

Senior Citizens of Sweet Home, Inc.

TITLE VI PROGRAM POLICY September 14, 2018

Updated 1/11/2021

Reference. Circular 4702.1B *Title VI and Title VI Dependent Guidelines for Federal Transit Administration Recipients, 2012*; Oregon Department of Transportation, *Handbook: Title VI of the Civil Rights Act, 2013*.

Purpose. The purpose of this policy is to establish guidelines to effectively monitor and ensure that the Senior Citizens of Sweet Home, Inc. is following all Federal Transit Administration (FTA) and Oregon Department of Transportation (ODOT) Title VI requirements and regulations in order to carry out the provisions of the United States Department of Transportation's (USDOT) Title VI Regulations at 49 DFT Part 21.

The Senior Citizens of Sweet Home, Inc. defines discrimination as any act or omission of an act which would prevent the use of or exclude a person from access to public transportation based on (but limited to) race, color, or national origin.

Policy. Senior Citizens of Sweet Home, Inc. is committed to creating and maintaining public transit service that is free of all forms of discrimination. The agency will take whatever preventive, corrective and disciplinary action necessary for behavior that violates this policy or the rights and privileges it is designed to protect. The Senior Citizens of Sweet Home, Inc. programs, policies, and activities shall comply with the USDOT and ODOT Title VI regulations.

Annual Title VI certification and assurance. To ensure accordance with 49 CFR Section 21.7, every application for financial assistance from FTA must be accompanied by and assurance that the applicant will carry out the program in compliance with Title VI of the 1964 Civil Rights Act. This requirement shall be fulfilled when the applicant submits its annual certifications and assurances to FTA. The text of FTA's annual certifications and assurances is available on FTA's web site. The Senior Citizens of Sweet Home, Inc. complies with this instruction by providing certification to ODOT.

Required to notify beneficiaries of protection under Title VI. (See appendix #1, Title VI notice) In order to comply with 49 CFR Section 21.9(d), recipients provide information to the public regarding their Title VI obligations and apprise members of the public of the protections against discrimination afforded to them by Title VI. Recipients that provide transit service shall disseminate this information to the public through measures that include but shall not be limited to a posting on the agency's web site, and posting a flyer in public transit vehicles.

Senior Citizens of Sweet Home Inc. currently posts the Title VI policy information on their web site as well as signage posted on all buses and on transit bus schedules.

Title VI Complaint Procedures. (See appendix #2, Complaint Procedure and Form) In order to comply with 49 CFR Section 21.9(b), recipients must develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public upon request.

If a Senior Citizens of Sweet Home, Inc. customer feels that his/her accommodation request and /or access to public transportation was denied, he/she may file a complaint through the following options:

- Submit a customer complaint form with contact information
- Phone the transit office at 541-367-4775
- E-Mail the transit office at Dawn.shsenior@comcast.net.
- Come in to the transit office located at 880 18th Ave, Sweet Home, Or 97386
- Mail written complaint to P.O. Box 803, Sweet Home, Or 97386

Or contact: FTA Office of Civil Rights
1200 New Jersey Avenue SE
Washington, DC 20590
TTY = 1-800-877-8339, Voice = 1-866-377-8642, VCO = 1-877-877-6280

Investigation of Complaints and Appeal Process

1. Senior Citizens of Sweet Home, Inc. provides for their dispatchers to take complaints and forward them to the Title VI Complaint Coordinator (Administrative Assistant) who categorizes, tracks, develops responses forwards them to the Senior Citizens of Sweet Home, Inc. Management for approval.
2. The Supervisor or Transit Manager will investigate the complaint and make a determination. Formal investigation of the complaint will be confidential and will include, but is not limited to, details of the specific incident, frequency and dates of occurrences and names of any witnesses. Customer will be notified of resolution.
3. If the complainant is not satisfied with the resolution, an appeal request for review of a determination of unlawful denial of access or accommodation to public transportation must be filed, in writing, within 60 calendar days of the incident. The written appeal must include the customer's name, address and telephone contact number. A statement of reason(s) why the applicant believes the denial of accommodation request or access to public transportation was inappropriate is recommended.

