

RESOLUTION NO. 2024-01

A RESOLUTION OF THE OKANOGAN COUNTY TRANSIT AUTHORITY APPROVING AND ADOPTING THE REVISED OKANOGAN COUNTY TRANSIT AUTHORITY TITLE VI POLICY TITLE VI PLAN FOR THE FEDERAL TRANSIT ADMINISTRATION TITLE VI COMPLAINT PROCEDURES.

WHEREAS, the staff of Okanogan County Transit Authority ("OCTA") have revised OCTA's Title VI Policy and Title VI Plan which guide OCTA in its administration and management of Title VI related activities; and

WHEREAS, the OCTA Board of Directors have reviewed the revised Okanogan County Transit Authority Title VI Policy Title VI Plan for the Federal Transit Administration Title VI Complaint Procedures and are desirous of adopting such revised version to guide OCTA in its administration and management of Title VI related activities.

NOW, THEREFORE, be it resolved by the Board of Directors of OCTA as follows:

Section 1 - Approval. The Board of Directors of OCTA does hereby approve the revised Okanogan County Transit Authority Title VI Policy Title VI Plan for the Federal Transit Administration Title VI Complaint Procedures attached hereto and incorporated herein as though fully set forth.

Section 2 - Effective Date. The implementation of the referenced Policy and Plan shall be effective as of the date of passage of this Resolution.

PASSED by the Board of Directors of OCTA at its regular meeting on January 17th, 2024.

APPROVED:

Attest:


Cindy Gagne, Chairperson

By:


Crystal Hawley, Clerk of the Board

APPROVED AS TO FORM:


W. Scott DeTro; OCTA Attorney

**OKANOGAN COUNTY TRANSIT AUTHORITY TITLE VI POLICY
TITLE VI PLAN FOR THE FEDERAL TRANSIT ADMINISTRATION
TITLE VI COMPLAINT PROCEDURES**

What is Title VI of the Civil Rights Act of 1964?

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the base of race, color, or national origin in programs and activities receiving Federal financial assistance. This policy was developed to guide the Okanogan County Transit Authority in its administration and management of Title VI related activities.

Okanogan County Transit Authority is committed to ensuring that no person is excluded from participation in or denied benefits of its transit services on the basis of race, color, or national origin, and is protected by Title VI Federal Transit Administration (FTA) Circular 4702.1.A. If you believe you have been subjected to discrimination under Title VI, you may file a complaint.

How to File a Title VI Complaint?

You may file a signed, written complaint no later than one hundred and eighty (180) days from the date of the alleged discrimination. The complaint should include the following information:

- Your name, mailing address, and how to contact you (i.e., telephone number and/or email address)
- How, when, where, and why you believe you were discriminated against. Include the location, names, and contact information of any witnesses
- Other information that you deem significant

For more information about your rights under Title VI and to file a complaint with the Okanogan County Transit Authority, contact the Title VI Coordinator at the following address:

Okanogan County Transit Authority
ATTN: Brent Timm, Title VI Coordinator
PO Box 507
Okanogan WA 98840
By Phone: (509) 557-6177
By Email: btimm@okanogantransit.com

Note: The Okanogan County Transit Authority encourage all complainants to certify all mail that is sent through the US Postal Service and/or ensure that all written correspondence can be tracked easily. For complaints originally submitted by facsimile, an original, signed copy of the complaint must be mailed to Brent Timm, as soon as possible after the event occurs or no later than 180 days of the act of discrimination.

What happens when I submit my complaint to the Okanogan County Transit Authority?

All complaints alleging discrimination based on race, color, or national origin in a service or benefit provided by the Okanogan County Transit Authority will be directly addressed by the Okanogan County Transit Authority. The Okanogan County Transit Authority shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. Additionally, the Okanogan County Transit Authority shall make every effort to address complaints in an expeditious and thorough manner.

In instances where additional information is needed for investigation of the complaint, the Okanogan County Transit Authority will contact the complainant in writing. Please note that in responding to any request for additional information, a complainant’s failure to provide the requested information will result in administrative closure of the complaint.

Once sufficient information for investigation from the complaint is received by the Okanogan County Transit Authority, a written response will be drafted subject to review by the transit’s attorney. If appropriate, the Okanogan County Transit Authority’s attorney may administratively close the complaint. In this case, the Okanogan County Transit Authority will notify the complainant of the action as soon as possible.

How will I be notified of the outcome of my complaint?

The Okanogan County Transit Authority will send a final written response to the complainant and advise the complainant of his or her right to 1) appeal within 7 calendar days of receipt of the final written decision from the Okanogan County Transit Authority, and/or 2) file a complaint externally with the U.S. Department of Transportation and/or the Federal Transit Administration. Every effort will be made to respond to Title VI complaints within 60 working days of receipt of such complaint, if not sooner.

