

TITLE VI PROGRAM

LINN COUNTY SPECIAL/RURAL TRANSPORTATION PROGRAM LINN COUNTY AS THE DESIGNATED LOCAL STATEWIDE TRANSPORTATION IMPROVEMENT FUND (STIF) AGENCY

2023-2025

Linn County Special/Rural Transportation Program Title VI Coordinator
c/o Linn County Board of Commissioners
Room 201 Linn County Courthouse
P.O. Box 100

Albany, Oregon 97321

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1. Title VI Notice to the Public

Linn County Special/Rural Transportation Program

Title VI Notice to the Public

The Linn County Special/Rural Transportation Program gives public notice of its policy to uphold and assure full compliance with the non-discrimination requirements of Title VI of the Civil Rights Act of 1964 and related Nondiscrimination authorities. Linn County Special/Rural Transportation Program operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act.

Any person who desires more information regarding the Title VI Program can contact its Title VI Program Coordinator with the Office of Civil Rights - at the address noted below.

Any person who believes they have, individually or as a member of any specific class of persons, been subjected to discrimination on the basis of race, color, or national origin has the right to file a formal complaint. Any such complaint must be in writing and submitted within 180 days following the date of the alleged occurrence to:

Linn County Special/Rural Transportation Program Title VI Coordinator
c/o Linn County Board of Commissioners
Room 201 Linn County Courthouse
P.O. Box 100
Albany, Oregon 97321

Email: rmaudlin@co.linn.or.us

Phone: 541-409-4494

Facsimile: 541-967-4651

A Spanish version and a combined English/Spanish version of this document are located in Section 10, Vital Documents in Spanish.

The foregoing Title VI Notice (or its combined English/Spanish counterpart) is available to the public in the following locations:

- On Linn County's website: <https://www.linncountyor.gov/bc-tac>
- In Linn County Board of Commissioner's Office

2. Title VI Complaint Procedures and Form

Introduction

The complaint procedures outlined herein apply to the Linn County Special/Rural Transportation Program and other primary recipients and sub-recipients of Federal financial assistance. These procedures cover discrimination complaints filed under Title VI of the Civil Rights Act of 1964, Civil Rights Restoration Act of 1987, Section 504 of the Rehabilitation Act of 1973, and other non-discrimination authorities relating to any program, services, or activities administered by the Linn County Special/Rural Transportation Program and the county's sub-recipients, consultants, and contractors.

The Linn County Special/Rural Transportation Program will make every effort to obtain early resolution of complaints at the lowest level possible. Complaints of alleged discrimination will be investigated by the appropriate authority. The option of informal mediation meeting(s) between the affected parties and the Linn County Special/Rural Transportation Program Title VI Coordinator may be utilized for resolution. Upon completion of each investigation, the Linn County Special/Rural Transportation Title VI Coordinator will inform every complainant of all avenues of appeal.

The purpose of these discrimination complaint procedures is to describe the process used by the Linn County Special/Rural Program for processing complaints under Title VI of the Civil Rights Act of 1964, related statutes and authorities.

Complaint Procedure

1. Any person who believes he or she, individually, as a member of any specific class, or in connection with any disadvantaged business enterprise, has been subjected to discrimination prohibited by Title VI of the Civil Rights Act of 1964, the American with Disabilities Act of 1990, Section 504 of the Vocational Rehabilitation Act of 1973, or the Civil Rights Restoration Act of 1987, as amended, may file a complaint with the Linn County Special/Rural Transportation Program. A complaint may also be filed by a representative on behalf of such a person. All complaints will be referred to the Linn County Special/Rural Transportation/Title VI Coordinator for review and action.
2. In order to have the complaint considered under this procedure, the complainant must file the complaint no later than 180 days after:
 - a) The date of alleged act of discrimination; or
 - b) Where there has been a continuing course of conduct, the date on which that conduct was discontinued.

In either case, the Linn County Special/Rural Transportation Program may extend the time for filing or waive the time limit in the interest of justice, as long as the Linn County Special/Rural Transportation Program specifies in writing the reason for so doing.