4. The Board of Directors will set a mutually agreed-upon time and place for the review process with the applicant and/or representatives within 30 days of the request. The applicant may submit documents of their information to be included with the record and considered in the review process. A record of the review will be kept, as determined by the Board of Directors. Anyone needing special accommodations may contact the Board office at 541-367-4775 for assistance.

The right of the appellant to a prompt and equitable resolution of the complaint must not be impaired by the appellant's pursuit of other remedies, such as filing of a complaint with the Department of Justice or other appropriate federal agency or the filing of a suit in state or federal court. Use of this procedure is not a prerequisite to the pursuit of other remedies.

The Senior Citizens of Sweet Home, Inc. posts the Complaint Procedure and forms on the agency website, and the material is available in the Senior Center. Senior Citizens of Sweet Home, Inc. trains dispatchers to take complaints and forward them to the Title VI Complaint Coordinator (Administrative Assistant) who categorizes, tracks, develops responses to complaints. The Title VI Complaint Coordinator forwards complaints and responses to the Senior Citizens of Sweet Home, Inc. Manager for approval.

The Title VI complaint procedure is described in a clear format in a letter accompanying the Title VI Complaint Form. The procedure explains specific issues covered by Title VI, the process to file a formal complaint, communication process and timeline, FTA contact information, tracking procedures, and access in non-English language formats. Please see below and Appendix 2.

Disposition of Complaints

Sustained Complaints – If the complaint is substantiated, this policy and procedure prohibiting discrimination will be reviewed with the offender. Appropriate disciplinary action and/or training will be taken pursuant to the agency disciplinary procedures.

Unstained Complaints – If there is sufficient evidence to either prove or disprove the allegation(s), both parties to be compliant will be informed of the reason(s) for this disposition.

Unfounded Complaints – If it is determined that an act reported pursuant to this policy/procedure did not in fact occur, a finding of unfounded shall be made.

As of March 14, 2019, we have had no civil rights complaints during the last 3 years.

Record Title VI investigations, complaints and lawsuits. In order to comply with 49 CFR Section 21.9(b), recipients shall prepare and maintain a list of any active investigations conducted by entities other than the FTA, lawsuits, or complaints naming the recipient that

allege discrimination on the basis of race, color or national origin. This list shall include the date of the investigation, lawsuit, or complaint that was filed; a summary of the allegations(s); the status of the investigation, lawsuit, or complaint.

The Senior Citizens of Sweet Home, Inc. collects the date, complainant name or names, address and phone number, an allegation summary and other appropriate contact information. The Senior Citizens of Sweet Home, Inc. Complaint Coordinator (administrative Assistant) maintains these files and the Public Transportation Manager oversees documentation.

Public Participation Plan. Senior Citizens of Sweet Home, Inc.'s public participation strategy offers, early and continuous opportunities for the public to be involved in the identification of social, economic, and environmental impacts of proposed transportation decisions. Transportation decisions include and are not limited to transportation development and Coordinated Plans, service design changes, new services, fare changes, and changes of service policy that may limit access to service. Senior Citizens of Sweet home, Inc. will seek out and consider the viewpoints of minority, low-income, and limited English proficiency populations in the course of conducting public outreach and involvement activities. Senior Citizens of Sweet Home, Inc. will comply with grant-related public involvement requirements as defined by grant application documents.

Senior Citizens of Sweet Home, Inc.'s public involvement will be proactive in providing information, timely public notice, full public access to key decisions, and opportunities for early and continuing participation.

This may involve:

1. Identification of social, economic, and environmental impacts of Senior Citizens of Sweet Home, Inc.'s proposed transportation changes.
2. Self-identify Board of Directors' social, economic, and demographic descriptions. This optional information is used to acknowledge the directors' unique perspectives and assess public and customer representation. See Appendix 3 for Board of Directors information.
3. Timely information about transportation issues and processes to Senior Citizens of Sweet Home, Inc.'s interested parties and segments of the community who would be affected by transportation plans, programs and projects.
4. Adequate public notice of public involvement activities and time for public review and comment at key decision points.
5. Seek out and consider the needs of those who may be underserved by existing transportation systems, including persons with low-income, minority populations and those with limited English proficiency.

