

Title VI Program

Introduction

In Accordance with Title VI of the Civil Rights Act of 1964, this program reflects our commitment to ensuring that no person shall, on the ground of race, color, national origin, religion, age, marital status, sexual orientation, or disability be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity provided by the Lebanon Dial-a-Bus.

Title VI Notice to the Public

The City of Lebanon Dial-a-Bus Title VI Notice to the Public shall be posted at the following locations. A copy of the public notice can be found as **Attachment C**:

Lebanon Senior Center – Dial-a-Bus Office
Lebanon City Hall
On board buses operated by Lebanon Dial-a-Bus

Title VI Complaint Procedures

The Lebanon Dial-a-Bus has a standard process for investigating all complaints. Members of the public may file a signed, written complaint up to one hundred eighty (180) days from the date of alleged discrimination. Full procedures for filing a complaint and Lebanon Dial-a-Bus's procedures for investigating complaints can be obtained at the Lebanon Senior Center/Dial-a-Bus Office or on the website, at www.ci.lebanon.or.us. They are also in this document, as **Attachment A**. At a minimum, the complaint shall include the following information:

- Name, mailing address, and how to contact complainant (i.e., telephone number, e-mail address, etc.)
- How, when, where, and why complainant alleges she/he was discriminated against. Include the location and names and contact information of any witnesses.
- Other significant information.

The complaint may be filed in writing and sent to the following address:

Lebanon Dial-a-Bus
80 Tangent Street
Lebanon, OR 97355
by Phone: 541-258-4222
By Facsimile: 541-258-4956

A Title VI Complaint Form can be found as **Attachment B**.

Record of Title VI investigations, Complaints, or Lawsuits

The City of Lebanon Dial-a-Bus will maintain a list of any and all transit related Title VI investigations, complaints, and lawsuits. The list shall be kept and maintained at the Administrative Office of the Lebanon Dial-a-Bus, located at 80 Tangent Street, Lebanon, Oregon 97355. No civil rights related investigations, lawsuits or complaints as of the date of the approval of this plan.

Minority Representation on Non-elected Bodies

At this time the Lebanon Dial-a-Bus does not have any non-elected bodies, committees, or councils of which it must report racial membership rates. If the Transportation Program develops any non-elected bodies the City will encourage the participation of minorities in proportion to the minority makeup of the service area. Also the City will maintain a table documenting the racial makeup of membership of such committees.

Title VI Public Participation Plan

The Lebanon Dial-a-Bus shall strive to include minority and LEP (Limited English Proficiency) individuals in its decision making processes. This includes outreach to minority groups in the Lebanon area.

Summary of Ongoing Public Participation Efforts and Outreach

Lebanon Dial-a-Bus has taken the following steps for public outreach and involvement activities:

Meetings

In accordance with Oregon public meeting law, all public meetings including transportation are open to the general public. Accommodations are available for those with limited English proficiency if requested in advance of a transportation meeting.

Brochure

The current brochure includes a note in Spanish for a contact number in order to obtain information.

Staff

The Lebanon Dial-a-Bus drivers and dispatcher have a small book from the Colorado DOT, "Basic Spanish for Transit Employees." They refer to this resource, as needed, to assist individuals (in person and over the phone), at least at a basic level until we determine if we need to call in an interpreter.

Bilingual Outreach

The City maintains a list of Spanish-speaking employees, and can contract for Spanish interpreters if necessary.

Lebanon Dial-a-Bus Limited English Proficiency

Lebanon Dial-a-Bus is required to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of our programs and activities of

individuals who are Limited English Proficient (LEP). Lebanon Dial-a-Bus consulted the USDOT's LEP Guidance and performed a four factor analysis of our contact with the public to determine the appropriate mix of LEP services to offer.

Four Factor Analysis:

Factor 1: The number or proportion of LEP persons in the service area.

Step 1: Prior experience with LEP individuals. Over the past year, our dispatchers and drivers have not encountered any individuals that required an interpreter.

Step 2: Data was gathered from the following sources to identify information on persons who speak languages other than English at home and those who speak English less than well or not at all and would be classified as Limited English Proficient or "LEP":

- a. 2010 Census Data
- b. Census Bureau's American Community Survey and Fact Finder Surveys
- c. Department of Labor LEP Special Tabulation website Mid-Willamette Workforce

Step 3: According to the Census Bureau's American Community Survey and Fact Finder "Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over, B16001" Report, only 219 (with a +/- 169 margin of error) individuals speak English "less than very well."

According to the Mid-Willamette Workforce Network the number of Spanish speaking LEP individuals that spoke English "not well" or "not at all" in the mid-Willamette area is 4.6%, which translates to approximately 710 residents in Lebanon.

Factor 2: The frequency with which LEP individuals come into contact with the service.

Lebanon Dial-a-Bus drivers and dispatcher haven't encountered anyone with a LEP in the past year. We haven't had anyone request assistance with a language barrier or that required an interpreter.

Factor 3: The importance of the service to LEP persons.

Lebanon Dial-a-Bus provides important transportation services to the public through its demand response curb-to-curb service. Lebanon Dial-a-Bus is the only major public transportation provider that provides Lebanon-to-Lebanon, curb-to-curb service to healthcare facilities, shopping, social and recreational opportunities, educational campuses, and social service offices. Language barriers would most affect users of our service when calling to make an appointment for the bus, as that is how 98% of our riders use our system. The other 2% will walk on at locations our buses are picking up or dropping off other riders.

