

2018

Civil Rights Program

Title VI, Limited English Proficiency Plan

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Introduction

This program reflects the City of Canby's commitment to ensuring that no person shall, on the ground 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 provided by the City of Canby or Canby Area Transit (CAT)

Signed Policy Statement

A policy statement signed by the Transit Director assuring Canby Area Transit's compliance with Title VI of the Civil Rights Act of 1964 can be found as *Appendix A*.

Notification of CAT's Title VI Obligations

Canby Area Transit publicizes its Title VI program by posting the following notices in English and Spanish on the CAT website, in customer brochures, on all buses, and at the following City owned facilities in Canby:

- Canby Area Transit (CAT) offices, 195 S Hazel Dell Way Suite C; *on the wall near the front desk*
- Canby Area Transit (CAT) Transit Center, 100 N Ivy Street; *in the information triosk*
- Canby Civic Offices, Council Chambers, 222 NE 2nd Avenue (1st Floor); *in the Council Chamber room on the back wall*

Title VI Notice to the Public – English

PUBLIC NOTICE Title VI Non-Discrimination Policy

Canby Area Transit respects civil rights

The City of Canby and Canby Area Transit (CAT) operate equal opportunity programs without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act, ORS Chapter 659A or other applicable law. For more information contact the Transit Director at 503 266-4022, Oregon Relay Service 800 735-2900 or email cat@canbyoregon.gov.

Canby Area Transit's Title VI Policy Statement

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." Canby Area Transit is committed to complying with the requirements of Title VI in all of its programs and activities.

Making a Title VI Complaint

Any person who believes that they have been aggrieved by an unlawful discrimination practice under Title VI may file a complaint with Canby Area Transit, a department of the City of Canby. Such complaints must be made in writing and filed with the City of Canby within 180 days following the date of the alleged discrimination occurrence. For information on how to file a complaint, contact CAT by any of the methods provided below. Complaint forms may be downloaded from our website at www.canbyareatransit.org

Mail:

Canby Area Transit (CAT)
Transit Director
PO BOX 930
195 S Hazel Dell Way, Suite C
Canby, OR 97013

Phone: 503-266-0751

Oregon Relay Service 800 735-2900

FAX: 503-263-6284

Email: cat@canbyoregon.gov

A complainant may also file a complaint directly with the Federal Transit Administration: Office of Civil Rights, Attn: Title VI Program Coordinator, East Building 5th Floor, TCR, 1200 New Jersey Ave., SE, Washington, DC 20590; or Oregon Department of Transportation, Office of Civil Rights – MS 23, 3930 Fairview Industrial Drive SE, Salem, OR 97302.

If information is needed in another language please contact us at 503-266-0751.

Title VI Notice to the Public – Spanish

Aviso Público **Título VI Política de No Discriminación**

El Área de Tránsito de Canby respeta los derechos civiles

De acuerdo con el Título VI de la Ley de Derechos Civiles, con ORS Capítulo 659A o con otras leyes aplicables. El Transporte del Área de Canby (CAT) opera programas ofreciendo igualdad en la oportunidad sin considerar la raza, el color, el origen nacional, la religión, la edad, el estado social, la preferencia sexual, o cualquier discapacidad. Para más información contacte al Director del Transporte del Área de Canby al 503 266-4022, al Servicio de Retransmisión de Oregon al 800 735-2900 o email a cat@canbyoregon.gov.

Declaración de la Política del Título VI del Transporte del Área de Canby

El Título VI de la Ley de Derechos Civiles de 1964 establece:

“Ninguna persona en los Estados Unidos, por motivos de raza, color, o nacionalidad de origen, será excluida de participar en, de recibir beneficios, o de ser sujeta a discriminación dentro de cualquier programa o actividad que reciba ayuda financiera Federal. El Transporte del Área de Canby está comprometido a cumplir con los requisitos del Título VI en todos sus programas y actividades.

Cómo hacer una Queja bajo el Título VI

Toda persona que crea que ha sido agredida por una práctica discriminatoria ilegal según el Título VI puede presentar una queja ante el Transporte del Área de Canby, un departamento de la Ciudad de Canby. Tales quejas deben hacerse por escrito, presentarse ante la Ciudad de Canby dentro de los 180 días siguientes a la fecha del alegado acto discriminatorio. Para información sobre cómo presentar una queja, contacte a CAT mediante cualquiera de los medios provistos debajo. Las formas para realizar una queja deberán ser descargados de la página web www.canbyareatransit.org

Correo:

Transporte del Área de Canby (CAT)
Director de Tránsito
PO BOX 930
195 S Hazel Dell Way, Suite C
Canby, OR 97013

Teléfono: 503 266-0751

Servicio de Retransmisión de Oregon 800 735-2900

FAX: 503 263-6284

Correo Electrónico: cat@canbyorego.gov

El demandante también puede presentar una queja directamente a la oficina de Administración Federal de tránsito: Office of Civil Rights, Attn: Title VI Program Coordinator, East Building 5th Floor, TCR, 1200 New Jersey Ave., SE, Washington, DC, 20590; o Oregon Department of Transportation, Office of Civil Rights – MS 23, 3930 Fairview Industrial Drive SE, Salem, OR 97302.

Si se necesita información en otro idioma contáctenos al (503) 266.0751

Title VI Complaint Procedure (English) (Spanish – Appendix B)

Any person who believes he or she has been discriminated against on the basis of race, color, or national origin by the City of Canby- Canby Area Transit may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form which can be accessed as indicated in the notice above. Our process for addressing a civil rights complaint is as follows:

- Once the complaint is received, CAT will review it to determine if the City has jurisdiction. The complaint will be logged and the complainant will receive an acknowledgement letter within 14 days informing her/him whether the complaint will be investigated by our office.
- Any complaint CAT receives that deals with federal civil rights issues will be reviewed by the Transit Director and forwarded to the City Administrator, Risk Manager, and City Attorney.
- Once the City logs the complaint CAT has 60 days to resolve the issue, not including the appeal process.
- An investigation will be conducted which will include the basis of the alleged complaint; when and where the incident occurred; and, as necessary, the identification and interview of involved parties, the review and pertinent documents and other factual information from appropriate sources.
- In the case of federal civil rights issues, all information and discussions relating to the investigation are maintained and retained in an investigation file. Information will be kept as confidential as possible.
- Based upon conclusion of a thorough investigation the City of Canby - CAT will follow up with the complainant. This follow up will include 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 summarizes the findings and suggests appropriate action along with proposed resolution.
- If the complainant wishes to appeal the decision, he/she has 14 days after the date of the letter or the LOF to submit in writing a request for an appeal to the Transit Director for review by the Transit Advisory Committee (TAC). The complainant may have an opportunity to be heard in person at a TAC meeting. Following the TAC review and recommendation the City Council will make a final decision.

Title VI Complaint Form (English & Spanish)

Refer to Appendix C and D

Transit-related Title VI Investigations, Complaints and Lawsuits

The City of Canby maintains an active log of all civil rights complaints. A copy of the current log is available upon request by submitting a public records request. A public records request is available on the City website at the following link; [City of Canby Public Records Request](#). CAT has no Title VI complaints, investigations, or lawsuits filed against it.