3. Complaints shall be in writing and shall be signed by the complainant and/or the complainant's representative. If the Complainant is unable to reduce the complaint to writing, please contact the Title VI Coordinator using the information below, and a staff member will help dictate the complaint or provide other necessary assistance. Complaints shall set forth as fully as possible the facts and circumstances surrounding the alleged discrimination. In the event a person makes a verbal complaint of discrimination to the Linn County Special/Rural Transportation Program Title VI Coordinator, the Coordinator will assist, if necessary, the person in transcribing the complaint into written form. The signed written complaint shall then be handled according to Linn County Special/Rural Program's investigative procedures.
4. Complaints may be submitted to Reagan Maudlin, the Linn County Special/Rural Transportation Program Title VI Coordinator via the following:

Linn County Special/Rural Transportation Program Title VI Coordinator
c/o Linn County Board of Commissioners
Room 201 Linn County Courthouse
P.O. Box 100
Albany, Oregon 97321
Email: rmaudlin@co.linn.or.us
Phone: 541-409-4494
Facsimile: 541-967-4651

5. Within 15 days, the Linn County Special/Rural Transportation Program Title VI Coordinator will acknowledge receipt of the allegation.
6. The Linn County Special/Rural Transportation Coordinator Program Title VI Coordinator will conduct an investigation of the allegation and based on the information obtained. Any witnesses or parties to the investigation will be interviewed.
7. Within 90 days of receipt of the complaint, the Linn County Special/Rural Transportation Program Title VI Coordinator will notify the complainant in writing of the final decision reached, including the proposed disposition of the matter. The notification include specific reasons for the decision made, and will advise the complainant of his/her appeal rights if they are dissatisfied with the final decision rendered by Linn County Special/Rural Transportation Program.
8. The Linn County Special/Rural Transportation Program Title VI Coordinator will also provide the Board of Commissioners with a copy of this decision and summary of findings upon completion of the investigation.
9. If the complainant wishes to appeal the decision, they may simply inform the Title VI Coordinator (via writing, phone, or email), and further information on the appeals process will be forwarded.
10. The complainant may also choose to file their complaint to either of the following:

Mail: Oregon Department of Transportation
Office of Civil Rights
Oregon Department of Transportation
Attn. Title VI Officer
955 Center St. NE, Suite 471
Salem, Oregon 97301

Phone: 503-986-4350

Facsimile: 503-986-6382

Or:

Mail: Federal Transit Administration, Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, 5th Floor – TCR
1200 New Jersey Avenue SE
Washington, DC 20590

Complaint Form

**Linn County Special/ Rural Transportation Program
 Combined Civil Rights Complaint Form for
 Title VI and ADA**

Section I:		
Name:		
Address:		
Telephone (Home):	Telephone (Work):	
Electronic Mail Address:		
Accessible Format Requirements?	<input type="checkbox"/> Large Print	<input type="checkbox"/> Audio Tape
	<input type="checkbox"/> TDD	<input type="checkbox"/> Other
Section II:		
Are you filing this complaint on your own behalf?	<input type="checkbox"/> Yes*	<input type="checkbox"/> No
<i>*If you answered "yes" to this question, go to Section III.</i>		
If not, please supply the name and relationship of 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.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Section III:		
I believe the discrimination I experienced was based on (check all that apply):		
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin <input type="checkbox"/> Disability		
Date of Alleged Discrimination (Month, Day, Year): _____		
Explain as clearly as possible what happened and why you believe you were discriminated against. 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 more space is needed, please use the back of this form.		
<hr/> <hr/> <hr/>		
Section IV:		
Have you previously filed a Discrimination Complaint with this agency?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, please provide any reference information regarding your previous complaint.		
<hr/> <hr/>		
Section V:		
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?		
<input type="checkbox"/> Yes <input type="checkbox"/> No		

If yes, check all that apply:	
<input type="checkbox"/> Federal Agency: _____	
<input type="checkbox"/> Federal Court: _____	<input type="checkbox"/> State Agency: _____
<input type="checkbox"/> State Court: _____	<input type="checkbox"/> Local Agency: _____
Please provide information about a contact person at the agency/court where the complaint was filed.	
Name:	
Title:	
Agency:	
Address:	
Telephone:	
Section VI:	
Name of agency complaint is against:	
Name of person complaint is against:	
Title:	
Location:	
Telephone Number (if available):	

You may attach any written materials or other information that you think is relevant to your complaint. Signature and date are required below.

