



Tillamook County Transportation District

Title VI Program

Effective: August 24, 2018

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The TCTD Title VI plan is available in Spanish by going to the Tillamook County Transportation District website at www.tillamookbus.com

Introduction

Tillamook County Transportation District (TCTD) was established by the Tillamook County Board of Commissioners in July 1997 as a special district as defined by ORS 267.500. The District is governed by a 7-member board of directors who are elected at large. The Board meets monthly with the general manager to approve policy, the execution of contracts, and adoption of the annual budget. The general manager oversees the District's administrative and operations functions and oversees and manages a staff of more than 50 employees and volunteers.

TCTD is a regional transportation provider. The District operates and maintains a fleet of 28 vehicles to serve both local and regional public transportation needs. The District currently provides dial-a-ride service throughout Tillamook County and provides non-emergency medical transportation trips to and from the Portland, Salem, Seaside-Astoria, Lincoln City-Newport and Corvallis. TCTD also operates deviated fixed route services between Tillamook and Cannon Beach, Tillamook and Oceanside, and between Tillamook to Lincoln City. The District also provides intercity bus services between Tillamook and Portland and between Lincoln City and Salem. Finally, the District operates a commuter bus service called the Grand Ronde Express which operates between Salem and Grand Ronde.

Mission and Vision Statement

TCTD is a mission and values-based organization. Our vision is being, "Committed to providing innovative transportation services" while our mission is "Connecting the community through sustainable transit services". TCTD's guiding values are accountability, innovation, safety, communication and service excellence.

Policy Statement

This program reflects Tillamook County Transportation District's 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 Tillamook County Transportation District ("TCTD").

Signed Policy Statement

A policy statement signed by the General Manager assuring TCTD's compliance with Title VI of the Civil Rights Act of 1964 can be found as **Attachment A**.

Title VI Complaint Procedures

TCTD has a standard process for investigating all complaints. Members of the public may file a signed, written complaint up to one hundred and eighty (180) days from the date of alleged discrimination. Full procedures for filing a complaint and TCTD's procedures for investigating complaints can be found as **Attachment B**. At a minimum, the complaint should include the following information:

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

The complaint may be filed in writing with TCTD at the following address:

Doug Pilant
General Manager
Tillamook County Transportation District
3600 3rd Street, Suite A
Tillamook, Oregon 97141
Email address: dpilant@tillamookbus.com
By Phone: (503) 842-3115
By Facsimile: (503) 815-2834

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

Record of Title VI investigations, complaints, or lawsuits

Over the reporting period, TCTD had no Title VI complaints, investigations or lawsuits filed against it. For a copy of a report, go to the TCTD website at www.tillamookbus.com

TCTD's LEP Outreach Plan

A full copy of the outreach plan for individuals with limited English proficiency can be found in **Attachment F**. Key elements of the plan include:

- Spanish speaking translators available upon request during normal business hours.
- Route and schedule brochures are currently provided in English and Spanish. The schedule is published and available on the website in both English and Spanish.
- Route and schedule information available in Spanish on the TCTD website.
- The entire TCTD website is available in both English and Spanish.

Notification of TCTD's Title VI obligations

TCTD publicizes its Title VI program by posting its commitment to providing services without regard to race, color or national origin in all buses, schedules, on the TCTD website, and in the main transit office. The signs, website and route schedules all include the following statements:

- Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance (42 U.S.C. Section 2000d).
- TCTD is committed to practicing non-discrimination. If you believe you have been subjected to discrimination you may file a complaint with the TCTD's Title VI Coordinator.

Summary of Public Participation Efforts

Over the last reporting period, TCTD conducted the following public outreach and involvement activities:

Spanish Program Information:

TCTD website is available in both English and Spanish languages at www.tillamookbus.com

Spanish Service Schedules:

The current service schedule is available in English and Spanish and made available via paper brochures and on the TCTD website.

Bilingual Outreach:

The County maintains a list of fluent Spanish-speaking employees and can contract for Spanish interpreters if necessary. We also work with Centro De Ayuda, who is available to assist with translation and other services. Language Line Services have been contacted and their services may be utilized as necessary.