Public Participation Plan

The City of Canby - CAT's public involvement strategy offers continuous opportunities for the public to be involved in proposed transportation decisions, such as service design changes, new services, fare changes, and changes of service policy. The primary mechanism for the public to participate is to attend the Transportation Advisory Committee (TAC) meetings or City of Canby City Council meetings. Agendas for all of these meetings are posted on the City website. Transit related public hearings and special meetings are also posted via press release to FlashAlert Newswire & Messenger and published in the local paper. All meetings have a public comment period on the agenda. The meetings are open public meetings and held in locations that are wheelchair accessible. Interpretation or translation is provided as appropriate or is always available upon request.

All City of Canby public meetings offer translation services and information in alternate formats and minutes from the meeting are available in English and other languages upon request. Since the fall of 2017 the TAC meeting agendas are provided in English and Spanish. The TAC meeting is held at least 6 times a year on the fourth Thursday of January, March, May and September and the third Thursday of November at 6:00 pm in the Canby City Council Chambers, 222 NE 2nd Avenue (1st Floor), Canby, Oregon. The City Council meetings are held monthly on the first and third Wednesdays at 222 NE 2nd Avenue (1st Floor), Canby, Oregon. City Council meetings are also broadcast live over the local cable television station.

CAT meets the goals outlined in the Oregon Department of Transportation Public Transit State Management Plan for public involvement. CAT seeks out and considers the viewpoints of minority, low-income and LEP populations in the course of conducting public outreach and involvement activities (refer to LEP plan attached). CAT provides private sector providers with a reasonable opportunity to comment on plans, programs, and to be included in coordinated plans. The following is a general description of CAT processes, which vary depending on the subject, purpose and scope of the program, policy or decision.

- a. Rider and general public surveys
- b. Open public meetings (TAC, City Council, Planning Commission)
- c. Technical work groups
- d. Website information
- e. Solicitation of comments
- f. Involve customers and potential customers in development of plans, policies, service changes, and funding decisions. CAT conducts broad outreach during planning processes such as Transit Master Plan, Title VI Plan or ADA plan updates or major service changes and riders, general public and stakeholders are notified and invited to participate and comment.
- g. Make plans available in alternate formats, Spanish, and other languages as necessary and hold public hearing(s) with adequate notice of the hearing, including advertisement in local paper, on website, and to special interest circulation.
- h. Develop contacts and mailing lists for LEP and ADA customers and transit stakeholders.

Summary of Public Participation Efforts

CAT complies with grant-related public involvement requirements as defined by grant application documents. The following is a summary of CAT's public participation efforts since the 2014 update of the Title VI Plan.

Printed Materials

CAT has translated service information on CAT's website and published materials into Spanish. General information about CAT services is posted on CAT's website in English and Spanish and translations to other languages are available upon request. Fixed route schedules and Dial-A-Ride service information are printed and distributed in English and Spanish. Outreach materials, surveys, flyers, press releases and meeting notices for major service changes are available in English and Spanish.

Phone Access

CAT's phone system includes a Spanish option on the CAT recorded messages. CAT contracts for translation or interpretation services over the phone through Certified Languages International. Dispatchers are able to connect non-English speaking customers to a translator to respond to questions about CAT services.

Planning and Service Changes

Since 2007 CAT has conducted targeted outreach to the Limited English Proficiency populations in Canby. Outreach efforts of any kind are conducted in both English and Spanish. CAT maintains contracts for translation or interpretation services as follows: over the phone interpretation primarily through Certified Languages; written translation primarily through International Passport to Languages; in-person simultaneous Interpretation through IRCO Interpretation Services, and MultiCultural Collaborative (MCC) whenever needed. The following lists the outreach efforts conducted since the last Title VI update:

Title VI Plan Update

To bring the list up to date, we have included the outreach effort for the Title VI Plan that was adopted on October 15, 2014. This outreach effort established a new level of outreach to Spanish speaking riders and residents of Canby and set the bar for us. In addition to contacting stakeholder groups, the faith community, service organizations, riders, social service agencies, non-profits, the public, and others on our Limited English Proficiency Community Contact List we held a public hearing and informational meeting regarding the Title VI Plan on September 23, 2014 and presented the meeting in both English and Spanish. At the public hearing we had 16 individuals in addition to the Transit Advisory Committee in attendance. Nine people made public comment. Seven of those people were Spanish speakers utilizing the interpreter. In the 2014 Title VI Plan outreach process we learned a lot about how the Spanish speaking community wants to be contacted. One of the most productive methods for getting information to the Spanish speakers in Canby is to attend events held by the non-profit Bridging Cultures. These events are well attended and provide a good face to face opportunity to meet people who speak Spanish. We also attended

English as a Second Language (ESL) classes conducted at the library, sent bilingual fliers to the Canby schools for distribution, posted bilingual information on the buses and at the transit center, posted information on social media (Facebook), conducted a survey and worked with the Spanish Librarian at the Canby Library who assisted with the outreach. This outreach effort resulted in the highest Spanish speaker participation in CAT's history (up to that time). We received 210 English surveys and 46 Spanish surveys during this effort.

ADA Plan Update

On January 6, 2016 the Canby City Council approved the 2016 version of the CAT ADA Plan – Americans with Disabilities (ADA) Plan at a public meeting with opportunity for public comment. The ADA Plan was also on the Transit Advisory Committee agenda with opportunity for public comment. The update was to small details like address, phone number and email updates and format changes. A more extensive outreach for the ADA Plan was conducted in 2014 when there were substantive changes to the plan. The outreach for this update was conducted in both English and Spanish which included the usual outreach methods including: a FlashAlert Newswire press release, website posting, social media posting, local newspaper postings and a presentation with opportunity for public comment at a Transit Advisory Committee and a Canby City Council meeting.

Transit Master Plan Update and Recommended Service Changes

In September of 2016, CAT began a planning process that would last more than a year. Jarrett Walker + Associates (JWA) was selected as the planning consultant for the project. The scope of work included targeted outreach to, and involvement of, Spanish speakers in the planning effort. To accomplish this JWA included MultiCultural Collaborative (MCC) consultants in their proposal to address the Spanish speaker outreach effort.

In November of 2016, JWA and MCC consultants attended the Bridging Cultures Thanksgiving dinner event to meet and greet Spanish speakers and distributed a questionnaire which was used to compile a list of interested Spanish speaking contacts. ESL classes were also attended. The full arsenal of stakeholders were contacted, encouraged to participate and share the information with their contacts. Bilingual web-links were established to communicate the planning process meeting dates, a link to the survey and other pertinent details. An email address, phone numbers for texting and voice contact were offered to both English and Spanish speakers as options for sending and receiving information.

Ultimately, a group of 36 stakeholders spent four hours in a bilingual training and workshop. In a poll at the end of the workshop, 11 of them said they believed the City should prioritize investments in a new local circulator, whereas 17 said more frequency on Route 99 should be the top priority. This workshop was conducted with simultaneous Spanish interpretation. Food and childcare were provided. We also offered a \$20 stipend to those who attended.

Also, 175 people took a bilingual survey in print or online. Of these people, 63 preferred a local circulator and 100 preferred more service on Route 99. The most common free-form comment in the surveys was a request for weekend service.