Signature

Date

Please forward your Complaint to the following:

Linn County Special/Rural Transportation Program
 Title VI Coordinator, c/o Linn Co. Board of Commissioners
 Room 201, Linn County Courthouse
 P.O. Box 100
 Albany, Oregon 97321
 (541) 409-4494
 (541) 967-4651

3. Title VI Investigations and Complaints

There are currently no complaints, investigations, or lawsuits related to Title VI for Linn County Special/ Rural Transportation Program (LCSRTP). There have been no such complaints, investigations, or lawsuits in recent memory, dating at least back to the 2019 Title VI Program.

In the future event of a complaint or lawsuit being filed within the Transit Program, a log will be maintained to include the following information (as required by FTA C 4702.1B): date the complaint/lawsuit was filed, a summary of the allegation(s), status of the investigation, and actions taken by in response to the complaint, lawsuit, or investigation. In addition to the required information, LCSRTP will also collect the same information for any Title VI Complaint filed against any subrecipient or transportation provider of the agency.

4. Public Participation Plan

Public involvement provides the important opportunity to enhance the quality of transportation planning, programming and project implementation.

Consistent with federal rules and policies, the Oregon Transportation Plan includes the important policy “to involve Oregonians to the fullest practical extent in transportation planning and implementation in order to deliver a transportation system that meets the diverse needs of the state”.

Goal

The public involvement goal of the Linn County Special/Rural Transportation Program, consistent with the Bylaws of the Linn County Transportation Advisory Committee approved by the Linn County Board of Commissioners, is to promote public awareness, information and education regarding transportation needs of Linn County residents and the services available to address them; and to increase public involvement by all resident of Linn County in planning, development and funding decisions related to public transportation.

This goal was included in the Linn County Coordinated Public Transit-Human Services Transportation Plan, noting the strong local commitment to support and encourage public participation beyond state and federal planning requirements.

Objectives

Consistent with, and in support of, the Public Involvement and Consultation Policy of the Oregon Transportation Plan:

- In all phases of decision-making, provide residents early, open, continuous and meaningful opportunity to influence decisions about proposed transportation activities.
- Consult with state and federal agencies, Area Commissions on Transportation, elected officials, local advisory commissions and committees and other stakeholder groups.
- Seek out and facilitate the involvement of those potentially affected including traditionally underserved populations.
- Provide on-going communication to state and federal agencies, local governments and the public regarding local, state and federal goals, policies and the implementation of plans.
- Provide all residents, regardless of race, color, national origin, sex, age, disability, income or limited English proficiency equal access to transportation planning and decision-making.

Specific Strategies

To achieve the goals and address the objectives, different strategies and approaches will be used depending on the nature of the planning, development and funding activity. The strategies listed below will evolve over time, be amended and added to; and are not meant to limit the development of creative and timely strategies in the coming years.

- The active involvement of the Linn County Transportation Advisory Committee is a critical element of an effective public involvement effort. As indicated in the Bylaws, the Board of Commissioners has charged members with the responsibility to ensure an informed lay and professional citizen perspective of transportation program administration, quality of service and prioritization of service delivery and service needs. All meetings, of course, are open to the public with times and agendas posted in local newspapers. Public notices are published regarding grant opportunities and allocations.
- Elected officials, and their appointed advisory committee members, from cities in Linn County play a very important role in assessing needs, recommending programs and projects to address the needs, developing and funding local transportation programs and helping coordinate services with other jurisdictions and volunteer-based programs. They are often the first contact point for local residents and play an important role in gathering and sharing information. Specific methods to more directly include these partners, and better coordinate public information and involvement, continue to be developed.
- Regional partners also play an important role in public involvement. This includes the Cascades West Disability Services Advisory Council, the Cascades West Senior Services Advisory Council, the Cascades West RideLine Brokerage Advisory Committee, the Cascades West Area Commission on Transportation, the Linn-Benton Loop Governing Board, the Linn County Department of Health Services, the Linn-Benton Hispanic Advisory Committee and the Linn-Benton Health Equity Alliance. Outreach efforts are also important with the Special Transportation Programs in Benton County and Lincoln County. In addition to meetings, these partners can use their newsletters, mailing lists and websites to share information, to seek information and promote involvement on a variety of transportation topics.
- The senior centers in local communities have direct and very specific daily contact with a large number of people with transportation and human services needs, as well as volunteers who can help address these needs. Printed information can easily be shared at these facilities. Meetings regarding specific topics can be held at the senior centers.
- It is particularly important to reach out to low-income individuals and households and to people who represent them. The assistance of Oregon Cascades West Council of Governments is a particularly good partner in this strategy.

