

# OKANOGAN COUNTY TRANSIT AUTHORITY TITLE VI POLICY

## TITLE VI PLAN FOR THE FEDERAL TRANSIT

### ADMINISTRATION

#### TITLE VI COMPLAINT PROCEDURES

##### **What is Title VI of the Civil Rights Act of 1964?**

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color and national origin in programs and activities receiving Federal financial assistance.

Okanogan County Transit Authority is committed to ensuring that no person is excluded from participation in, or denied benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI Federal Transit Administration (FTA) Circular 4702.1.A. If you believe you have been subjected to discrimination under Title VI, you may file a complaint.

##### **How to file a Title VI Complaint?**

You may file a signed, written complaint one hundred and eighty (180) days from the date of the alleged discrimination. The complaint should include the following information:

- Your name, mailing address, and how to contact you (i.e., telephone number or email address)
- How, when, where and why you believe you were discriminated against. Include the location, names and contact information of any witnesses
- Other information that you deem significant

The complaint may be filed in writing with Okanogan County Transit Authority at the following address:

Okanogan County Transit Authority  
Attn: Kelly Scalf  
P.O. Box 507  
Okanogan, WA 98840  
By Phone: (509)557-6177  
By Email: [kscalf@okanogantransit.com](mailto:kscalf@okanogantransit.com)

Note: Okanogan County Transit Authority encourages all complaints to certify all mail that is sent through the US Postal Service and/or ensure that all written correspondence can be tracked easily. For complaints originally submitted by facsimile, an original, signed copy of the complaint must be mailed to Kelly Scalf as soon as possible, but no later than 180 days from the alleged date of discrimination.

What happens when I submit my complaint to Okanogan County Transit Authority?

All complaints alleging discrimination based on race, color, or national origin in a service or benefit provided by Okanogan County Transit Authority will be directly addressed by Okanogan County Transit Authority. Okanogan County Transit Authority shall also provide appropriate assistance to complaints, including those persons with disabilities, or who are limited their ability to communicate in English. Additionally, Okanogan County Transit Authority shall make every effort to address complaints in an expeditious and thorough manner.

In instances where additional information is needed for investigation of the complaint, Okanogan County Transit Authority will contact the complainant in writing. Please note that in responding to any requests for additional information, a complainant's failure to provide the requested information will result in administrative closure of the complaint.

Once sufficient information for investigation the complaint is received by Okanogan County Transit Authority, a written response will be drafted subject to review by the transit's attorney. If appropriate, Okanogan County Transit Authority's attorney may administratively close to complaint. In this case, Okanogan County Transit Authority will notify the complainant of the action as soon as possible.

**How will I be notified of the outcome of my complaint?**

Okanogan County Transit Authority will send a final written response to the complainant and advise the complainant of his or her right to 1) appeal within 7 calendar days of receipt of the final written decision from Okanogan County Transit Authority, and/or 2) file a complaint externally with the U.S. Department of Transportation and/or the Federal Transit Administration. Every effort will be made to respond to Title VI complaints within 60 working days of receipt of such complaints, if not sooner.

In addition to the complaint process described above, a complainant may file a Title VI complaint with the following offices:

Office of Civil Rights	Director
Federal Transit Administration	FTA Office of Civil Rights
915 Second Avenue, Ste 3142	East Building, 5th Floor
Seattle, WA 98174	1200 New Jersey Ave, SE
Phone: 206-220-7954	Washington, DC 20590
Fax: 206-220-7959	

**RECORD OF TITLE VI INVESTIGATIONS, COMPLAINTS OR LAWSUITS**

To date, there have been no Title VI investigations, complaints or lawsuits.

## LIMITED ENGLISH PROFICIENCY (LEP) PLAN

Okanogan County Transit Authority is committed to breaking down language barriers by implementing consistent standards of language assistance across its service area.

**Census.** The United States is home to millions of national origin minority individuals who are LEP. That is, their primary language is not English and they cannot speak, read, write or understand the English language at a level that permits them to interact effectively with recipients of Federal financial assistance. Because of language differences and the inability to effectively speak or understand English, persons with LEP may be subject to exclusion from programs or activities, experience delays or denials of services. These individuals may be entitled to language assistance with respect to a particular type of service. The federal government and those receiving assistance from the federal government must take reasonable steps to ensure that LEP persons have meaningful access to the programs, services, and information those entities provide. This will require agencies to establish creative solutions to address the needs of this ever-growing population of individuals, for whom English is not their primary language. According to the 2012 Census Data for Okanogan County, Spanish is spoken by 7.9% of the population.