The Transit Advisory Committee recommended unanimously to City Council that a phased improvement plan be adopted, in which the first step would be increased service on Route 99. The full plan (in English) and a summary document are available online at www.canbyareatransit.org under the Plans & Policies link. The new service on Route 99 was added in April of 2018. At the same time the route name was changed to the Route 99X. Outreach for the service changes happened directly following the Transit Master Plan process and included outreach to all stakeholders through the process that is becoming familiar to both English and Spanish speakers in our community.

Transit Master Plan - Project List Priorities

HB2017 established the Statewide Transit Improvement Fund (STIF) which had not been anticipated during the CAT Transit Master Plan process. The CAT Transit Master Plan was drafted with a neutral funding forecast. Although there are projects identified as next steps under Phase 2 of the plan these projects were not prioritized. So in order to compile an eligible list of projects to be included in the TriMet STIF Plan CAT conducted another outreach effort in June and July of 2018. The short timeline to accomplish this had some impact because schools were out for the summer. Otherwise, we were able to contact the stakeholder groups. This effort kicked off with a Bridging Cultures event on June 23, 2018. Bilingual fliers about the upcoming public hearings and survey were distributed along with paper copies of the survey and the press release (also bilingual). The four question survey was also distributed in paper format as well as online between June 20th and July 20th (in English and Spanish). Public hearings were held on June 28th and also on July 19th. Ultimately we received 210 English responses and 30 Spanish responses. All respondents preferred Saturday service over a local circulator by 74% (DAR and Fixed); English speakers preferred Saturday by 72% and Spanish speakers by 95%.

Administrative Changes

Since the last update to this plan, CAT modified the resolution establishing the Transit Advisory Committee (TAC). This modification made several corrections and clarifications but the substantive change was to the number of times annually that the committee is required to meet. The new requirement is “at least six (6) times per year”. This was recommended by the Transit Advisory Committee at their meeting on November 17, 2016 and approved by the City Council on January 4, 2017. Both actions happened during public meetings with opportunity for public comment and advance notice by agenda postings on the CAT and City of Canby website. During discussions of the TAC it was suggested that recruitment of LEP population individuals to the TAC might be improved by reducing the number of meetings TAC members are required to attend and adjusting the time of the meetings. This action changed the number of meetings requirement by reducing it from 12 times per year to 6 times and in 2018 the meeting time was adjusted by 30 minutes from 5:30 pm to 6:00 pm.

Future Planning Efforts

In addition to the outreach effort for this Title VI Plan we will update our ADA Plan and adopt a new Facilities plan in early December of 2018. Also, in late 2018 or early 2019 CAT will conduct an outreach effort to determine the details of the new Saturday service that has been prioritized to

begin in July of 2019. Prior to 2021, CAT will need to conduct another focused planning effort in order to identify the need for service improvements as well as facility and capital project improvements. Since the adoption of the 2014 Title VI Plan CAT has learned a lot about reaching and involving the LEP riders and residents of our community.

Over the past year CAT has incorporated simultaneous Spanish interpretation at its public hearing meetings and offered it upon request. During our Transit Master Plan process we also found that the preferred mechanism for contacting our Spanish speaking stakeholders, community members and riders is via text message. We are working on a method to facilitate the need for Spanish texting and also meet our public records requirements.

Language Assistance Plan (LEP)

According to the US Census Bureau and the *2012-16 American Community Survey 5-year Estimates* the population of Canby is ¹approximately 20.1 percent Hispanic or Latino. In the City of Canby, all other races and ethnicities comprise less than 3 percent of the total population. The *American Community Survey* also estimates that 16.7 percent of Canby residents speak Spanish at home.

CAT's services are important to all populations served. Services help all riders including Hispanic and Latino individuals access a wide range of services in the community. Although it is unknown whether non-English speakers use CAT's services more or less frequently than all riders as a whole, CAT has determined that Spanish language translation services are needed because of the high number of Hispanic and Latino individuals living in the community. CAT's Language Assistance Services include:

- Translation of written materials: All service information on the CAT website and in published materials is translated into Spanish.
- Ad hoc language translation services: Ad hoc language translation and interpretation services are available for Spanish and other languages as needed for individuals who call the office. CAT contracts with translation services that offer written translation and verbal interpretation for Spanish and other languages as requested or as appropriate.

LEP Monitoring and Updates

CAT monitors the linguistic needs of its riders both formally and informally. Formally, CAT reviews available census data during each update of its Title VI Plan to determine whether adjustments to this LEP plan are required. CAT also maintains communication with the Canby School District to monitor demographic trends at a micro level. These data sources, combined with informal reports from the community help CAT maintain a current understanding of local linguistic patterns. Changes to the LEP plan are determined by the TAC and ultimately approved by the Canby City Council.

¹ See Appendix E, F, G, and H for additional details.

Employee LEP Training

CAT trains employees to provide limited language assistance services to LEP persons. Staff and contractors are trained how to access an interpreter on the phone through Certified Languages International for phone calls; and for instances when non-English speakers visit the office. Staff are trained how to use a visual aide with the words “what language do you speak” written in 23 different languages to identify what language the individual needs interpreted.

Minority Representation Table

	Caucasian	Latino	African American	Asian American	Native American
Service Area Population	74.8%	20.1%	.1%	2.2%	.2%
City Council	100%	0%	0%	0%	0%
TAC Committee	100%	0%	0%	0%	0%

Title VI Equity Analysis

CAT is aware of Title VI requirements to conduct equity analyses for all facility construction projects. CAT will follow requirements under the National Environmental Policy Act and other overarching planning processes to guide equitable consideration of facility sites and impacts.

Fixed Route Service Standards & Policies

Vehicle Load

The average of all loads during the peak operating period does not exceed vehicles’ achievable capacities. CAT owns 3 35’ coaches (seating capacity 33-35), 9 minibuses 21’ – 26’ (seating capacity 14-21), 1 minivan (seating capacity 3).

Vehicle Headway

CAT’s Route 99X commuter service operates Monday through Friday along 99E between Oregon City and Woodburn (via Canby). The service operates with 60 minute headways between Oregon City and Woodburn from 5:25 am to 6:25 pm; and with approximately 30 minute headways between Canby and Oregon City during the commute peak. The route provides at least hourly service between Canby and Oregon City from 9:00 am to 3:00 pm and from 7:00 pm to 10:00 pm. The only fixed-route service at this time is along Highway 99E within the City of Canby. CAT offers a General Public Dial-A-Ride service to all individuals traveling within the Canby Urban Growth Boundary between 8 am to 6 pm Monday through Friday. For customers who qualify, CAT also provides Paratransit services within Canby and a premium service which operates from 6 am to 8 pm Monday to Friday. Scheduling involves the consideration of a number of factors including: ridership productivity, transit/pedestrian friendly streets, density of transit-dependent population and activities, relationship to the Regional Transportation Plan, relationship to major transportation developments, land use connectivity, and transportation demand management.

On-time Performance

CAT's 2017-18 on-time performance for the Route 99X commuter route was 99.91 % and 91.8% for Dial-A-Ride service.