- Volunteer-based groups play a particularly important role in representing and involving traditionally underrepresented populations. This includes the Volunteer Caregivers program.
- The publication of notices in the local newspaper will continue to be an important opportunity to inform residents about grant opportunities, proposed allocation of grant funds and updates to planning documents.

LINN COUNTY's Public Involvement Philosophy

Linn County welcomes and values public involvement. Linn County believes that well-designed, proactive public involvement improves its planning and policy efforts and ultimately leads to better decisions, better projects, and maximized, long-term public benefits. Creating long-term, sustainable systems requires Linn County to embrace outside skills and knowledge, including input from the public. Advantages of enhanced public involvement include:

- Increased public collaboration. Citizen collaboration on projects benefits Linn County's processes and outcomes, promoting public participation and respectful, productive dialogue.
- Decisions that better reflect diverse interests. Consulting with all identifiable interests helps Linn County better understand and reflect the full range of community values and livability standards.
- Efficient transportation decision implementation. Early public involvement fosters better decision making and reduces costly project plan revisions and change orders.
- Enhanced agency credibility. Increased public involvement results in more meaningful and better interactions between Department personnel and customers. This interaction aids everyone. Linn County better understands public concerns, and customers gain an appreciation of the Department and its responsibilities.
- Linn County proactively involves the public in addressing transportation issues. The agency communicates its mission and goals to the widest audience possible and considers feedback received from transportation stakeholders and the public.

Linn County embraces several specific goals:

- Provide for open and continuous communication to incorporate public input into decision-making and inform the public of planning, program functions, project activities, designs, and construction.
- Consult with local governments in identifying transportation needs, coordinating projects, and selecting viable solutions.
- Provide public input opportunities in developing the State Long Range Transportation Plan and the State Transportation Improvement Program.
- Respond quickly and transparently to concerns expressed about Linn County activities and educate the public about transportation programs and issues.
- Review and update public involvement strategies and process as needed, continuously evaluate public outreach activity effectiveness, and use the results to improve the program.

- Ensure minorities and low-income populations have opportunities to participate in the public involvement process.
- Foster internal communication and training to promote public involvement process understanding and implementation.

Linn County periodically reviews its public involvement processes for effectiveness. Striving for continuous improvement, every five years Linn County requests comments from county officials, transportation providers, Oregon Cascades West Council of Governments, and the general public.

LINN COUNTY Public Meeting Locations are Selected Based on the Goal of Diverse Public Involvement

In order to maximize public participation, especially from diverse population, Linn County uses guidelines when selecting locations and schedules for public meetings. Linn County makes every attempt to:

- Schedule meetings at times and locations that are convenient and accessible for minority and LEP communities;
- Employ different meeting sizes and formats including town hall type meeting formats;
- Coordinate with community organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities;
- Consider radio, television, social media, or newspaper ads that serve LEP populations;
- Educate on public transportation options available to and from the meeting if requested;
- Provide opportunities for public participation through means other than written communication, such as one-on-one interviews, phone calls, or use of audio or video recording devices to capture oral comments.

Minority, Low-Income, and LEP Participation in Environmental Justice Issues

The Linn County public involvement process must conform to the U.S. Department of Transportation (USDOT)/(FHWA) Order 6640.23A (June 14, 2012) that establishes policies and procedures for complying with Executive Order 12898 (February 11, 1994) “FHWA Actions to Address Environmental Justice in Minority Populations and Low-Income Populations”.