### ANALYSIS OF FACTORS

Factor No. 1: The nature and importance of service provided by Okanogan County Transit Authority. Okanogan County Transit Authority will provide important transit services to the public through its fixed route, paratransit, and vanpool programs. currently contracting limited service with OCTN.

Factor No. 2: The number or proportion of LEP persons in the service area. The vast majority of the population with which we will do business (individuals wishing to ride transit) are expected to be proficient in English, so that LEP services are not normally required. No information was available regarding the percentage of bilingual residents of the county.

Factor No. 3. The frequency with which LEP individuals come into contact with the service. All contacts with Okanogan County Transit Authority will be made through its administrative office located in Omak, Wa, and scheduling office located at 303 2nd Ave S, Suite A in Okanogan. We plan to serve LEP persons daily via our buses, contracted services, paratransit, demand response services, and vanpool program. In a joint effort to serve LEP persons, calls/contacts from LEP individuals will be handled by OCTN who is our contracted service provider and sent to our administrative office for tracking purposes and to be logged.

Factor No. 4. The resources available to the recipient of the federal funds to assure meaningful access to the service by LEP persons. Okanogan County Transit Authority's currently contracts service with OCTN. The Okanogan County Transit Authority currently does not have a spanish speaking staff, but will contact the local DSHS office when an interpreter is needed. Okanogan County Transit Authority will provide a number of publications in both English and Spanish and prints Special Notices of public meetings and other events in Spanish.

## **IMPLEMENTATION PLAN**

Okanogan County Transit has not completely been implemented, and is in the process of drafting and implementing all of the operational and regulatory policies and procedures required. When OCTA fully implements the plan, it will be reviewed annually, and LEP data will be tracked to determine what steps are appropriate in following years. We identify LEP persons in the service area by ridership, telephone contact counts, neighborhood demographics, general awareness surveys and on-board surveys. Okanogan County Transit Authority's Title VI Policy and a Complaint Form will soon be available on our website. By October 1, 2015, all printed maps and schedules will have Title VI language and Okanogan County Transit Authority's website will be posted. If there is a service change, we will run notices in the newspaper in Spanish and in English. We also will have flyers on the bus which are printed as the information changes (not at any particular time but rather as route, schedule or fare information changes or when we run out of flyers). In order to comply with 49 CFR 21.9(d), Okanogan County Transit Authority and its sub-recipients must provide information to beneficiaries regarding their Title VI obligations and inform beneficiaries of the protections against discrimination afforded them by Title VI.

**OKANOGAN COUNTY TRANSIT AUTHORITY** has established a statement of rights and a policy statement.

**NOTIFYING BENEFICIARIES OF THEIR RIGHTS UNDER TITLE VI** Our website will include our Title VI policy and complaint form. The web site will also state: **OKANOGAN COUNTY TRANSIT AUTHORITY** does not discriminate on the basis of race, color or national origin.

Okanogan County Transit Authority no discrimina en base de raza, color o origen nacional.

A copy of Okanogan County Transit Authority's Title VI Policy and Complaint Form will be available at our administrative office located at 303 2nd Ave S, Suite A in Okanogan, WA, and at our scheduling office located at 303 2nd Ave S, Suite A in Okanogan, WA.

## **INCLUSIVE PUBLIC PARTICIPATION**

Community Outreach is a requirement of Title VI. Recipients and sub-recipients shall seek out and consider the viewpoints of minority and low-income populations in the course of conducting public outreach. Recipients have wide latitude to determine what specific measures are most appropriate and should make this determination based on the composition of the affected population, the public involvement process, and the resources of Okanogan County Transit Authority. Okanogan County Transit Authority will engage the public in its planning and decision-making processes, as well as its marketing and outreach activities and will include the Washington State Migrant Council, Opportunities Industrialization Council, and the Omak County Developmental Disabilities Program for input.

## **CUSTOMER COMPLAINT PROCESS**

Citizens may contact Okanogan County Transit Authority to lodge a complaint or comment. All complaints/comments are put into a database, researched, followed-up and a response is made to the citizen. This process can be initiated by calling Okanogan County Transit Authority at (509)557-6177, or by visiting the administration office located at 303 2nd Ave S, Suite A in Okanogan, WA.

As a brand new transit system,  
we will be submitting this for  
review. Drafted on 11/14