Service Availability

CAT operates transit services in a slightly enlarged Canby Urban Growth Boundary. The service area is approximately 51.7 square miles. Countywide there are approximately 200 persons per square mile. The CAT service area has an estimated population of 18,712. The general public Dial-A-Ride is available to 100% of the residents living within the service area. (*Appendix F*). The commuter fixed-route service travels on Highway 99E from Woodburn to Oregon City and is available within 1 mile of 63% of residents within the CAT service area. CAT makes connections with TriMet in Oregon City and Woodburn Transit and Cherriots in Woodburn.

Amenities

There is one transit center within the City of Canby. CAT owns and operates the transit center located at 100 N Ivy Street which includes a driver break-room and public restroom, clock gazebo, 2 bus shelters, information triosk and 7 reserved park and ride parking spaces. There are 38 bus stop signs installed along CAT's Route 99X.

Vehicle Assignment Policy

Vehicles are assigned based on the type of service being provided and operating characteristics of the route or demand response service. There are 3 35' coaches in the fleet that are assigned only to the Route 99X service. There are also 2 small cutaway buses with hydraulic wheelchair lifts and one minivan that are only assigned to the demand responsive service. The fleet also includes 7 cutaways that are assigned to both the Route 99X and demand response depending on availability. CAT is able to operate with a smaller fleet by occasionally using cutaway buses on the fixed route. There is currently one driver schedule that operates as demand response for a portion of the shift and fixed route for a portion of the shift. Blending the fleet allows us more flexibility and requires fewer back up vehicles for the fixed route service.

Appendices

Appendix A:	Policy Statement
Appendix B:	Title VI Complaint Procedures (Spanish)
Appendix C:	Title VI Complaint Form (English)
Appendix D:	Spanish Title VI Complaint Form (Spanish)
Appendix E:	2016 Census Data for City of Canby
Appendix F:	CAT Service Area Map
Appendix G:	Speak Spanish at Home Map
Appendix H:	Limited English Proficiency Plan (LEP)
Appendix I:	Limited English Proficiency Community Contact List
Appendix J:	Census Tract Map

Appendix A: Policy Statement



City of Canby

PO Box 930 Phone: 503.266.4021
222 NE 2nd Ave Fax: 503.266.7961
Canby, OR 97013 www.canbyoregon.gov

Canby Area Transit Title VI Non-Discrimination Policy Statement

July 27, 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.”

Canby Area Transit is committed to complying with the requirements of Title VI in all of its programs and activities.

Julie Wehling
Transit Director

Appendix B: Title VI Complaint Procedures (Spanish)

Titulo VI Procedimiento para Presentar Reclamos (Español)

Toda persona que cree que ha sido discriminada por su raza, color, u origen nacional, por el Área de Transito de la Ciudad de Canby, puede presentar un reclamo Titulo VI, al completar y entregar el Formulario de Reclamo Titulo VI, que se puede obtener como indicado arriba. El procedimiento que nosotros seguimos para recibir un reclamo sobre los derechos civiles, es el siguiente:

- Una vez que se haya recibido el reclamo, CAT lo revisará para determinar si la Ciudad tiene jurisdicción. Se tomará nota de la recepción y el reclamante recibirá una carta aviso dentro de los 14 días, informándole si se procederá a investigación.
- Todo reclamo que reciba CAT que tiene que ver con asuntos de derechos civiles a nivel federal, será revisto por el Director de Tránsito, y enviado al Administrador de la Ciudad, el Encargado de Riesgos y al Fiscal de la Ciudad.
- Una vez que la Ciudad tome nota del reclamo, CAT tiene un plazo de 60 días para resolver el asunto, sin incluir el proceso de apelación.
- Se llevará una investigación que incluirá el fundamento del supuesto reclamo; cuándo y dónde ocurrió el incidente; y, si es necesario, la identificación y entrevista de las partes involucradas, la revisión de documentación pertinente, y de otra información fáctica de fuentes apropiadas.
- En casos de derechos civiles a nivel federal, toda información y conversación es respetada, y los documentos relacionados con la investigación serán guardadas en un archivo confidencial
- Al concluir una exhaustiva investigación por parte de la Ciudad de Canby, CAT se pondrá en contacto con el reclamante. Este contacto incluirá una de dos cartas al reclamante: una carta de cierre del caso, o una carta de resumen de lo determinado. Una carta de cierre del caso resume las alegaciones y explica que no se encontró una violación al Título VI, y que por ende el caso se considera cerrado. Una carta de prueba, resume las alegaciones y también las entrevistas del supuesto incidente, y resume la prueba, sugiriendo una acción apropiada a seguir, además de una resolución del caso.
- Si el reclamante desea apelar la decisión, él o ella tiene un plazo de 14 días después de la fecha de la carta cierre o la carta resumen, para presentar por escrito un pedido de apelación al Director de Tránsito, para ser revista por el Comité de Consejos del Tránsito (TAC). El reclamante tendrá oportunidad de ser atendido y oído en persona en una junta del TAC. Después de la revisión y recomendación por parte del TAC, el Consejo de la Ciudad tomará la decisión final.

Appendix C: Title VI Complaint Form (English)

Title VI Complaint Form (English)

6-13-2018

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 <input type="checkbox"/> Religion <input type="checkbox"/> Age <input type="checkbox"/> Marital Status <input type="checkbox"/> Sexual Orientation <input type="checkbox"/> Disability			
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 Civil Rights complaint with this agency?		Yes	No
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, or mail this form to:

Mail:

City of Canby
Transit Director
PO BOX 930
195 S Hazel Dell Way, Suite C
Canby, Oregon 97013

Phone:

503-266-0751
Oregon Relay Service 800 735-2900

Fax: 503-263-6284

Email: cat@canbyoregon.gov

Appendix D: Title VI Complaint Form (Spanish)

Title VI Complaint Form (Spanish)

City of Canby, Canby Area Transit - Título VI Forma de Queja

Sección I				
Nombre:				
Dirección:				
Teléfono (Casa):			Teléfono (Trabajo):	
Correo Electrónico:				
Formatos accesibles en:	Letra Grande		Cinta de audio	
	TTY		Otro	
Sección II				
¿Está usted presentando esta queja en su propio nombre?			Sí *	No
* Si usted contestó "sí" a esta pregunta, pase a la sección III.				
Si no es así, por favor proporcione el nombre y la relación de la persona por la que usted se queja:				
Por favor, confirme que ha obtenido el permiso de la parte agraviada si usted está presentando en nombre de un tercero.				
Por favor, explique por qué usted está presentado la queja por un tercero:			Sí	No
Sección III				
Cree que la discriminación que experimentó fue basada en (marque todo lo que corresponda): <input type="checkbox"/> Raza <input type="checkbox"/> Color <input type="checkbox"/> Origen Nacional				
Fecha de la discriminación alegada (Mes, Día, Año): _____				
Explique lo más claramente posible lo que pasó y por qué cree que fue discriminado.				
Describa a la persona (s) que participaron, incluyendo el nombre y la información de contacto de la persona (s) que lo discriminó (si se tiene). Liste el nombre e información de contacto de cualquier testigo. Si se necesita más espacio, adjunte páginas adicionales..				
Sección IV				
¿Ha presentado anteriormente una queja de Derechos Civiles con esta agencia?			Sí	No
¿Ha presentado anteriormente una queja del Título VI con esta agencia?			Sí	No
Sección V				
¿Ha presentado esta queja en cualquier otra agencia federal, estatal o local, o con cualquier corte federal o estatal? <input type="checkbox"/> Sí <input type="checkbox"/> No				

En caso afirmativo, marque todo lo que corresponda y escriba el nombre de la agencia o de la corte:		
<input type="checkbox"/> Agenda Federal _____	<input type="checkbox"/> Corte Federal _____	
<input type="checkbox"/> Agenda Estatal _____	<input type="checkbox"/> Corte Estatal _____	<input type="checkbox"/> Agencia Local _____
Sírvanse proporcionar información acerca de la persona de contacto en la agencia o tribunal donde se presentó la queja.		
Nombre:		
Título:		
Agencia:		
Dirección:		
Teléfono:		
Sección VI		
Nombre de la agencia de la cual la queja es en contra:		
Persona de contacto:		
Título:		
Teléfono:		

Por favor adjunte cualquier material escrito o cualquier otra información que usted piensa que es relevante para su queja.