This directive requires Linn County to identify and prevent discriminatory effects caused by a proposed action. The public process must:

- Obtain information on the population type a proposed action serves or affects.
- Identify and address disproportionately high and adverse environmental effects a proposed action will have on minority and low-income populations.
- Provide minorities and low-income populations opportunity to participate.
- Solicit input from affected minority and low-income populations when evaluating alternatives.

- Disseminate information in an easily accessible manner for minorities and low-income populations.

Summary of Recent Outreach Efforts

Linn County's outreach events could be more successful in obtaining the feedback of the public, including minority and LEP populations. Although several avenues are available to access, the participation is relatively low from the general public including minority and LEP populations. This assessment is not uncommon amongst public offices that are similarly attempting to gain public participation and feedback.

Currently, outreach events and opportunity for feedback are focused on public meetings that address the transportation needs and funding opportunities in the area. These opportunities are advertised in the newspaper, on the Linn County website, and additional communications are sent directly to any party that has expressed interest. These public meetings are held at times and locations that are accessible to minority and LEP populations. There are multiple opportunities to be involved in every topic that is discussed; first at a publicly held Transportation Advisory Committee meeting, where recommendations are made for the Linn County Board of Commissioners; then again at the public Board of Commissioners meetings where the topic is addressed and formal decision is made. Both have public comment opportunity before the business is addressed.

Information about Public Transportation in Linn County is available on the Linn County website with a statement of accessibility and direct contact information for general public. Vital documents are available in alternative format for Spanish speakers.

Oregon Cascades West Council of Governments launched a project with the primary directive of connecting route information and live updates of Public Transportation Providers with modern resources such as the Transit App and Google services; both are free to access by the general public with all Public Transportation Service Providers in Linn County participating. A potential byproduct of this project is App users are requested to provide feedback at the conclusion of their experience. PTSPs are currently working with Oregon Cascades West Council of Governments to access this data which could then be collected by Linn County as a means to better understand the travel experience and needs of the general public, minority, and LEP populations.

5. Four Factor Analysis

What does it mean to be Limited English Proficient (LEP)?

LEP individuals do not speak English as their primary language and therefore have a limited ability to read, write, speak, or understand English. Many LEP persons are in the process of learning English and may read, write, speak, and/or understand some English, but not proficiently. LEP status may be context- specific – an individual may have sufficient English language skills to

communicate basic information (name, address etc.) but may not have sufficient skills to communicate detailed information in English.

Background

Federal law prohibits discrimination based on national origin. National origin discrimination includes discrimination based on a person's inability to speak, read, write or understand English. Recipients of Federal funds must provide meaningful access to LEP individuals.

On August 11, 2000, Executive Order 13166, titled, "Improving Access to Services by Persons with Limited English Proficiency," was issued. Executive Order 13166 requires Federal agencies to assess and address the needs of otherwise eligible persons seeking access to federally conducted programs and activities who, due to LEP cannot fully and equally participate in or benefit from those programs and activities. Section 2 of the Executive Order 13166 directs each Federal department or agency "to prepare a plan to improve access to...Federally conducted programs and activities by eligible LEP persons...."

Framework for Deciding when Language Services are Needed

Linn County Special/Rural Transportation Program will take the following steps to ensure meaningful access to its programs, services, and activities for LEP individuals in a manner that balances the following four factors.

FOUR-FACTOR ANALYSIS

The Four Factor Analysis is a local assessment that considers:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by Linn County;
2. The frequency with which LEP persons come into contact with Linn County services and programs;
3. The nature and importance of Linn County's services and programs in people's lives; and
4. The resources available to Linn County for LEP outreach, as well as the costs associated with that outreach.

Factor One: The number or proportion of LEP persons eligible to be serviced or likely to be encountered by Linn County.

The first step in determining the appropriate components of a Language Assistance Plan is understanding the proportion of LEP persons who may encounter Linn County's services, their literacy skills in English and their native language, the location of their communities and neighborhoods and, more importantly, if any are underserved as a result of a language barrier.

To do this, Linn County evaluated the level of English proficiency and to what degree people in its service area speak a language other than English and what those languages are. Data for this review is derived from the United States Census and the American Community Survey. The most recent data available for the state were the ACS 2017-2021 five-year estimates.

