



Lincoln County Transportation
Service District
Title VI Program
July 2020 Update

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Table of Contents

Introduction	3
Signed Policy Statement	3
Title VI Complaint Procedures	3
Record of Title VI investigations, complaints, or lawsuits	3
Limited English Proficiency Outreach Plan	4
Notification of Transit Title VI obligations	4
Summary of Public Participation Efforts	4
Public Participation Plan	4
Attachment A	7
Attachment B	8
Attachment C	10
Attachment D	12
Attachment E	14
Attachment F	18
Attachment G	19

Introduction

This program reflects the Lincoln County Transportation Service 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 Lincoln County Transportation Service District (LCTSD).

Signed Policy Statement

A policy statement signed by the Transit Program Director can be found as **Attachment A**.

Title VI Complaint Procedures

The Lincoln County Transportation Service District 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 LCTSD'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 LCTSD at the following address:

Lincoln County Transportation Service District
Cynda Bruce, Transit Program Director
410 NE Harney Street
Newport, OR 97365
By Phone: 541-574-1292
By Facsimile: 541-574-1296

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

Record of Title VI investigations, complaints, or lawsuits

LCTSD will document, record and report to the United States Dept. of Transportation (USDOT) and the Oregon Dept of Transportation (ODOT) all Title VI complaints and allegations of Discrimination. Over the reporting period, Lincoln County Transportation Service District had no Title VI complaints, investigations or lawsuits filed against it.

Limited English Proficiency (LEP) Outreach Plan

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

- Spanish speaking translators available upon request during normal office hours.
- Route and schedule information available in English and Spanish on the LCTSD website.
- The LCTSD website is available in both English and Spanish with the Google Translate feature.

Notification of Lincoln County Transportation Service District Title VI obligations

LCTSD publicizes its Title VI program by posting its commitment to providing services without regard to race, color or national origin in all buses, bus schedules and rider guides, on the LCTSD website, and in the main transit office. The public notices, 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).
- Lincoln County Transit is committed to practicing non-discrimination. If you believe you have been subjected to discrimination you may file a complaint with the Lincoln County Transportation Service District Title VI Coordinator.

Summary of Public Participation Efforts

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

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 Lincoln County Transportation Service District (LCTSD) 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 in person, via the internet or phone and in writing for the engagement of all citizens of the region to participate in and provide comment on transportation making decisions.

Objectives:

- To determine what cultural barriers exist to public participation within the region.
- 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. LCTSD will make reasonable efforts to engage minority populations using techniques such as including notations in public notices in Hispanic 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 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 LEP 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 stage of the process, and new and different techniques will be utilized as deemed appropriate.

Construction Projects Undertaken:

Lincoln County Transportation Service District has not undertaken construction projects during this reporting period.

Additional Information:

Specific public involvement/outreach information can be found in **Attachment E**.

Attachment A

LINCOLN COUNTY TRANSPORTATION SERVICE DISTRICT TITLE VI NON-DISCRIMINATION POLICY STATEMENT

July 2020

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.”

The Lincoln County Transportation Service District is committed to complying with the requirements of Title VI in all its programs and activities. Questions and complaints may be reported to Cynda Bruce, Program Director, Lincoln County Transportation Service District at 541-574-1292; by email to cbruce@co.lincoln.or.us; or by letter to 410 NE Harney Street, Newport, OR 97365.

Cynda Bruce, Program Director
Lincoln County Transportation Service District

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 Lincoln County Transportation Service District. 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. 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, LCTSD may extend the time for filing or waive the time limit in the interest of justice, if LCTSD 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 LCTSD, the person shall be interviewed by the Transit Director. If necessary, Transit 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 LCTSD's investigative procedures.
4. Within 10 days, the Transit 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) Office of Civil Rights and U.S. Department of Transportation (USDOT) Office of Civil Rights.
5. The Transit 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 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 LCTSD has taken or proposed to resolve the issue in the complaint.
6. Within 60 days, the Transit Director will investigate of the allegation and based on the information obtained, will render a recommendation for action in a report of findings to the Lincoln County Board of Commissioner's. 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 Transit 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 LCTSD. The Transit Director will also provide ODOT and/or USDOT with a copy of this decision and summary of findings upon completion of the investigation.
 8. Any person may opt to file the complaint directly with ODOT or the FTA. Contact information for the state and federal Title VI administrative jurisdiction is as follows:

ODOT Office of Civil Rights
Attention: Title VI Program Coordinator
3930 Fairview Industrial DR SE
Salem, OR 97302
503-986-3169
503-986-6382 fax

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

Lincoln County Transportation Service District Title VI/ADA Complaint Form

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:				

<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 or court where the complaint was filed.	
Name:	
Title:	
Agency:	
Address:	
Telephone:	
Section VI	
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, mail or email this form to:

Lincoln County Transportation Service District
 Title VI Coordinator
 410 NE Harney Street
 Newport, OR 97365

cbruce@co.lincoln.or.us

LINCOLN COUNTY TRANSPORTATION SERVICE DISTRICT LIMITED ENGLISH PROFICIENT (LEP) PLAN July 2020

Lincoln County Transportation Service District 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). Lincoln County Transportation Service District 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 three years, the LEP population in our service area and region has increased.

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. *United States Census Bureau QuickFacts, Population Estimates July 1, 2019
- b. American Community Survey and Fact Finder Surveys 2011-2015 Estimates
- c. Dept. of Labor LEP Special Tabulation website Community Services Consortium

A review of the *US Census QuickFacts 2019 Population Estimates data (<https://data.census.gov>) on the numbers of limited English proficient or LEP persons revealed that in Lincoln County, Oregon the number of people over age 5 who speak a language other than English at home was 3,547 or 7.1% of the total population of Lincoln County. The most common language other than English spoken at home was Spanish. An older source sites the total Spanish population in Lincoln County at 2,549. Source: American Community Survey, 2011-2015 American Community Survey 5-Year Estimates, Lincoln County, Oregon).

Step 3: According to the American Fact Finder information from the US Census Bureau, the number of Spanish speaking LEP individuals that spoke English "not well" or "not at all" in the Lincoln County area is 652 residents of Lincoln County.

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

Lincoln County Transportation Service District serves LEP persons through demand response and Deviated-Fixed-Route services. Over the past three years, our dispatcher has taken approximately 1 phone call every three months from LEP persons in our area which required the use of an interpreter.

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

Lincoln County Transportation Service District provides important transit services to the public through its deviated fixed route, commuter bus and demand response public transit programs. Lincoln County Transportation Service District is the only major public transportation provider in Lincoln County. This public transit agency provides a vital link between all incorporated cities within Lincoln County. Some important areas served include, residential areas (particularly low-income); 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 LCTSD, that require reservations, provides approximately 7% of the total rides provided through Lincoln County Transportation Service District.

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

LCTSD provides information in Spanish through bus schedules, the transit website and a reference guide entitled “Basic Spanish for Transit Employees” for bus drivers, dispatchers and office staff. We have recently been introduced to Essential Spanish for Rural Transit through our national RTAP program (Rural Transit Assistance Program). Essential Spanish for Rural Transit is a resource to provide the most frequently asked questions passengers ask, as well as the most important messages that transit drivers need to give those passengers, in a simple English/Spanish format to facilitate effective communication through a technical brief and an accompanying quick reference card and narrated PowerPoint presentation used for training transit employees. Transit employees are currently being trained with the “Essential Spanish for Rural Transit” program. We are also considering a Language Line account, should we need their services.

Implementation Plan:

Based on the four-factor analysis, LCTSD recognizes the need to continue providing language services. A review of LCTSD relevant programs, activities and services that are being offered by the County as of June 2020 include:

- Route and schedule information are available in English and Spanish on the Lincoln County website.
- Schedules are available in English and Spanish on the Lincoln County website.
- Employees being trained in “Basic Spanish for Transit Employees”, provided by National RTAP.
- We are considering setting up an account with Language Line Services should this service be needed.

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

- Transit surveys conducted by LCTSD will be available in Spanish.
- Future route schedules will continue to be available in both English and Spanish.
- The existing telephone system may be modified to include Language Line Services.
- Continue to get transit employees trained in the “Basic Spanish for Transit Employees” program.

Lincoln County Transportation Service District’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:

- Lincoln County Public School District
- Centro De Ayuda
- Lincoln County Health and Human Services

Lincoln County Transportation Service District 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. LCTSD will then evaluate the projected financial and personnel needed to provide the requested services and assess which of these can be provided cost-effectively.