Firma y fecha abajo requieren.

_____	_____
Firma	Fecha

Por favor, envíe este formulario por fax, correo o correo electrónico:

Correo:
City of Canby
Transit Director
PO BOX 930
195 S Hazel Dell Way
Canby, Oregon 97013

Teléfono:
503-266-0751
Oregon Relay Service 800 735-2900

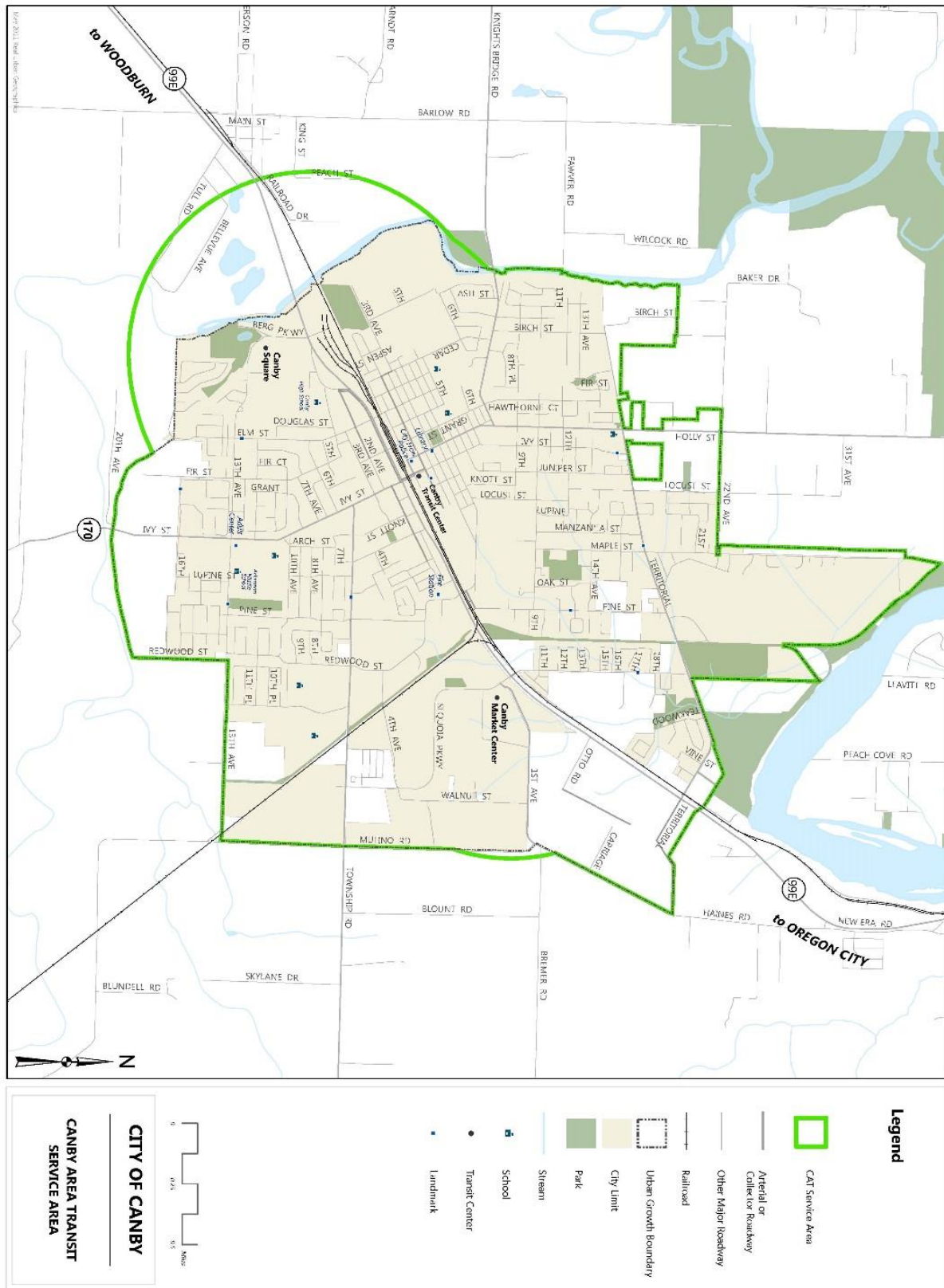
Fax: 503-263-6284
Correo Electrónico: cat@canbyoregon.gov

Appendix E: 2016 Census Data for City of Canby:

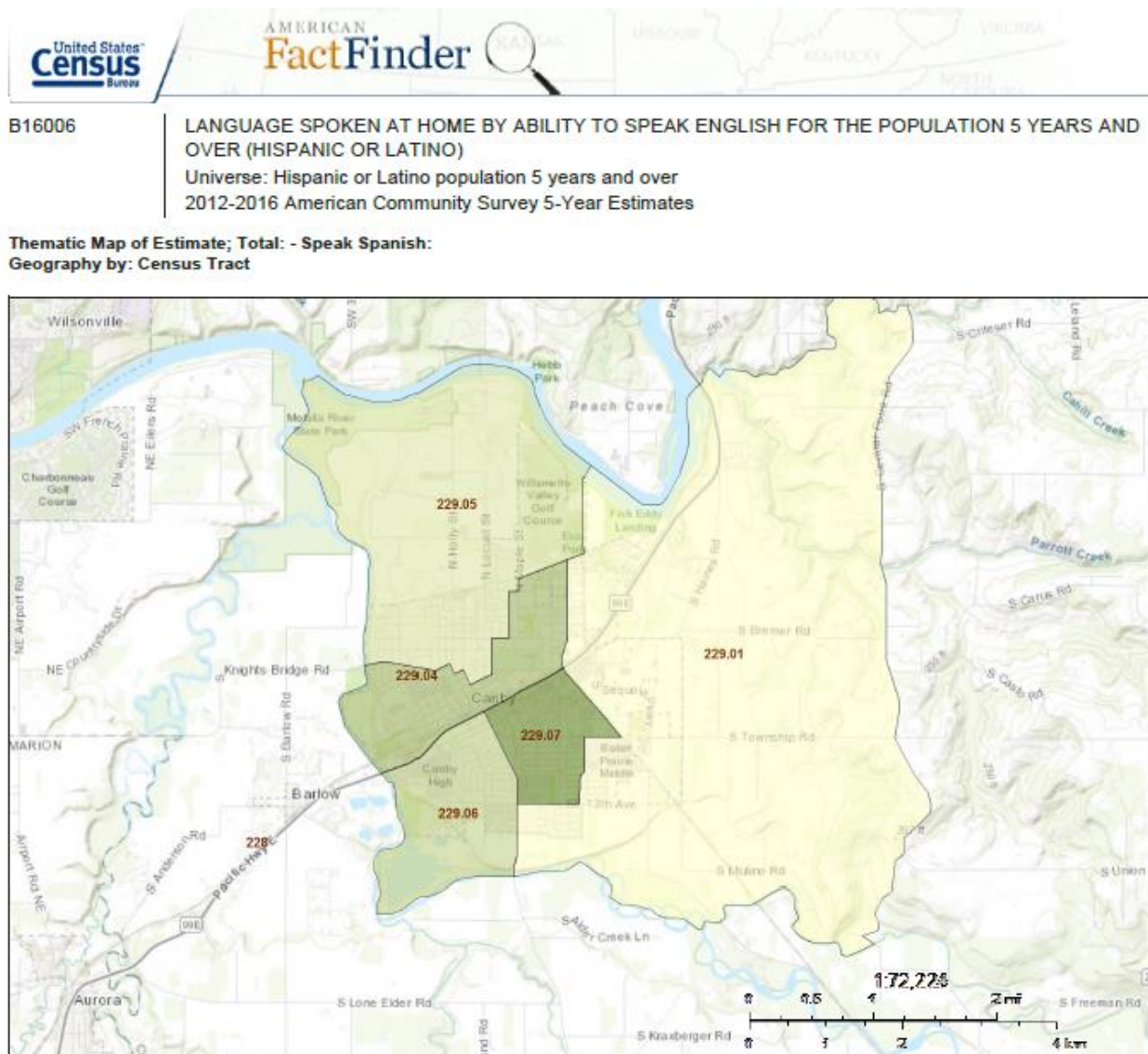
The following table displays demographic data from the 2012-2016 American Community Survey 5-Year Estimates.

Canby Area Transit (Canby UGB)		
	Estimate	Percent
RACE		
Total population	17,218	17,218
One race	16,654	96.70%
Two or more races	564	3.30%
White	14,878	86.40%
Black or African American	13	0.10%
American Indian and Alaska Native	102	0.60%
Asian	383	2.20%
Native Hawaiian and Other Pacific Islander	0	0.00%
Some other race	1,278	7.40%
Two or more races	564	3.30%
HISPANIC OR LATINO AND RACE		
Total population	17,218	17,218
Hispanic or Latino (of any race)	3,453	20.10%
White alone	12,880	74.80%
Black or African American alone	13	0.10%
American Indian and Alaska Native alone	30	0.20%
Asian alone	383	2.20%
Native Hawaiian and Other Pacific Islander alone	0	0.00%
Some other race alone	34	0.20%
Two or more races	425	2.50%
DP05: ACS DEMOGRAPHIC AND HOUSING ESTIMATES		
<i>2012-2016 American Community Survey 5-Year Estimates</i>		

Appendix F: CAT Service Area Map



Appendix G: Speak Spanish at Home Map



Legend

Data Classes

- 57 - 57
- 423 - 423
- 445 - 445
- 511 - 511
- 1,118 - 1,118

2016 Boundaries

No Legend

Supporting documentation on code lists, subject definitions, data accuracy, and statistical testing can be found on the American Community Survey website in the Data and Documentation section.

Sample size and data quality measures (including coverage rates, allocation rates, and response rates) can be found on the American Community Survey website in the Methodology section.

Tell us what you think. Provide feedback to help make American Community Survey data more useful for you.

Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states,

Appendix H: Limited English Proficiency Plan (LEP)

Introduction

Canby Area Transit (CAT), operated by the City of Canby, understands its services are critically important to the daily lives of our community members. The purpose of this limited English proficiency plan is to comply with the City's responsibilities to limited English proficient (LEP) persons consistent with Title VI of the Civil Rights Act of 1964 and its implementing regulations. Title VI of the Civil Rights Act of 1964 provides that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance.

CAT has developed this Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to CAT services. A Limited English Proficiency person is one who does not speak English as their primary language and who has limited ability to read, speak, write, or understand English.

This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training staff, how to notify LEP persons that assistance is available, and information for future plan updates.

Goals

CAT's primary LEP goals are as follows:

- Comply with federal regulations to "Improve access to services for persons with limited English proficiency" by providing meaningful access to the benefits, services, information, and other important aspects of CAT programs and activities for individuals with limited English proficiency.
- Develop materials, conduct outreach, and distribute information designed to educate both community leaders who serve Spanish speaking LEP populations and LEP community members about CAT services and programs.
- Work with City staff and the contracted transportation service provider to ensure there is sufficient training for all employees regarding LEP programs and policies.

CAT will use the Department of Transportation four factor LEP analysis which considers the following; 1.) The number or proportion of LEP persons eligible in the City of Canby Urban Growth Boundary (CAT service area) who may be served or likely to encounter a CAT program, activity, or service; 2.) The frequency with which LEP individuals come into contact with CAT services; 3.) The nature and importance of the program, activity or service provide by CAT to the LEP population; and 4.) The resources available to the City/CAT and overall cost to provide LEP assistance. A brief description of these considerations is provided in below.

Four Factor Analysis

1) The number or proportion of LEP persons eligible in the CAT service area who may be served or likely to encounter a CAT program, activity, or service.

According to US Census Bureau population estimates (July 1, 2017) data the population of the City of Canby is 17,759. The US Census Bureau and the *2012-16 American Community Survey 5-year Estimates* show the population of Canby is ²approximately 20.1 percent Hispanic or Latino. In the City of Canby, all other races and ethnicities comprise less than 3 percent of the total population. The *American Community Survey* also estimates that 16.7 percent of Canby residents speak Spanish at home. The CAT service area³ estimated population is 18,712 and approximately 18 percent are Hispanic or Latino. Census data indicates the highest concentration of Latino residents live within the urban growth boundary and within Canby city limits. CAT does not count the number of LEP customers who use CAT services.

2) The frequency with which LEP individuals come in contact with a CAT program, activity, or service.

Considering twenty percent of Canby residents are Latino, it is obvious they come in contact with CAT services. CAT has anecdotal evidence of serving LEP individuals yet there is limited hard data collected. Currently, CAT has information about the frequency with which LEP individuals come in contact with CAT services based on the requests for interpretation services.

In fiscal year 2017-18 CAT received eight calls utilizing Certified Languages International for a total of 35 minutes of over the phone interpretation, averaging 7 minutes per call; and employed an interpreter for simultaneous Spanish interpretation at public meetings on 4 occasions; and paid for written translation for 15 documents of varying length. Since the last Title VI Plan update there have been no requests for document translation.

We also received 46 Spanish surveys for our Transit Master plan and 30 surveys for the Transit Master Plan Phase 2 prioritization. During fiscal year 2017-18 we processed 5 new Spanish ADA Paratransit Applications and 2 Spanish ADA re-certifications.

CAT will continue to assess the frequency at which drivers and customer service employees have or could possibly have contact with LEP persons. This includes documenting phone inquiries and verbally surveying CAT drivers.