Service Area Overview

Linn County is home to 130,467 people (2022 U.S. Census estimates) within the 2,289 square miles encompassed by the county. 82.9% of the population are white and non-Hispanic. Latinos make up 10.6% of the county, and Native Americans 1.8%. The percentage of persons living below the poverty line is 12.1%.

About a dozen language groups are spoken in Linn County; however, several of these language groups have no members that speak English less than very well. Of the total county population, just 3,197 people, or 2.67%, speak English less than very well. A breakdown of the language groups, and those speaking English less than very well are shown below.

Total Population of Linn County		
	119,645	
Language Group	Number of people who speak the language and English less than very well	Percentage of County population that speaks the language and English less than very well
Spanish	2,660	2.22%
French, Haitian, or Cajun	11	0.01%
German or other West Germanic Language	62	0.05%
Russian, Polish, or other Slavic Languages	42	0.04%
Other Indo-European Languages	124	0.10%
Chinese (incl. Mandarin, Cantonese)	191	0.16%
Tagalog (incl. Filipino)	61	0.05%
Other Asian and Pacific Island languages	31	0.03%
Other unspecified languages	15	0.01%
Total number / percentage	3,197	2.67%

The Safe Harbor Provision

The U.S. Department of Transportation (U.S. DOT) has adopted the U.S. Department of Justice's Safe Harbor Provision. This provision outlines circumstances that can provide a "safe harbor" for U.S. DOT recipients (and sub-recipients) regarding translation of vital documents. Specifically, if a recipient provides written translation of vital documents for each LEP group that constitutes the lesser of 1,000 persons or five percent (5%) of the total population eligible to be served or likely to be affected or encountered, such action is considered strong evidence of compliance with the recipient's written translation obligations.

The Safe Harbor Provision only applies to the translation of written documents. It does not affect Linn County's requirement to provide meaningful access to LEP individuals through oral language services.

A vital document is any document that is critical for ensuring meaningful access to the recipients' major activities and programs by beneficiaries generally and LEP persons specifically. Whether or not a document (or the information it solicits) is "vital" may depend upon the importance of the program, information, encounter, or service involved, and the consequence to the LEP person if the information in question is not provided accurately or in a timely manner.

The data above shows that just one language meets the Safe Harbor threshold—Spanish. Linn County is home to 2,660 people (2.22% of the population) who speak Spanish, and speak English less than very well. The number of people who speak other languages and English less than very well all comprise under 0.20% of the population each.

Designation of Vital Documents

Based on the limited population of Spanish speakers who also speak English less than very well, Linn County designates the following as Vital Documents which be translated to Spanish: Title VI Notice to the Public, Combined Civil Rights Complaint Form (Title VI and ADA), Title VI Complaint Procedures, ADA Complaint procedures.

Factor Two: The frequency with which LEP persons come into contact with Linn County Special/Rural Transportation Services' programs.

Given that Linn County is a large organization that does not directly operate transit services, it is difficult to gauge precisely how much contact LEP persons have with Linn County services and programs. Linn County recognizes the importance of taking measures to gauge LEP needs. In the last few years, Linn County's Transportation Program has had significant staff turnover and vacancies in key positions, including that of the Transportation Coordinator/ Title VI Coordinator. However, Linn County recently hired a new Transportation Coordinator/ Title VI Coordinator.

Linn County is making strides to move forward in a positive direction. Oregon Cascades West Council of Governments launched a Seamless Transit program, partially funded by Linn County, that all PTSPs in the County are participating in. The primary objective of this project is to link Linn County's public transit with more modern tools to access route information such as live apps and Google services. A byproduct of this service is that riders using the Transit App are asked to fill out a brief survey and collects some information in what options the user is accessing, language may be a data point that we can collect by these means. This project is still relatively new and

PTSPs are actively working on ways to collect this data in a meaningful format from Oregon Cascades West Council of Governments, the partners that manage the project. As this develops, language data of ridership could potentially be requested from the PTSPs by Linn County. Ideally, by the time this Program is due for an update, Linn County will have more concrete data on language access needs to help direct future efforts and planning.