6. Contact agencies and individuals who are, or who represent, minorities, people with limited incomes, and people with limited English proficiency, as appropriate to participate in Senior Citizens of Sweet Home, Inc.'s transportation program.
7. A process for demonstrating explicit consideration and response to public input during the planning and program development process.
8. Periodic review of the effectiveness of the public involvement process to ensure that the process provides full and open access to all.

Required to provide meaningful access to Limited English Proficient persons. Title VI and its implementing regulations require that FTA recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient. For LEP census data see Appendix LEP.

Senior Citizens of Sweet Home Inc.'s web site, transit bus schedules and brochures all have their English written material available in Spanish. Each driver and dispatcher carries a small book from the Colorado DOT titled "Basic Spanish for Transit Employees" to help intercultural communication. Staff refers to this resource as needed. The Senior Citizens of Sweet Home Inc. conducts public outreach to ensure our less English-proficient customers have access to services and information in Spanish. If there are other language groups identified then the Senior Citizens of Sweet Home, Inc. will respond by providing instructions on how to use the public transit system in their language with Board of Directors approval. The Senior Citizens of Sweet Home, Inc. will assess customer language needs each time this Title VI Plan is updated. Vital documents will be translated for any language in which 1000 people in the service area or 5% of the service area population, whichever is less, speak English "less than very well".

Required to provide additional information upon request. At the discretion of the FTA, information other than that required by the referenced circular may be requested, in writing, from a recipient in order to investigate complaints of discrimination or to resolve concerns about possible noncompliance with Title VI requirements. The Senior Citizens of Sweet Home, Inc. Title VI Complaint Coordinator (Administrative Assistant) is available to provide additional information as needed and to respond to any inquiry.

Responsibilities. All employees of Senior Citizens of Sweet Home, Inc. shall follow the intent of these guidelines in a manner that reflects agency policy. Supervisors and managers receiving information regarding violation(s) of this order shall determine if there is any basis for action. Each Supervisor and Manager shall:

- A. Ensure that there are no barriers to service or accommodation that would prevent public transit usage or access.
- B. Train subordinates as to what constitutes discrimination and barriers to access.
- C. Take prompt and appropriate action to avoid and minimize the incidence of any form of discrimination.
- D. Notify the Transit Manager in writing of the circumstances surrounding any reported allegations of discrimination no later than the next business day.

This Title VI Plan has been approved and adopted by the Senior Citizens of Sweet Home, Inc. management team and Board of Directors, as certified by the representatives below.

Public Transportation Executive Director:

Ken Brouson
 Sign Name

1-11-2021
 Date

Ken Brouson
 Print Name

Board of Directors Chair:

Munya K Scherer
 Sign Name

1-11-2021
 Date

Munya K Scherer
 Print Name

Appendix 1. Title VI Notice



Linn Shuttle

Serving Linn County, Oregon

and Sweet Home Senior Center

Senior Citizens of Sweet Home, Inc.

Linn Shuttle and Dial-a-Bus

TITLE VI NON-DISCRIMINATION STATEMENT

The Senior Citizens of Sweet Home, Inc., with its partners, operates programs and services without regard to race, color, or national origin. In accordance with Title VI of the 1964 Civil Rights Act, 49 CFR Part 21, and all related statutes and regulations, no person shall be excluded from participation in, be denied the benefits of, nor be subjected to discrimination under any program or activity receiving federal financial assistance from the U.S. Department of Transportation.

Any person who believes they have been discriminated against should contact:

Senior Citizens of Sweet Home, Inc.