² See *Appendix E, F, G, and H* for additional details.

³ There is not a perfect fit between Canby Urban Growth, and Canby Service Area and U.S. Census Tracts. For the purposes of this plan the census tract data is compiled from census tracts 229.01, 229.04, 229.05, 229.06, and 229.07. Tracts 229.04 and 229.07 are entirely within the UGA, all of the most populated parts of 229.05 and 229.06 are in the UGA, and tract 229.01 is split between the UGA and more rural areas to the east of the city. See *Appendix F & J*.

3) The nature and importance of the program, activity, or service provided by CAT to the LEP community.

CAT understands that transportation is critically important to the daily lives of our community members. Certain aspects of our services and this plan will be used to meet the needs of the LEP community. These include services such as: construction projects; property acquisitions; and service area or level changes.

4) The resources available to CAT and costs.

CAT contracts with four translation or interpretation services;

- 1.) Certified Languages International to provide verbal interpretation in any language to callers requesting information about CAT services.
- 2.) Passport to Languages to provide written translation services when customers or the public request documents in other languages.
- 3.) Immigrant & Refugee Community Organization (IRCO) to provide simultaneous interpretation for public meetings.
- 4.) MultiCultural Collaborative to provide simultaneous interpretation for public meetings or written translation services when customers or the public request documents in other languages.

In addition to the contracted services the City has identified in-house staff with other language abilities and these staff have some availability to assist with requests related to all CAT services. The CAT Route 99X schedule, the General Public Dial-A-Ride brochure, Paratransit Application, paratransit service user guide, and shopping shuttle flier are available in Spanish. All service related information on the website is also in Spanish. Press releases, TAC agendas, notices and rider alerts are typically produced in English and Spanish. Larger documents and plans are available in other languages or formats upon request.

Translating large planning documents can be a budget issue. Documents of 20 pages or more may cost in excess of \$500 to be translated. In Fiscal Year 2018 CAT's annual cost for translation and interpretation services was under \$1,400. Also in Fiscal Year 2018, CAT made a one-time purchase of audio equipment to facilitate simultaneous interpretation (\$3,424.99). The equipment purchased will facilitate simultaneous interpretation of one language and accommodate up to 10 individual listeners at one time. It can also be expanded to add more than one language at a time and/or more listening units to accommodate more listeners. The equipment was purchased to facilitate the Transit Master Planning process and has already been used on several occasions for other outreach efforts. Going forward this equipment will certainly enhance CAT's communication with the LEP populations.

Implementation Methods

1) How to Identify an LEP Person who Needs Language Assistance

These methods may be used to help identify persons who may need language assistance:

- Continually monitor Certified Languages International, Passport to Languages requests submitted through CAT dispatchers and office staff.
- Examine records requests for language assistance from past meetings and events to anticipate the possible need for assistance at upcoming meetings;
- Continue to utilize the simultaneous interpretation equipment and interpretation services for appropriate public meetings and keep track of how many people use the interpretation equipment.
- When public meetings are held, have a staff member greet and briefly speak to each attendee. To informally gauge the attendee's ability to speak and understand English, asking questions that require a full sentence reply;
- Provide Certified International cards at public meetings. While staff may not be able to provide translation assistance at this meeting, the cards will be used to identify language needs for future meetings; and
- Regularly survey CAT drivers and other first line staff of any direct or indirect contact with LEP individuals.

2) Language Assistance Measures

CAT has implemented the following LEP procedures:

- CAT has contracts with Certified Languages International, Passport to Languages, IRCO, and MultiCultural Collaborative to provide ad hoc verbal, written, and in person interpretation services upon request and as needed.
- Service information, Rider Alerts, TAC Agendas, and notices on the buses and at the Transit Center are all provided in Spanish and available in other languages and formats upon request.
- Large documents, payroll tax information, and other documents are published in English and are available in other languages and formats upon request.
- CAT's phone system includes options for Spanish speaking customers.
- CAT provides Spanish speaking interpreters at public meetings and events and offers this service upon request for any public meeting.
- CAT has developed and maintains a comprehensive contact list ⁴of organizations, schools, churches, non-profits, apartment complexes and other stakeholders who work with or serve LEP populations.

⁴ Refer to Appendix I

3) Training – City/CAT Employees and Contracted Personnel

CAT will provide employee training for City employed transit staff and provide information to the Transportation Service Provider so contract staff may be trained on all aspects of the Title VI and LEP. Prior to public meetings at which LEP individuals are anticipated to attend, staff will review the Title VI Plan, including this LEP section.

CAT will ensure the Transportation Service Provider management and employees are familiar with specific procedures to be followed when serving an LEP customer, including how to handle a potential Title VI/LEP complaint.

It is a priority for CAT management to recruit and hire bilingual and or bicultural individuals. CAT management encourages and supports the transportation service provider to conduct recruitment activities such as:

- Attend job fairs targeting the Latino/Hispanic population.
- Place job announcements in local newspapers, on CAT website, in e-mail notifications, and any other medium used to attract potential employees, with a note encouraging bilingual (English/Spanish)/bicultural individuals to apply.
- Place job announcements in appropriate local publications targeting Spanish-speaking residents.

CAT will continue to work with the Canby School District, the City's Spanish speaking Librarian and the non-profit *Bridging Cultures* to provide input on potential training and outreach opportunities to improve CAT's ability to reach and engage Latino community members.

4) Outreach

General Strategy

This program will utilize existing networks⁵ within the Spanish-speaking community to contact, engage, and educate community leaders serving Spanish-speaking LEP populations and LEP community members about CAT services and programs.

CAT has developed a comprehensive mailing list⁶ of a variety of organizations, churches, schools, apartment complexes, and media outlets etc. that work with or serve the Latino population. CAT will refer to this mailing list to conduct outreach to the Latino community. Specific outreach efforts will vary depending on the project, proposal or activity. Some or all of the following methods may be used:

⁵ Community-based organizations (CBOs), churches, school district, social clubs, non-profits, business organizations and state, county, and city social service agencies.

⁶ Refer to *Appendix I* for additional information

- Flyers and/or brochures will be made available through local churches, social service agencies, ethnic retail outlets, the school district office and possibly specific schools within the Canby School District, Clackamas Community College, City Hall, the library, apartment complexes with high concentration of LEP populations.
- Other printed materials, such as transit schedules and maps, will be translated and made available on CAT vehicles and at select outlets.
- Paid advertisements and the CAT website will indicate ways in which LEP persons can access information about our services.
- If staff knows that they will be presenting a topic that could be of importance to an LEP individual or if staff will be hosting a meeting or a workshop in a geographic location with a known concentration of LEP persons, meeting notices, fliers, advertisements, and agendas will be printed in an alternative language, based on known LEP population in the area.

Stakeholders

Internal: CAT management, Transit Advisory Committee and City Council; Transportation Service Provider management and staff; and CAT contractors needing to communicate with the Spanish speaking LEP community regarding legal, service, and ridership issues.

