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DOUGLAS COUNTY OREGON  
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Douglas County Transportation Title VI Plan Summary

Prepared on October 28, 2015

PATRICIA K. HITT, COUNTY CLERK

The purpose of this brief summary is to provide an overview of the Douglas County Transportation Title VI Plan. The Federal Government and the Oregon Department of Transportation (ODOT) require any transportation program that receives federal or state funding assistance to have an adopted Title VI Plan.

The Douglas County Transportation System will operate its programs and services without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act. Douglas County residents were provided an opportunity to comment on the Douglas County Transportation Title VI Plan during public meetings of the Special Transportation Advisory Committee. Douglas County also performed outreach to community leaders to ascertain the transportation needs of the minority population within Douglas County.

The Douglas County Transportation Title VI Plan includes the following provisions to insure that the civil rights protections afforded by Title VI are adhered to.

- Title VI public notice. *(Please see attached copy)*. To be posted inside all Douglas County public transportation vehicles, on the Douglas Rides web site and the Douglas County web site.
- Included in the Title VI public notice is information pertaining to how an individual may file a complaint should they feel that their Title VI civil rights have been violated.
- A Title VI complaint form as well as a procedure for handling Title VI complaints is available online or at the Douglas County Courthouse. *(Please see attached copies)*.
- A method for tracking Title VI complaints as well as a means for reporting the minority population demographics of Douglas County. *(Please see attached copy)*.
- Consideration for residents who may have a Limited English Proficiency (LEP). Currently, Douglas County has less than 5% of its population that *might* be in the LEP category. This low percentage of LEP residents allows Douglas County to forego creating an LEP Plan as indicated by the 4 Factor Analysis. *(Please see attached copy)*.

Douglas County is committed to providing transportation services that are in full compliance with Title VI provisions.

BOARD OF COUNTY COMMISSIONERS OF  
DOUGLAS COUNTY

By [Signature]  
Chair

By [Signature]  
Commissioner

By [Signature]  
Commissioner

Date January 13, 2016

RECEIVED

OCT 28 2015

Douglas County Counsel

## **Title VI Notice**

# **Douglas County Public Transportation**

The Douglas County Public Transportation System operates its programs and services without regard to race, color, or 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 Douglas County.

For more information on the Douglas County Public Transportation civil rights program, and the obligations and procedures to file a complaint, contact Dennis Pinheiro, telephone: 541-957-3789

Email: [depinhei@co.douglas.or.us](mailto:depinhei@co.douglas.or.us) or visit our office located at 1036 SE Douglas Avenue, Room 306, Roseburg, OR 97470.

A complainant may also file a complaint directly with the Federal Transit Administration: Office of Civil Rights, Attn: Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

## Douglas County Title VI Complaint Procedure

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the Douglas County Public Transportation System (hereinafter referred to as "Douglas County Transportation") may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. Douglas County Transportation investigates complaints received no more than 180 days after the alleged incident. Douglas County Transportation will process complaints that are complete.

Once the complaint is received, Douglas County Transportation will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

Douglas County Transportation has 45 days to investigate the complaint. If more information is needed to resolve the case, Douglas County Transportation may contact the complainant. The complainant has 10 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days, Douglas County Transportation can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur. If the complainant wishes to appeal the decision, she/he has 10 days after the date of the closure letter or LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration at: FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590  
<http://www.fta.dot.gov/contactus.html>

**DOUGLAS COUNTY TRANSPORTATION TITLE VI COMPLAINT FORM****Section I**

Name:

Address:

Telephone (Home):

Telephone (Work):

E-Mail Address:

Accessible Format  
Requirements?Large Print  
TTYAudio Tape  
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):

 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 federal or state court?

 Yes No

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

Federal Agency: \_\_\_\_\_

Federal Court \_\_\_\_\_

State Agency \_\_\_\_\_

State Court \_\_\_\_\_

Local Agency \_\_\_\_\_

Please provide information about a contact person at the agency or court where the complaint was filed.

Name:

Title:

Agency:

Address:

Telephone:

**Section VI**

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Name of agency complaint is against:

Contact person:

Title:

Telephone:

Please attach any written materials or other information that you think is relevant to your complaint.