Factor 4: The resources available to the recipient of the federal funds to assure meaningful access to the service by LEP persons

Lebanon Dial-a-Bus currently provides contact information in Spanish on through the Dial-a-Bus brochure, on the website and our drivers are equipped with aids to communicate with LEP riders. The Lebanon Dial-a-Bus maintains a list of employees who are fluent in Spanish and other languages, and professional translation services are available if required.

Processes for providing language assistance services by language

Based on the four factor analysis, the Lebanon Dial-a-Bus recognizes there are some LEP individuals in the community we serve.

Providing notice to LEP's of language assistance

Notice will be placed on the buses, transportation website and brochures announcing the availability of Language assistance, as needed.

Monitoring, evaluating and updating LEP

Lebanon Dial-a-Bus staff will contact the community organizations that serve LEP persons, as well LEP persons themselves, and also perform a four factor analysis every three years to identify what, if any, additional information or activities might better improve transportation services to assure non-discriminatory service to LEP persons. Lebanon Dial-a-Bus will then evaluate the projected changes needed to provide the requested services and assess which of these can be provided cost-effectively.

Training Employees

Lebanon Dial-a-Bus will train all employees, staff and volunteers to proficiency regarding the need and availability of language assistance to LEP individuals who use the service. Employees will be encouraged to use the services provided when contact with LEP individuals prevents or hinders communication. This training will be provided at least annually.

Title VI equity analysis

There are no current planned facilities or construction projects that require a Title VI equity analysis.

Attachment A

Discrimination 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 Lebanon Dial-a-Bus. A complaint may also be filed by a representative on behalf of such a person. All complaints will be referred to the Transportation Superintendent 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, Lebanon Dial-a-Bus may extend the time for filing or waive the time limit in the interest of justice, as long as Lebanon Dial-a-Bus 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. 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 an officer or employee of the Lebanon Dial-a-Bus, the person shall be interviewed by the Transportation Director. If necessary, the Transportation Director will assist the person in reducing the complaint to writing and submit the written version of the complaint to the person for signature. The complaint shall then be handled according to Lebanon Dial-a-Bus's investigative procedures.
4. Within 10 days, the Transportation Director will acknowledge receipt of the allegation, inform the complainant of action taken or proposed action to process the allegation, and advise the complainant of other avenues of redress available, such as the Oregon Department of Transportation (ODOT) and U.S. Department of Transportation (USDOT).
5. The Transportation Director will advise ODOT and/or USDOT within 10 days of receipt of the allegations. Generally, the following information will be included in every notification to ODOT and/or USDOT:
 - a) Name, address, and phone number of the complainant.
 - b) Name(s) and address (es) of alleged discriminating official(s).
 - c) Basis of complaint (i.e., race, color, national origin, or sex)
 - d) Date of alleged discriminatory act(s).

- e) Date complaint received by the recipient.
 - f) A statement of the complaint.
 - g) Other agencies (local, state, or Federal) where the complaint has been filed.
 - h) An explanation of the actions Lebanon Dial-a-Bus has taken or proposed to resolve the issue in the complaint.
6. Within 60 days, the Transportation Director will conduct an investigation of the allegation and based on the information obtained, will render a recommendation for action in a report of findings to the Lebanon City Manager. The complaint should be resolved by informal means whenever possible. Such informal attempts and their results will be summarized in the report of findings.
7. Within 90 days of receipt of the complaint, the Transportation Director will notify the complainant in writing of the final decision reached, including the proposed disposition of the matter. The notification will advise the complainant of his/her appeal rights with ODOT, or USDOT, if they are dissatisfied with the final decision rendered by the Lebanon Dial-a-Bus. The Transportation Director will also provide ODOT and/or USDOT with a copy of this decision and summary of findings upon completion of the investigation.
8. Contact information for the state and federal Title VI administrative jurisdiction is as follows:

ODOT Public Transit Division
555 13th Street NE
Salem, OR 97301
503-986-4305
503-986-4189 fax

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

Have you filed this complaint with any other federal, state or local agency or with any court? Yes No

If yes, check and identify all that apply:

- Federal Agency _____
- Federal Court _____
- State Agency _____
- State Court _____
- Local Agency _____

Please provide information for a contact person at the Agency or Court where the complaint was filed.

Name: _____

Address: _____

City, State, & Zip Code: _____

Telephone Number: _____

Please sign below. You may attach any additional written materials or other information you believe is relevant to your complaint.

Signature

Date

Please mail this form to:

Title VI Coordinator
City of Lebanon Dial-a-Bus
80 Tangent Street
Lebanon, OR 97355

Attachment C

Notice to the Public

Notifying the Public of Rights under Title VI

- The City of Lebanon Dial-a-Bus 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 believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the City of Lebanon Dial-a-Bus.
- For more information on the City of Lebanon Dial-a-Bus' Civil Rights Program and procedures to file a complaint, contact 541-258-4222; email koliver@ci.lebanon.or.us; visit www.ci.lebanon.or.us ; or come to our office at the Lebanon Senior Center, 80 Tangent Street, Lebanon, OR 97355.
- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5 Floor TCR, 1200 New Hersey Avenue SE, Washington, DC 20590.
- If information is needed in another language, contact 541-258-4222.
Si se necesita informacion en otro idioma de contact 541-258-4222.