880 18th Avenue

Sweet Home, Oregon 97386

Phone: 541-367-4775

Dawn.shsenior@comcast.net

www.linnshuttle.com

Appendix 2 Title VI Complaint Procedure and Form

Title VI Complaint Procedure and Form
Senior Citizens of Sweet Home, Inc.
Adopted July 2015

Any person may file a Title VI complaint against the Senior Citizens of Sweet Home, Inc. by completing and submitting the agency's Title VI Complaint Form. Senior Citizens of Sweet Home, Inc. investigates complaints received no more than 180 days after the alleged incident. The Senior Citizens of Sweet Home, Inc. will process complete complaints and assist customers in providing complete and clear information.

The Senior Citizens of Sweet Home, Inc. investigators will review any complaint to determine jurisdiction and authority, and ensure complaints are forwarded to the appropriate organization as applicable. The Senior Citizens of Sweet Home, Inc. will provide an acknowledgement letter to the complainant informing them which organization will investigate the complaint.

The Senior Citizens of Sweet Home, Inc. has 30 days to investigate the complaint. The Senior Citizens of Sweet Home, Inc.'s investigators may contact the complainant for more information. The complainant has 15 business days from an information request to send requested information to the investigator. The Senior Citizens of Sweet Home, Inc. may close the case if there is not sufficient information to proceed. The complainant may also close the case by request.

Investigators will issue a decision letter to the complainant. A "closure letter" summarizes the allegations and states that there was not a Title VI violation; the letter signals the case is closed. A letter of finding (LOF) summarizes the allegations and explains what actions the Senior Citizens of Sweet Home, Inc. will take to resolve the issue. The complainant has 60 days after the response date to appeal the decision. The Senior Citizens of Sweet Home, Inc. or the complainant may request a meeting to discuss the resulting actions and provide further information. The finding is closed once the Senior Citizens of Sweet Home, Inc. has implemented the recommendations and the appeal period has closed.

If you have any questions or to file a Title VI complaint, please contact the Senior Citizens of Sweet Home, Inc.

Senior Citizens of Sweet Home, Inc.
880 18th Avenue
Sweet Home, Oregon 97386
Phone: 541-367-4775
Dawn.shsenior@comcast.net
www.linnshuttle.com

Customers may file a Title VI complaint directly with the Federal Transit Administration in writing or by phone.

FTA Office of Civil Rights
1200 New Jersey Avenue SE
Washington, DC 20590
1-800-877-8339
www.fta.dot.gov

TITLE VI COMPLAINT FORM Senior Citizens of Sweet Home, Inc.

Section I			
Name:			
Address:			
Telephone (Home):		Telephone (Work):	
E-Mail Address:			
Accessible Format Requirements?	Large Print		Audio Tape
	TTY		Other
Section II			
Are you filing this complaint on your own behalf?		Yes*	No
*If you answered "yes" to this question, go to Section III.			
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.		Yes	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			
Date of Alleged Discrimination (Month, Day, Year): _____			
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all person(s) who were involved, including the name and contact information of the person(s) who discriminated against you (if known). List name(s) and contact information of any witnesses. If more space is needed, please use the back of this form.			
Section IV			
Have you previously filed a Title VI complaint with this agency?		Yes	No
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 and enter name of agency or court:			

Appendix 3 Board of Directors Representation

Senior Citizens of Sweet Home, Inc. Board of Directors and Public Meetings

Updated March 2019

The Senior Citizens of Sweet Home, Inc. membership meeting is held the second Monday of March, June, September & December at 10:00 am, at the Senior Center east dining room. All are welcome to attend. The Executive Board meets the second Friday of each month at 9:45 am.

The Board of Directors includes the following people. The Directors self-identify their demographic information to assess and support the Title VI Program (see Title VI Plan, Public Involvement Plan section for more information). All members are eligible to serve on the Board of Directors and are encouraged to apply when an opening is available. Openings are posted on the bulletin board in the hall leading to the dining area. Minority members are invited to attend board meetings and run for board officer and Director positions. We encourage people from all backgrounds and origins to be a part of guiding our future and to serve the needs of the Senior Citizens of Sweet Home, Inc.