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

Title VI Outreach Effort:

TCTD conducted an outreach to the Title VI community as part of the development of the TCTD Long Range Transit Development Plan (LRTDP). This outreach included reaching out to all Title VI communities to conduct one-on-one interviews. These interviews were followed by inviting members of these communities to participate in local workshops in Tillamook, Pacific City and Nehalem. Many of the LRTDP unmet needs were identified this outreach effort.

Planning and Development:

In 2015 the District conducted a planning process to establish an Intercity Service Enhancement Plan. TCTD outreach included meetings with both the Confederated Tribes of Siletz Indians and the Confederated Tribes of Grand Ronde.

TCTD's General manager is a member of the Confederated Tribes of Grand Ronde's Transportation Development Planning Advisory Committee. This Committee oversees the development of the CTGR Transit Development Plan.

TCTD is a member of the NW Oregon Transit Alliance (NWOTA). The NWOTA charter members are Sunset Empire Transportation District, Tillamook County Transportation District, Lincoln County District, Benton County Rural Services and Columbia County Rider. The leaders of each agency meet monthly to collaborate so that each agency's collective transit services can be marketed and branded as a 5-county regional bus system called the NW Connector. The Alliance also shares the expense to maintain a single website where bus riders can plan trips throughout the region. See www.nworegontransit.org to become familiar with how our region partners with each other.

Public Participation Plan

Purpose

The purpose of this Public Participation Plan (PPP) is to establish procedures that allow for, encourage and monitor participation of all citizens in the TCTD area, including but not limited to low income, minority individuals and those with limited English proficiency. While traditional means of soliciting public involvement may not reach such individuals, or might not allow for meaningful avenues of input, the intent of this effort is to take reasonable actions throughout the planning process to provide opportunities for historically underserved populations to participate.

Goals and Objectives for the Public Participation Plan

Goal: The goal of the PPP is to offer real opportunities for the engagement of all citizens of the TCTD boundaries to participate.

Objectives:

- To determine what cultural barriers, exist to public participation within the TCTD boundaries.
- To provide notifications of meetings, particularly forums for public input, in a manner that is understandable to all populations in the area.

- To hold meetings in locations which are accessible and reasonably welcoming to all area residents, including, but not limited to, low-income and minority members of the public.
- To provide avenues for two-way flow of information and input from populations which are not likely to attend public meetings.

Identification of stakeholders

Stakeholders are those who are either directly, or indirectly, affected by a plan, or the recommendations of that plan. Those who may be adversely affected, or who may be denied benefit of a plan's recommendation(s), are of particular interest in the identification of specific stakeholders. Stakeholders are broken down into several groups: general citizens, minority and low-income persons, public agencies and private organizations and businesses.

General Public:

Some of the techniques that can be used to engage the general population are public notices of meetings in the local newspapers, open house format public information meetings and use of local radio news media.

Minorities:

Engaging minority and Limited English Proficient populations can be challenging. Language and cultural differences may not be compatible with the more traditional means of engaging the public in the planning process. TCTD will make reasonable efforts to engage minority populations using techniques such as including notations in public notices in Spanish that will provide a contact where the individual can be informed of the process/project and will have the opportunity to give input. Advocacy groups can be a good source for contacts and dissemination of information to minority and limited English proficient populations. Such advocacy groups or agencies can have insight into the needs of the under-represented populations, as well as providing valuable contacts or arenas for input. Contacts with local translators and Centro De Ayuda should be maintained and used as requested and needed.

Low-Income:

While low-income individuals may have access to all of the traditional means of Public Involvement discussed under "General Public", they may be less likely to become involved, or offer input. Some methods of gaining input either directly or indirectly from this portion of the population include focus groups, informal interviews and agency/advocacy group contacts.

Public Agencies:

Public agencies can provide valuable input to the planning process, in addition to assisting in gaining participation from traditionally under-represented populations. Pertinent public agencies include those that have clients who fall into under-represented populations, including but not limited to minorities, low-income and limited English

proficiency households. These agencies have great insight into the transportation needs of their clients and are useful partners in overcoming difficult barriers that may not be understood by professionals dealing more distinctly with the provision of transportation services.

Private Organizations and Businesses:

Private organizations and businesses offer a number of perspectives that are valuable to the planning process. Often, transportation for employees is of critical concern to private sector employers. This is particularly true in a tourism area, such as ours, where many jobs are low-income and seasonal. Employees often cannot afford cars, insurance and maintenance so they must rely on our local transit system. For that reason, representation of private business interests will be welcome to participate in any planning process or other meetings that may be held.