Signature and date required below

Signature

Date

Please submit this form in person at the address below, or mail this form to:

Douglas County Transportation

Attn: Douglas County Transportation System Mobility Manager

1036 SE Douglas, Room 306

Roseburg, OR 97470

**DOUGLAS COUNTY TRANSPORTATION TITLE VI INVESTIGATIONS, COMPLAINTS & LAWSUITS:**

**Investigations, Lawsuits and Complaints**

	<b>Date (Month, Day, Year)</b>	<b>Summary (Include complaint basis: race, color, or national origin)</b>	<b>Status</b>	<b>Action(s) Taken</b>
<b>Investigations</b>				
1.				
2.				
<b>Lawsuits</b>				
1.				
2.				
<b>Complaints</b>				
1.				
2.				

**MINORITY REPRESENTATION TABLE**

<b>Body</b>	<b>Caucasian</b>	<b>Latino</b>	<b>African American</b>	<b>Asian American</b>	<b>Native American</b>
<b>Population</b>	<b>91.9%</b>	<b>4.7%</b>	<b>0.4%</b>	<b>1.1%</b>	<b>1.9%</b>
<b>Special Trans. Advisory Committee</b>	<b>77.8%</b>	<b>11.1%</b>	<b>11.1%</b>	<b>0%</b>	<b>0%</b>
<b>Citizens Advisory Council</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>
<b>Bicycle Pedestrian Committee</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>

## Limited English Proficiency (LEP)

2013 Census figures report that the population demographics of Douglas County is: 93.2% White..... 0.4% African American.....1.9% American Indian.....1.1% Asian ..... 5.1% Hispanic. Of ALL non-white Douglas County residents only 4% speak a language other than English in the home. As the Census figures indicate, Douglas County has very few LEP residents and has chosen to exercise the option to not develop a written LEP Plan at this time. Please see the quoted excerpt from the DOT LEP Guidance Handbook below. The decision to not develop a written LEP Plan is also based on a 4 Factor Analysis.

“The DOT LEP Guidance, as well as FTA Circular 4702.1A, state that certain FTA recipients or sub-recipients, such as those serving very few LEP persons or those with very limited resources may choose not to develop a written LEP plan. However, the absence of a written LEP plan does not obviate the underlying obligation to ensure meaningful access by LEP persons to a recipient’s program or activities. Recipients or sub-recipients electing not to prepare a written language implementation plan should consider other ways to reasonably provide meaningful access.” Page 6 of the LEP Handbook

### 4 Factor Analysis

#### **Factor 1: The Number and Proportion of LEP Persons Served or Encountered in the Eligible Service Population.**

As the 2013 Census numbers indicate, 93.2% of the Douglas County population is white. Only 4% of ALL of the non-white population speak a language other than English in the home and not all of them would actually be LEP since many are bilingual. This would lead us to reasonably conclude that there are very few LEP Douglas County residents.

#### **Factor 2: The Frequency with Which LEP Individuals Come into Contact with your programs, activities, and services.**

Based on the 2013 Census numbers, the most likely LEP individual in Douglas County that would have contact with a member of public transit would be a Spanish speaking individual. In an effort to be pro-active, Douglas County has provided a copy of “Basic Spanish for Transit Employees” to all public transportation drivers as well as to the Central Call Center dispatchers. However, after surveying both drivers and dispatchers they have reported that they have never encountered an LEP individual needing them to use the aforementioned publication. This fact would again be an indicator that the number of LEP individuals residing in Douglas County is very low.

#### **Factor 3: The Importance to LEP Persons of Your Program, Activities and Service.**

As reported in Factors 1 and 2, there are very few LEP individuals living in Douglas County. Public Transit drivers and dispatch have reported zero contact with LEP individuals. Consultation with some members of the Hispanic business community regarding the public

transportation needs of the Hispanic community has revealed that the majority of Hispanic Douglas County residents either have their own transportation or rely on family and friends to provide transportation. They do not rely on rural public transportation even though language is not a barrier to its use.

**Factor 4: The Resources Available to the Recipient and Costs.**

As stated earlier, the total number of LEP individuals in Douglas County is quite low. Douglas County has provided individuals who provide rural public transportation services a copy of "Basic Spanish for Transit Employees." Should there be a future need, Douglas County would be willing to translate any written public transportation document into a language that would allow a LEP person to access Douglas County public transportation services.