Attachment E

Public Participation Plan

Statement of Commitment.....15

Public Involvement Purpose.....15

Public Involvement Principles.....15

Targeted Public Outreach.....16

Public Comment for Fare or Major Service Changes.....17

STATEMENT OF COMMITMENT

Lincoln County Transportation Service District is committed to providing an open and transparent decision-making process to which Lincoln County residents has equal access. LCTSD will actively solicit the involvement of citizens in the public decision-making process, through public notification, media exposure, community public meetings with comment opportunities in person, over the phone and in writing.

In addition, efforts will be made to offer early and continuous opportunities for the public to be involved in the identification of social, economic, and environmental impacts of proposed transportation decisions. This includes seeking out and considering the viewpoints of minority, low-income, and limited English proficiency (LEP) populations as well as older adults and persons with disabilities. These actions will ensure our compliance with the Federal Transit Administration (FTA) Circular 4702.1B (“Title VI Requirements and Guidelines for Federal Transit Administration Recipients”).

PUBLIC INVOLVEMENT PURPOSE

The Plan shall be designed to:

1. Ensure responsiveness to the level of interest and concern expressed by the public.
2. Ensure visibility, transparency and understanding by the agencies, groups and individuals who may participate in the process.
3. Ensure that public involvement is carefully and systematically included as part of the decision-making process.

PUBLIC INVOLVEMENT PRINCIPLES

The following principles will be used to develop and implement Public Involvement for LCTSD projects and programs:

1. When a project (e.g., construction activity) may affect a neighborhood, special neighborhood meetings will be scheduled early in the project planning process. Notices will be sent to organized neighborhood groups and any individual who has requested notification.
2. All public meeting notices shall be written in clear, concise and understandable language, and will incorporate graphics when it aids the message. The notices will clearly be identified as a LCTSD notice including our name and logo. The theme font will be consistent and font size will be no smaller than 14 and be printed in English and Spanish.
3. The Public Involvement Process will reflect LCTSD’s dedication to provide early and continuous opportunities for the public to be involved

in the identification of the impacts of proposed decisions. It will also reflect LCTSD's desire to seek out the viewpoints of minority, low-income, and Limited English Proficiency (LEP) populations, as well as older adults and people with limited mobility, in the course of conducting public outreach and involvement activities, consistent with LCTSD's Title VI Program, Executive Order 13166 on access for individuals with Limited English Proficiency, and U.S. Department of Transportation (DOT) LEP Guidance.

4. Public meetings will be held in locations that are accessible to transit riders and people with disabilities and will be scheduled at times that are convenient for members of the public.
5. Public meeting, special meeting and open house notices will be broadly advertised in the community in both English and Spanish (e.g., through posters onboard buses and at major transit stops and facilities, the LCTSD website, local print media, social media, and email notification to LCTSD's outreach mailing list) including the availability of onsite language assistance when requested.

TARGETED PUBLIC OUTREACH

During development of the Public Involvement Plan and/or planning for public engagement in general, LCTSD will incorporate strategies intended to promote involvement of minority and LEP individuals in public participation activities, as appropriate for the plan, project, or service in question, and consistent with federal Title VI regulations, Executive Order 13166 on Limited English Proficiency, and the U.S. Department of Transportation LEP Guidance.

At a minimum LCTSD staff will consider implementing the following public engagement strategies to complement the appropriate plan, project, or service:

- Use supplemental outreach strategies such as surveys and comment cards regarding LCTSD projects or proposed service changes.
- Partner and network with community organizations to engage members of the public who are less likely to attend traditional public meetings through means such as surveys and focus groups. LCTSD maintains a list of current and potential future community partners.
- Attend community events and meetings of neighborhood associations, faith-based organizations, advocacy groups, and other groups to solicit feedback from diverse members of the public.

LCTSD staff may consult FTA Circular 4703.1 ("Environmental Justice Policy Guidelines for Federal Transit Administration Recipients") for additional strategies that may be incorporated into the Public Involvement Plan.

PUBLIC COMMENT FOR FARE OR MAJOR SERVICE CHANGES

It is the commitment of LCTSD to solicit public opinion and consider public comment before raising fares or implementing a major service change.