Other techniques could also be determined to be useful at any particular stage of the process, and new and different techniques will be utilized as deemed appropriate.

Construction Projects Undertaken:

TCTD has undertaken construction projects during this reporting period. The construction project undertaken received a Categorical Exclusion (CE) from the Federal Transit Administration. I have reviewed Chapter IV, Section 8 of the FTA's Title VI circular and have found the following: "Recipients are not required to conduct environmental justice analysis of projects where NEPA documentation is not required." The TCTD project was the repair and renovation of an existing facility structure. There were no negative impacts on local residents or the environment. This project has since been completed. This information is being incorporated into our Title VI Program, which you will find attached.

Attachment A

TILLAMOOK COUNTY TRANSPORTATION DISTRICT

**TITLE VI NON-DISCRIMINATION
POLICY STATEMENT**

August 23, 2018

Title VI of the Civil Rights Act of 1964 states:

“No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

Tillamook County Transportation District is committed to complying with the requirements of Title VI in all of its programs and activities. Questions and complaints may be reported to Doug Pilant, General Manager, Tillamook County Transportation District at 503-842-8283; by email to dpilant@tillamookbus.com; or by mail to 3600 3rd Street, Suite A, Tillamook, Oregon 97141.



Doug Pilant, General Manager
Tillamook County Transportation District

Attachment B

Discrimination Complaint Procedure

1. Any person who believes that 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 and the Civil Rights Restoration Act of 1987, as amended, may file a complaint with the TCTD. A complaint may also be filed by a representative on behalf of such a person. All complaints will be referred to the Transit Program Director 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, TCTD may extend the time for filing or waive the time limit in the interest of justice, as long as TCTD 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 that a person makes a verbal complaint of discrimination to an officer or employee of TCTD, the person shall be interviewed by the General Manager. If necessary, General Manager 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 TCTD's investigative procedures.
4. Within 10 days, the General Manager 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 General Manager 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 of complaint received by the recipient.
 - f) A statement of the complaint.
 - g) Other agencies (state, local or Federal) where the complaint has been filed.
 - h) An explanation of the actions TCTD has taken or proposed to resolve the issue in the complaint.
6. Within 60 days, the General Manager 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 District's Board of Directors. 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 General Manager 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 TCTD. The General Manager 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
Intermodal Civil Rights Manager
3930 Fairview industrial Drive SE, MS23
Salem, OR 97302
503-986-3619
503-986-4189 fax
carroll.j.cottingham@odot.state.or.us

Attention: Title VI Program Coordinator
East Building, 5th Floor – TCR
1200 New Jersey Ave., SE
Washington, DC 20590

Attachment C

Tillamook County Transportation District Title VI Complaint Form

SECTION I

Name: _____

Address: _____ City: _____ State: _____ Zip: _____

Telephone Number: _____ Email Address: _____

Accessible Format Requirements?: Large Print TTY Audio Type Other: ____

SECTION II

Are you filing this complain on your own behalf? Yes* No

*If "yes" to this question, skip remainder of this section and go to Section III

If no, please supply the name and relationship of the person for whom you are complaining:

Name: _____ Relationship: _____

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):

Race Color 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 court?

Yes No

If yes, check all that apply and name of agency or court:

- 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: _____

Title: _____

Agency: _____

Address: _____ City: _____ State: _____ Zip: _____

Telephone Number: _____

SECTION VI

Name of Agency complaint is against: _____

Contact Person: _____

Title: _____

Telephone Number: _____

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

Signature and date required below

Signature

Date

Please mail this form to:

Title VI Coordinator
Tillamook County Transportation District
3600 3rd Street, Suite A
Tillamook, Oregon 97141

Attachment D

Tillamook County Transportation District Title VI List of Complaint, Investigations and Lawsuits

	Date (Month, Day, Year)	Summary	Status	Action Taken
Investigations				
None				
Lawsuits				
None				
Complaints				
None				

Attachment E

Tillamook County Transportation District advertises in the local media that includes newspapers, radio stations and website to seek Tillamook County residents to fill vacant board and committee positions. Below is a table of the existing minority representation.