Table 1. Senior Citizens of Sweet Home, Inc. Board of Directors and Self-Identified Demographic Information

Director Name	Board Position	Sex/Gender	Race and Ethnicity
Ken Bronson	Executive Director of Finance	M	W
Dawn Mitchell	Executive Director of Operations	F	W
David Journey	President	M	W
Murya Scherer	Vice President	F	W
Pam Barbee	Secretary	F	W
Sally Pelham	Treasurer	F	W
Pat Tungett	Parliamentarian	F	W
Danny Bidwell	Director	M	W
Ruben Rivas	Director	M	H
Tonni Hutchinson	Director	F	W
Shirley Schumacher	Director	F	W
Jean Holcomb	Director	F	W
John Ashbury	Director	M	W

* Did not provide information.

LANGUAGE SPOKEN AT HOME

Appendix LEP

TABLE ID: S1601
 SURVEY/PROGRAM: American Community Survey
 PRODUCT: ACS 5-Year Estimates Subject Tables

Note: The table shown may have been modified by user selections. Some information may be missing.

		Linn County, Oregon		Percent		Percent of specified language speakers		Percent speak English only or speak English "very well"		Percent speak English less than "very well"		
		Total		Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	
Label	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population 5 years and over	117,557	±69	(X)	(X)	114,685	±546	97.6%	±0.4	2,872	±519	2.4%	±0.4
Speak only English	108,308	±772	92.1%	±0.6	(X)	(X)	(X)	(X)	(X)	(X)	(X)	(X)
Speak a language other than English	9,249	±763	7.9%	±0.6	6,377	±725	68.9%	±5.1	2,872	±519	31.1%	±5.1
SPEAK A LANGUAGE OTHER THAN ENGLISH:												
Spanish	7,333	±740	6.2%	±0.6	4,930	±693	67.2%	±5.9	2,403	±464	32.8%	±5.9
5 to 17 years old	2,060	±413	1.8%	±0.4	1,664	±384	80.8%	±9.1	396	±195	19.2%	±9.1
18 to 64 years old	4,775	±445	4.1%	±0.4	2,976	±492	62.3%	±7.8	1,799	±385	37.7%	±7.8
65 years old and over	498	±131	0.4%	±0.1	290	±139	58.2%	±21.2	208	±110	41.8%	±21.2
Other Indo-European languages	891	±245	0.8%	±0.2	773	±219	86.8%	±7.5	118	±78	13.2%	±7.5
5 to 17 years old	97	±61	0.1%	±0.1	75	±54	77.3%	±31.5	22	±34	22.7%	±31.5
18 to 64 years old	609	±197	0.5%	±0.2	542	±190	89.0%	±9.0	67	±57	11.0%	±9.0
65 years old and over	185	±79	0.2%	±0.1	156	±69	84.3%	±12.9	29	±29	15.7%	±12.9
Asian and Pacific Island languages	825	±187	0.7%	±0.2	495	±149	60.0%	±12.0	330	±122	40.0%	±12.0
5 to 17 years old	78	±60	0.1%	±0.1	58	±54	74.4%	±31.3	20	±26	25.6%	±31.3
18 to 64 years old	551	±138	0.5%	±0.1	360	±109	65.3%	±14.1	191	±96	34.7%	±14.1
65 years old and over	196	±71	0.2%	±0.1	77	±43	39.3%	±16.8	119	±53	60.7%	±16.8
Other languages	200	±145	0.2%	±0.1	179	±136	89.5%	±12.3	21	±25	10.5%	±12.3
5 to 17 years old	11	±18	0.0%	±0.1	0	±29	0.0%	±92.8	11	±18	100.0%	±92.8
18 to 64 years old	177	±137	0.2%	±0.1	167	±133	94.4%	±10.5	10	±17	5.6%	±10.5
65 years old and over	12	±18	0.0%	±0.1	12	±18	100.0%	±88.8	0	±29	0.0%	±88.8
CITIZENS 18 YEARS AND OVER												
All citizens 18 years old and over	93,445	±386	(X)	(X)	92,594	±480	99.1%	±0.3	851	±265	0.9%	±0.3
Speak only English	89,252	±513	95.5%	±0.4	(X)	(X)	(X)	(X)	(X)	(X)	(X)	(X)
Speak a language other than English	4,193	±420	4.5%	±0.4	3,342	±384	79.7%	±5.7	851	±265	20.3%	±5.7
Spanish	2,963	±404	3.2%	±0.4	2,361	±356	79.7%	±6.8	602	±229	20.3%	±6.8
Other languages	1,230	±227	1.3%	±0.2	981	±215	79.8%	±7.4	249	±98	20.2%	±7.4