A public hearing is required prior to implementation of a fare increase or a major service change. A **“major” service change is defined as a modification that affects 15% or more of a single route or 15% or more of all routes.** Additional public involvement strategies, such as public meetings, neighborhood meetings, or other outreach to affected individuals will be implemented as appropriate to solicit public comment for consideration in advance of the public meeting. Public comments received will be compiled and considered prior to finalizing LCTSD’s recommendation to the Board of Commissioners regarding a fare increase or major service change. A summary of the public comments received will be provided as part of the staff report submitted to the LCTSD Board of Commissioners for the fare increase or major service reduction in question. It will be entered as public comment into the appropriate meeting minutes. Information about scheduled public meetings is available via:

1. Bus Postings- Postings at transfer points and Major Bus Shelters
2. LCTSD website
3. Appropriate venues, such as senior centers, human service organizations and with community partners
4. Radio, newspaper, email lists and social media

All comments received are reviewed by LCTSD staff and the STIF/STF Transportation Committee and considered in the final recommendations to the Board of Commissioners. The goal of LCTSD is to always provide the best possible service to the most current riders or potential riders.

Attachment F

STF/STIF Oversight Committee Members

Represents:

Educational Institutions/Low Income _____ White/Caucasian

User Representative _____ White/Caucasian

Public Transportation Provider* _____ White/Caucasian

Disabled Representative* _____ White/Caucasian

Elderly Representative* _____ White/Caucasian

STIF Coordinator _____ White/Caucasian

****Mandatory Representation***

Attachment G

Limited English Proficiency Plan

Introduction.....20

Plan Summary.....21

LEP Assistance.....22

Language Assistance.....22

Staff Training.....23

Outreach Techniques.....23

Monitoring and Updating the Plan.....23

Dissemination of the Plan.....24

Introduction

This Limited English Proficiency (LEP) Plan has been prepared to address Lincoln County Transportation Service District (LCTSD) responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, Federal Transit Administration Circular 4702.1B, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

Executive Order 13166, titled Improving Access to Services for Persons with Limited English Proficiency indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. LEP persons include those individuals whose primary language is not English and who have a limited ability to speak, read, write or understand English. These persons have reported to the U.S. Census that they do not speak English well or do not speak English at all.

LINCOLN COUNTY- Source: 2011-2015 American Community Survey Estimates & *United States Census Bureau QuickFacts, Population Estimates July 1, 2019

Total Population	49,962
Primary population that speaks languages other than English: (*Spanish/Other Info taken from LCTSD 2017 Title VI Program, no updates available)	
*Spanish – Speak English less than very well	1,164
*Other Languages	237
Population by Race	
White	40,968
African American	450
Asian	699
American Indian and Alaska Native	1,998
Native Hawaiian and Pacific Islander	100
Spanish	4,746
Other	1,001
Total Population by Race	49,962

Plan Summary

Lincoln County Transportation Service District operates local transportation services in Lincoln County. These services include deviated fixed route transportation, demand response and commuter transportation. LCTSD has developed this LEP plan to help identify the reasonable steps that are needed to provide language assistance to the Limited English-speaking population of our county who wish to access our services. This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available. LCTSD has conducted an analysis which surveyed and considered the following factors.

FOUR FACTOR ANALYSIS:

1. **The number or proportion of LEP persons in the service area who may be served or are likely to encounter a LCTSD program, activity or service:** The main language identified that LCTSD will encounter the most frequently is Spanish.
2. **The frequency with which LEP individuals come in contact with the program:** As a public transportation provider, it is necessary to recognize this segment of the general population. Through staff feedback and surveys, it has been concluded that Spanish-speaking LEP persons rarely have contact with the service. LCTSD will assess the frequency at which staff has or could possibly have contact with LEP persons. This includes examining census data, phone inquiries, requests for translated documents, and staff feedback. Phone inquiries and staff feedback indicate that Spanish-speaking LEP persons rarely have contact with LCTSD public transit services.
3. **The nature and importance of programs, activities or services provided by LCTSD to the LEP population:** An LEP person's inability to effectively utilize public transportation may adversely affect his or her ability to obtain health care, education, or access to employment. All the programs that are operated by LCTSD will be accessible to the LEP population. Transportation is of the utmost importance.
4. **The resources available to LCTSD and overall cost to provide LEP assistance:** This includes identifying bilingual staff, reviewing the cost of using a translation service, determining which documents should be translated, and deciding what level of staff training is needed.