Factor Three: The Importance of Linn County's Service to People's Lives

Linn County's services likely affect every community member in some way. Specific to Public Transportation, Linn County acts as Qualified Entity for funds that are distributed to PTSPs. Through this relationship, Linn County offers resources to PTSPs in aligning services to have the broadest impact possible within the limitations of resources. Linn County has eight (8) lower level subrecipients of funds creating a collaborative service area that extends much farther than our largest city and reflects a sensitivity to low-income and disabled populations. Linn County has demonstrated a priority of service to impoverished and sparsely populated areas connecting people with critical resources that are only available in the more metropolitan areas; such as public assistance offices, large shopping, and hospitals. Although the services are available to all in the general public, many of the transportation providers in Linn County are seeing more riders of need than riders of choice. Striving to reach the greatest geographic area possible increases our potential reach to LEP persons.

LEP persons looking for employment with Linn County also need access to information from Linn County on employment opportunities. Further, some Disadvantaged Business Enterprises (DBEs) who seek to bid on Linn County projects likely have some LEP employees. Potential DBEs need to be able to access the certification process overseen by Linn County.

Finally, Linn County's planning process relies on input from the public. Linn County's services are therefore important to LEP person's lives, and must be accessible to everyone, regardless of ability to speak English.

Factor Four: Resources and Costs for LEP Outreach

Given that Linn County has a very limited number of LEP citizens, Linn County can meet the needs of its LEP population through relatively simple means. First, free resources include the use of Google Translate or other technology-based translation services. Linn County can utilize Google Translate to interpret simple comments or messages left on Linn County social media or other types of written communication received.

Linn County recognizes there will be times when professional interpretation or translation services are needed. In those cases where a citizen needs to communicate with Linn County in another language, Linn County employees have access to a telephonic interpretation service called Language Line. This is a pay-as-needed service under which Linn County is billed per minute for service. This makes the service affordable. Finally, Linn County will pay for document translation services when needed. For example, the Spanish translation of vital documents included in this Program were completed by a professional.

These resources give Linn County the ability to perform outreach with the LEP population at a reasonable cost.

Translation services through the Oregon Cascades West Ride Line, which maintains Spanish speaking capabilities, also provides some resources for other non-English language residents.

5. LEP Language Assistance Plan

Four Factor Analysis Results

As Described in section 5, Linn County's population reflects 0.20% of people who speak other languages and English less than very well. Because Linn County does not provide direct transportation services, it is difficult to determine how many LEP people are accessing the services or require assistance for meaningful access. Efforts continue to build a better understanding of how LEP populations are accessing services and if further action is necessary for meaningful access. Linn County has not had any direct reports of discrimination or complaints regarding access of transportation services from the LEP community in recent memory, dating at least back to the 2019 Title VI Program.

Providing Language Assistance

Linn County has vital documents in alternative language on the website. Resources are readily available to translate communications in writing with option of interpreter services as needed. The Special/Rural Transportation/Title VI coordinator is the primary contact and trained in accessing these resources and response measures.

Notice of Availability of Language Assistance

Information about accessibility is included in public notices and on meeting agendas with a contact listed. Documents on public participation opportunities published online also contain a statement of accessibility with a contact listed.

Monitoring and Evaluation of LAP

Efforts continue to build a better understanding of how LEP populations are accessing services and if further action is necessary for meaningful access. These efforts include reviewing demographic information about the area being served, coordination with ODOT Office of Civil Rights, reviewing any Civil Rights complaints of the County and PTSPs, and expanding data collection efforts of those accessing services.

Employee Training

Linn County does not provide any direct transportation services and therefore is not the first public facing entity for LEP persons accessing services. PTSPs are provided guidance and resources to develop their own robust TITLE VI plans and LEP Language Assistance Plans. Some resources are extended to PTSPs for translation services through the Oregon Cascades West Ride Line which maintains Spanish speaking capabilities and also provides some resources for other non-English language residents.

Employees of Linn County are trained to include accessibility statements in their public facing communications and to access resources described in section 5, factor 4 of this document, in

assisting non-English language persons for any communications that are sent directly to Linn County.

Summary of Language Assistance to LEP Persons

Linn County recognizes the importance of participation from the general public including LEP persons. Sensitivity to the LEP population is demonstrated through Linn County’s philosophy of service, outreach efforts, and resources dedicated to serving the LEP community. These priorities are further reflected in the oversight and assistance Linn County provides to it’s PTSPs regarding LEP participation and accessibility.

