: Complaint Form



NORTHEAST OREGON PUBLIC TRANSPORTATION

Title VI (CIVIL RIGHTS) and Title II (ADA) 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 different 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? Yes or No

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:

Mail to:

Transportation Prog. MG
Attn: Title VI/ADA Complaint
2802 Adams Ave.
La Grande, OR 97850

Email with the subject "Attn: Title VI/ADA Complaint"

<mailto:ada.titlevi@ccno.org>

APPENDIX C: Title VI Manual Complaint Log

[illegible]

APPENDIX D: Title VI Statement

Community Connection



Of Baker County
Community Connection of Northeast Oregon, Inc

Community Action Agency
Area Agency on Aging (Dist. 13)
Community Housing Development Organization
Youth and Inter-generational Program Agency

*"Helping People,
Changing Lives"*

July 1, 2024

To Whom It May Concern,

This is to verify that Baker CCNO – Baker County, a program of Community Connection of Baker County, has received no complaints for civil rights violations under the Title VI policy during the past three years.

Sincerely,

Joe Hayes
Baker County Operations Manager
(541) 523-6591
joe@ccno.org

Baker County Office: 2810 Cedar St., Baker City OR 97814 . . . Phone (541)523-6591 . . . Fax (541)524-1221