LEP ASSISTANCE

LCTSD has assessed the available resources that could be used for providing LEP assistance, including determining how much a professional interpreter and translation service would cost on an as needed basis, which of its documents would be the most valuable to be translated if the need should arise, and taking an inventory of available organizations that LCTSD could partner with for outreach and translation efforts. The amount of staff and vehicle operating training that might be needed was also considered. Documents that are determined to be vital are translated into Spanish. Vital documents are defined as those documents without which a person would be unable to access services. The following are written communications that are to be available in print in Spanish:

- LCTSD fixed route bus schedules, including Connector schedules
- Temporary signs at bus stops and transit centers informing customers of any detours or route changes
- Interior bus posters
- Fare information
- Onboard surveys
- Service Improvement Forms

LANGUAGE ASSISTANCE

There are numerous language assistance measures available to LEP persons, including both oral and written language services. There are also various ways in which LCTSD staff can communicate and respond to LEP persons, whether in person, by telephone or in writing.

1. LCTSD will network with local human service organizations, Centro De Ayuda, local k-12 School District (LCSD) and the local Community College that provides services to LEP individuals and seek opportunities to provide information on LCTSD programs and services.
2. LCTSD will place statements in notices and publications that interpreter services are available for public Board meetings, open house events, committee meetings and budget meetings with seven-day advance notice. Route change information will be printed in Spanish.
3. LCTSD will conduct a survey of bus drivers, front-line staff, dispatchers, and administrative employees on their experience concerning any contacts with LEP persons during the previous year. This will help us track trends and identify how best to make changes to meet the needs of our LEP population.
4. We will provide Language Identification Flashcards at the Transit Office.
5. LCTSD will post the LCTSD Title VI Policy and LEP Plan on the agency website www.co.lincoln.or.us/transit
6. LCTSD will provide group travel training to LEP persons with the assistance of bilingual volunteers.
7. A list of volunteers will be compiled to refer to when needed for translation.

STAFF TRAINING

The following trainings will be provided to LCTSD staff.

1. Information on the LCTSD Title VI Procedures, Statements and LEP responsibilities.
2. Description of language assistance services offered to the public.
3. Directions on how to use the Language Identification Flashcards.
4. Procedures for documentation of language assistance requests.
5. How to access and use a language line service.
6. How to document and handle a potential Title VI/LEP complaint.
7. How to use the booklet “Basic Spanish for Transit Employees”
8. How to use the materials for “Essential Spanish for Rural Transit” provided by National RTAP (Rural Transit Assistance Program).

OUTREACH TECHNIQUES

When staff prepares a document or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population. Interpreters will be available as needed. LCTSD will keep the LEP community engaged and aware of all types of changes in schedules, fares, programs or services. Open house events will be staffed with Spanish speaking staff.

MONITORING & UPDATING THE LEP PLAN

This plan is designed to be flexible and should be viewed as a work in progress. As such, it is important to consider whether new documents and services need to be made accessible for LEP persons, monitor changes in demographics and types of services and to update the LEP plan when appropriate. At a minimum, LCTSD will follow the Title VI Program update schedule for the LEP plan. Each update should examine the following:

- How many LEP persons were encountered?
- Is the existing language assistance meeting the needs of LEP persons?
- What is the current LEP population in Lincoln County? Has that changed from the past year?
- Have available resources, such as technology, staff and finances changed?
- Were any complaints received?
- Do staff members understand the LEP plan policies and procedures?

There are several methods that can be used to assist in answering these questions. One method is to review customer comments and complaints in our Service Comment forms and dispatch log to determine if there were any barriers to accessing service.

Census data will also be reviewed as it becomes available to determine changes in the LEP population. Surveys of staff will assist in determining if additional measures need to be taken in the updating of the plan. These surveys will be conducted every 2 years.

DISSEMINATION OF THE LEP PLAN

A link to the LCTSD LEP Plan and the Title VI Procedures is included on the LCTSD website at www.co.lincoln.or.us/transit. Any person or agency with internet access will be able to view and download the plan from the LCTSD website. Alternatively, any person or agency may request a copy of the plan via telephone, email, fax, mail, or in person and will be provided a copy of the plan at no cost. LEP individuals may request copies of the plan in translation which LCTSD will provide within an appropriate amount of time. Questions or comments regarding the LEP Plan may be submitted to the Director of LCTSD.