Limited English Proficiency Plan and Four Factor Analysis

****A Limited English Proficiency Plan (LEP) is a document which explicitly describes the proactive strategies, procedures, and desired outcomes to ensure meaningful access to benefits, services, information, and other important portions of programs and activities for individuals who are limited-English proficient (LEP).***

Senior Citizens of Sweet Home, Inc. has developed the following Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to **Senior Citizens of Sweet Home, Inc.** services as required by Executive Order 13166. A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training to staff, notification to LEP persons that assistance is available, and information for future plan updates. In developing the plan while determining the **Senior Citizens of Sweet Home, Inc.**'s extent of obligation to provide LEP services, the **Senior Citizens of Sweet Home, Inc.** undertook a U.S. Department of Transportation four-factor LEP analysis which considers the following:

- 1) The number or proportion of LEP persons eligible in the **Senior Citizens of Sweet Home, Inc.** service area who may be served or likely to encounter by **Senior Citizens of Sweet Home, Inc.** program, activities, or services;

See Appendix LEP

- 2) The frequency with which LEP individuals come in contact with an **Senior Citizens of Sweet Home, Inc.** services;

Senior Citizens of Sweet Home, Inc.'s staff reviewed the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP persons for **2020**. **Senior Citizens of Sweet Home, Inc.** averages **2** contacts per **Month**.

- 3) The nature and importance of the program, activities or services provided by the **Senior Citizens of Sweet Home, Inc.** to the LEP population:
 - a) Identification of social, economic, and environmental impacts of Senior Citizens of Sweet Home, Inc.'s proposed transportation changes.
 - b) Self-identify Board of Directors' social, economic, and demographic descriptions. This optional information is used to acknowledge the directors' unique perspectives and

assess public and customer representation. See Appendix 3 for Board of Directors information.

- c) Timely information about transportation issues and processes to Senior Citizens of Sweet Home, Inc.'s interested parties and segments of the community who would be affected by transportation plans, programs and projects.
 - d) Adequate public notice of public involvement activities and time for public review and comment at key decision points.
 - e) Seek out and consider the needs of those who may be underserved by existing transportation systems, including persons with low-income, minority populations and those with limited English proficiency.
 - f) Contact agencies and individuals who are, or who represent, minorities, people with limited incomes, and people with limited English proficiency, as appropriate to participate in Senior Citizens of Sweet Home, Inc.'s transportation program.
 - g) A process for demonstrating explicit consideration and response to public input during the planning and program development process.
 - h) Periodic review of the effectiveness of the public involvement process to ensure that the process provides full and open access to all.
- 4) The resources available to **Senior Citizens of Sweet Home, Inc.** and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

Senior Citizens of Sweet Home, Inc. provides a statement in Spanish and will for additional languages specific to the LEP community make up that will be included in all public outreach notices. Every effort will be made to provide vital information to LEP individuals in the language requested.

Safe Harbor Provision for written translations

Senior Citizens of Sweet Home, Inc. complies with the Safe Harbor Provision, as evidenced by the number of documents available in the Spanish language. With respect to Title VI information, the following shall be made available in Spanish:

- (1) Non Discrimination Notice
- (2) Discrimination Complaint Procedures
- (3) Discrimination Complaint Form