TCTD Minority Representation

Body	White (not Hispanic origin)	Asian or Pacific Islander	Black (not Hispanic origin)	Hispanic	American Indian or Alaskan Native
Population	21,733	289	79	2,573	199
Board of Directors	100%				
STF Advisory Committee	75%	12.5%		12.5%	
STIF Advisory Committee	75%	25%			

White (not of Hispanic origin): All persons having origins in any of the original peoples of Europe, North Africa or the Middle East.

Asian or Pacific Islander: All persons having origins in any of the peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands. This area includes, for example, China, Japan, Korea, the Philippine Islands and Samoa.

Black (not of Hispanic origin): All persons having origins in any of the Black racial groups of Africa.

Hispanic: All persons of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race.

American Indian or Alaskan Native: All persons having origins in any of the original peoples of North America, and who maintain cultural identification through tribal affiliation or community recognition.

Attachment F

TILLAMOOK COUNTY TRANSPORTATION DISTRICT

LIMITED ENGLISH PROFICIENT (LEP) PLAN

July 31, 2018

TCTD 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). TCTD 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 five years, our dispatcher has taken approximately 15 phone calls from LEP persons in our area, none of which has required the use of 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":

2012 – 2016 U.S. Census Bureau American Community Survey Data

A review of the 2012-2016 American Community Survey data (<http://factfinder.census.gov>) on the numbers of limited English proficient or LEP persons revealed that in Tillamook County, Oregon the number of people over age 5 who speak a language other than English at home was 1,761 or 7.3% of the population five years of age and older. 33.5% of the Tillamook County population reports that they speak English less than "very well." The most common language other than English spoken at home was Spanish, with 1,500 people (8.0%) recorded as speaking Spanish (Source: American Community Survey, 2012-2016 American Community Survey 5-Year Estimates, Tillamook County, Oregon.)

http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml?_afpt=table

Body	White (not Hispanic origin)	Asian or Pacific Islander	Black (not Hispanic origin)	Hispanic	American Indian or Alaskan Native
Population	91.4%	1.7%	0.7%	10.1%	2.4%

Factor 2: The Frequency with which LEP Individuals Come into Contact with the Service.

TCTD serves LEP persons daily through demand response services such as dial-a-ride and deviated-fixed-route services. Over the past five years, our dispatcher has taken approximately 15 phone calls from LEP persons in our area, none of which has required the use of an interpreter.

Factor 3: The Importance of the Service to LEP Persons

TCTD provides important transit services to the public through its deviated fixed route and demand response public transit programs. TCTD is the only major public transportation provider in Tillamook County and provides a link between all incorporated cities within Tillamook County, residential areas, commercial centers, healthcare facilities, educational campuses, and social service offices. Language barriers would most affect users of the demand response system as reservations for the system are taken via telephone. The demand response portion of TCTD services provides approximately 7% of the total rides provided through TCTD.

Factor 4: The Resources Available to the Recipient of the Federal Funds to Assure Meaningful Access to the Service by LEP Persons

TCTD currently provides basic information in Spanish through bus schedules, the District's website, a reference guide entitled "Basic Spanish for Transit Employees" for bus drivers, dispatch and office staff. Tillamook County maintains a list of employees who are fluent in Spanish and other languages, and professional translation services are available if required. TCTD also currently working with Language Line Services to set up an account should we need their services.

Implementation Plan:

Based on the four-factor analysis, TCTD recognizes the need to continue providing language services. A review of TCTD relevant programs, activities and services that are being offered by the County as of July 2011 include:

- Spanish speaking translators are available upon request during normal business hours
- Route and schedule information are available in English and Spanish on the TCTD website.
- Paper schedules are available in English and Spanish and are available on the buses, the transit office and local businesses.
- We are currently working with Language Line Services to set up an account should their services be needed.

Based on the demand for alternate language services, and considering the limited budget of the TCTD, other activities and services that will be developed in the next three years include:

- Transit surveys conducted by TCTD will be available in Spanish
- Future route maps will be available in both English and Spanish
- The existing telephone system will be modified to include Language Line Services
- Local translation services will be contacted and if feasible, placed on retainer

TCTD's outreach and marketing initiatives have yielded a list of community organizations that serve populations with limited English proficiency. The following list of community organizations will be contacted to assist in gathering information and see what services are most frequently sought by the LEP population:

Tillamook County Public School District
Centro De Ayuda
Tillamook County Health and Human Services

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