External: Spanish-speaking LEP communities; community-based organizations (CBOs) serving Spanish-speaking LEP populations; Canby School District; State, County, and City governments serving Spanish-speaking LEP populations; and Hispanic business groups;

External Stakeholders:

- Hispanic business associations
- State, county, and city governments, 211

Community Based Organizations

- Canby Center
- Bridging Cultures

Apartments

- Casa Verde Apartments
- Greenbriar Apartments
- The Orchards Apartments
- Township Apartments

Schools

- Canby School District
- Canby School District/REACH
- Head Start: Mulino
- Head Start: Barlow
- Ackerman Center

Schools (continued)

- Canby Union High School
- Baker Prairie Middle School
- Lee Elementary School
- Knight Elementary School
- Eccles Elementary School
- Clackamas Community College

Churches

- Saint Patrick's Catholic Church
- Iglesia Del Dios Vivo Columna Y apoyo De La Verdad
- Canby Hispanic Foursquare

Media

- La Pantera Radio 940AM
- El Hispanic News
- Univision Portland

Translation and Interpretation Services

- Passport to Languages –written translation
- Certified Languages International –phone translation
- IRCO –simultaneous interpretation
- MultiCultural Collaborative –simultaneous interpretation
- Phone System- Spanish Options

Monitoring and 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, and it will be important to monitor changes in demographics and types of services. CAT will update the LEP as required by the U.S. DOT. At a minimum, the plan will be reviewed and updated when it is clear that higher concentrations of LEP individuals are present in CAT's service area.

Dissemination of the Limited English Proficiency Plan

CAT will post the LEP Plan on its website at www.canbyareatransit.org. Copies of the plan will be provided to any person or agency requesting a copy. LEP persons may obtain copies/translations of the plan upon request.

Any questions or comments regarding this plan should be directed to:

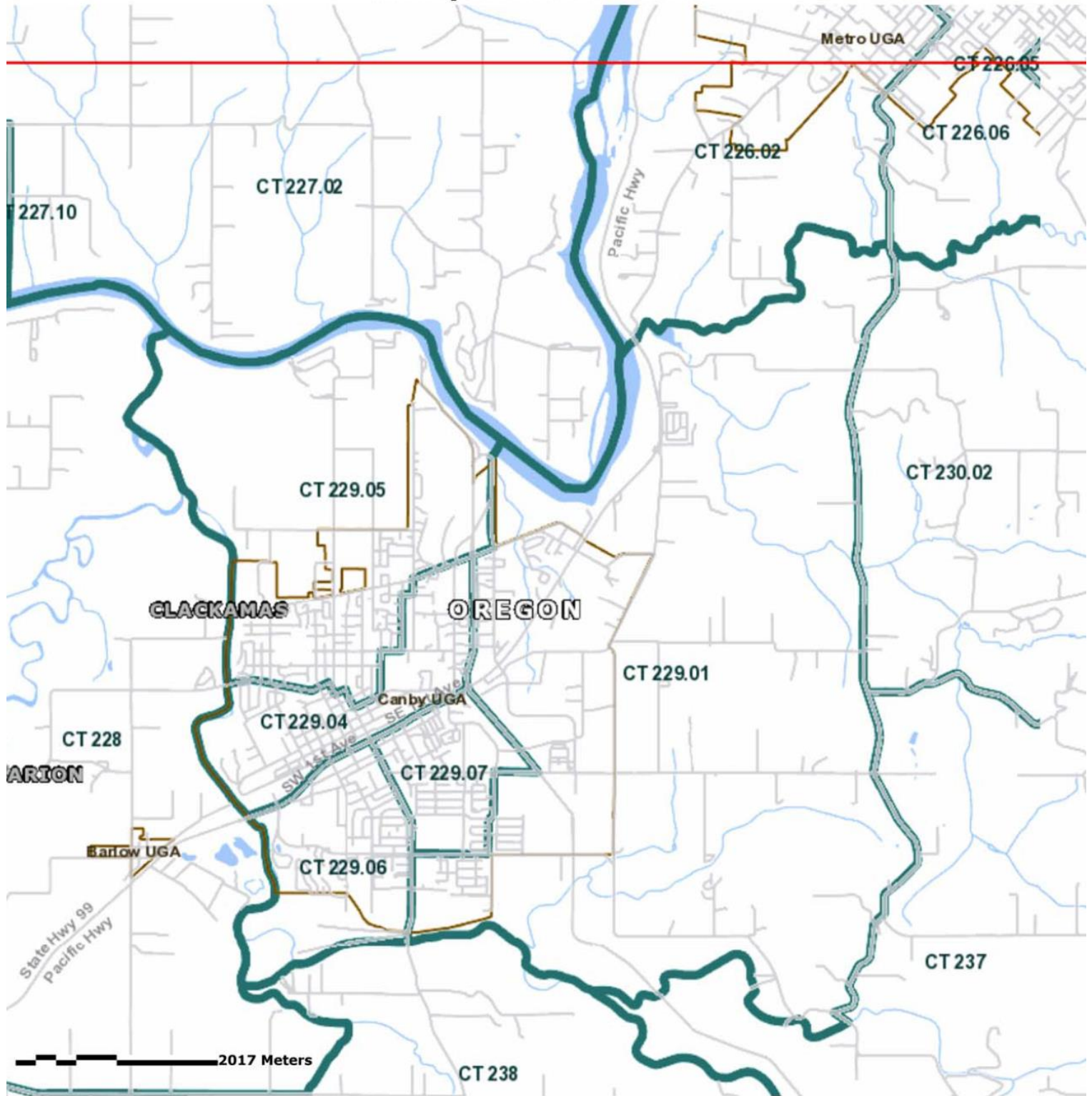
Julie Wehling
CAT Transit Director
Canby Area Transit
P.O. Box 930
Canby, Oregon 97013
503-266-0751

Appendix I: Limited English Proficiency Contact List

Organization/Location	Contact Person	Title	phone	email
Bridging Cultures	Detail removed to protect privacy	Detail removed to protect privacy	Detail removed to protect privacy	Detail removed to protect privacy
Bridging Cultures				
Bridging Cultures Concilio				
Canby Center				
Canby Public Library				
Clackamas Community College				
Media				
La Pantera Radio 940AM				
El Hispanic News				
El Hispanic News				
Univision Portland				
Univision Portland				
Appartments & Neighborhoods				
Casa Verde Apartments				
Greenbriar Apartments				
Hope Village				
Northeast Neighborhood Asso.				
Riverside Neighborhood Asso.				
Southeast Neighborhood Asso.				
Southwest Neighborhood Asso.				
The Orchards Apartments				
Township Apartments				
Schools				
Canby School District				
Canby School District				
Canby School District/REACH				
Canby School District/REACH				
Head Start: Mulino				
Head Start: Barlow				
Trost School				
Ackerman Center				
Canby Union High School				
Canby Union High School				
Baker Prairie Middle School				
Lee Elementary School				
Knight Elementary School				
Eccles Elementary School				
Churches				
Saint Patrick's Catholic Church				
Saint Patrick's Catholic Church				
Iglesia Del Dios Vivo Columna Y apoyo De La Verdad				
Canby Cares				
Canby Cares				
Canby Hispanic Foursquare				

Appendix J: Census Tract Map

Canby UGA and Tracts



Legend

- | | | | |
|----------|--------------------|--------------------|----------|
| States | Urban Growth Areas | Linear Hydrography | Glaciers |
| Counties | Census Tracts | Areal Hydrography | |