7. Advisory Committee Membership

Ken Bronson, Chair	Elderly/Disabled	Undisclosed Ethnicity
Marilyn Smith	Elderly	White (Caucasian)
Kindra Oliver	Provider/Senior/ Disabled/Low Income	White (Caucasian)
Dawn Mitchell	Provider/Senior/ Disabled/Low Income	Hispanic
JoAnn McQueary	Senior/Disabled/Low Income	Undisclosed Ethnicity
Barry Hoffman	Provider/Senior/ Disabled/Low Income	White (Caucasian)
Annie Holsworth	Transit User/Disabled	White (Caucasian)

8. Subrecipient Oversight for Title VI

To ensure that those of Limited English Proficiency can access and participate in planning, programming and decision-making processes, the Linn County Special/Rural Transportation Program has completed a four-factor analysis regarding the Language Assistance Plan. It is important to note that the Linn County Special/Rural Transportation Program does not directly provide public transportation services. Linn County supports the delivery of transportation services by public and non-profit agencies through planning efforts, coordination, technical support, grant administration and the allocation and management of grants.

Subrecipients are also required to have robust TITLE VI programs reflecting efforts to serve the LEP population. As part of the administrative oversight Linn County provides, these programs are reviewed no less than every three years and assistance is provided to ensure they are living documents that reflect an ongoing goal of accessibility and equity. Subrecipients are required to report to Linn County if they receive a complaint.

9. Title VI Equity Analysis Information

Currently there are no new facilities being planned, nor have any facilities been built anytime in recent memory that would fit into the intent of this requirement. However, if and when Linn County Special/Rural Transportation Program intends to build a facility that does warrant this scrutiny, and for which a NEPA process has not been required, Linn County will complete a Title VI equity analysis during the planning stage with regard to where a project is to be located to ensure the location is selected without regard to race, color, or national origin. Impacts of various location alternatives, and the analysis will occur before the selection of the preferred site.

10. Vital Documents in Spanish

Linn County Special/Rural Transportation Program Title VI Notice to the Public

The Linn County Special/Rural Transportation Program gives public notice of its policy to uphold and assure full compliance with the non-discrimination requirements of Title VI of the Civil Rights Act of 1964 and related Nondiscrimination authorities. Linn County Special/Rural Transportation Program operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act.

Any person who desires more information regarding the Title VI Program can contact its Title VI Program Coordinator with the Office of Civil Rights - at the address noted below.

Any person who believes they have, individually or as a member of any specific class of persons, been subjected to discrimination on the basis of race, color, or national origin has the right to file a formal complaint. Any such complaint must be in writing and submitted within 180 days following the date of the alleged occurrence to: (see below)

Programa de Transporte Rural/Especial del Condado de Linn Título VI Aviso al Público

El Programa de Transporte Rural/Especial del Condado de Linn da aviso público de su política para defender y asegurar el pleno cumplimiento de los requisitos de no discriminación del Título VI de la Ley de Derechos Civiles de 1964 y las autoridades de no discriminación relacionadas. El Programa de Transporte Rural/Especial del Condado de Linn opera sus programas y servicios sin distinción de raza, color u origen nacional de acuerdo con el Título VI de la Ley de Derechos Civiles.

Cualquier persona que desee obtener más información sobre el Programa del Título VI puede comunicarse con el Coordinador del Programa del Título VI en la Oficina de Derechos Civiles, en la dirección que se indica a continuación.

Cualquier persona que crea que, individualmente o como miembro de cualquier clase específica de personas, ha sido objeto de discriminación por motivos de raza, color u origen nacional tiene derecho a presentar una queja formal. Cualquier queja de este tipo debe realizarse por escrito y presentarse dentro de los 180 días siguientes a la fecha del presunto suceso a:

Linn County Special/Rural Transportation Program Title VI Coordinator
c/o Linn County Board of Commissioners
Room 201 Linn County Courthouse
P.O. Box 100
Albany, Oregon 97321

Email: rmaudlin@co.linn.or.us

Phone: 541-409-4494

Facsimile: 541-967-4651