In addition to the complaint process described above, a complainant may file a Title VI complaint with the following offices:

Office of Civil Rights
Federal Transit Administration
915 Second Avenue, Suite 3142
Seattle WA 98174
Phone: 206-220-7954
Fax: 206-220-7959

Director
FTA Office of Civil Rights
East Building, 5th Floor
1200 New Jersey Avenue, SE

RECORD OF TITLE VI INVESTIGATIONS, COMPLAINTS OR LAWSUITS

All complaints are tracked and retained by the Okanogan County Transit Authority in accordance with Washington State Department of Transportation (WSDOT) records retention requirements.

To date, there have been no Title VI investigations, complaints, or lawsuits against Okanogan County Transit Authority

Summary Complaints Table

Date Filed	Status	Summary	Action Taken
0	0	0	0

LIMITED ENGLISH PROFICIENCY (LEP PLAN)

The Okanogan County Transit Authority is committed to breaking down language barriers by implementing consistent standards of language assistance across its service area.

The United States is home to millions of national origin minority individuals who are LEP. That is, their primary language is not English, and they cannot speak, read, write, or understand the English language at a level that permits them to interact effectively with recipients of Federal financial assistance. Because the language differences and the inability to effectively speak or understand English, persons with LEP may be subjected to exclusion from programs or activities, experience delays, or denials of services. These individuals may be entitled to language assistance with respect to a particular type of service. The federal government and those receiving assistance from the federal government must take reasonable steps to ensure that LEP persons have meaningful access to the programs, services, and information those entities provide. This will require agencies to establish creative solutions to address the needs of this ever-growing population of individuals, for whom English is not their primary language.

Okanogan County meets the threshold of 5% or 1,000 people who are LEP, showing that the majority are Spanish speaking (15% of the population or 5,920 as of 2020).

OCTA will notify the public of language assistance through the rider’s guide, schedules, etc. in printed form as well as on website.

ANALYSIS OF FACTORS

In preparing the LEP Plan, the Okanogan County Transit Authority assumed the U.S. Department of Transportation four factor LEP analysis as follows:

Factor No. 1: The nature and importance of service provided by the Okanogan County Transit Authority. The Okanogan County Transit Authority provides important transit services to the public through its fixed route, paratransit, and vanpool programs and currently contracts limited service with Okanogan County Transportation and Nutrition.

Factor No. 2: The number or proportion of LEP persons in the service area. The vast majority of the population with which we do business (individuals wishing to ride transit) are proficient in English, so the LEP services are not normally required. According to the 2020 Limited English

Proficiency Map from LEP.gov, 15% of the population within Okanogan County are Spanish speaking.

Factor No. 3: The frequency with which LEP individuals come into contact with the service. All contacts with the Okanogan County Transit Authority can be made through its administrative office located in Okanogan. We serve LEP persons daily via our buses, contracted services, paratransit demand response services, and vanpool program. In an effort to serve LEP persons, the Okanogan County Transit Authority specifically recruits and employs staff proficient in Spanish.

Factor No. 4: The resources available to the recipient of the federal funds to assure meaningful access to the service by LEP persons. The Okanogan County Transit Authority currently employs Spanish speaking staff to support service to LEP citizens of Okanogan County. The Okanogan County Transit Authority will utilize the local Department of Social and Health Services (DSHS) office when an interpreter is needed for other languages. The Okanogan County Transit Authority provides publications available in print form as well as digital form on the agency website in both English and Spanish, including Rider's Guide and schedules; these documents assist in guiding persons to contact our office for language assistance.

Staff is trained to help assist LEP persons to help integrate language needs. All staff receive Customer Service training during staff orientation as well as refresher training provided throughout the year. Staff meetings and individual meetings are also held periodically to help all staff understand the importance of and resources available to the public for language assistance.

IMPLEMENTATION PLAN

The Okanogan County Transit Authority has fully implemented the LEP Plan, and it will be reviewed annually, and LEP data will be tracked to determine what steps are appropriate in following years. We identify LEP persons in the service area by ridership, telephone contact counts, neighborhood demographics, general awareness surveys and on-board surveys. The Okanogan County Transit Authority's Title VI Policy and a Complaint Form is available on our website.

Schedules are printed in both English and Spanish. ADA Paratransit Applications are available in both English and Spanish. Service changes are posted in buses and at the main office in English and Spanish.

Title VI information is posted in English and Spanish schedules.

In order to comply with 49 CFR 21.9(d), the Okanogan County Transit Authority and its sub-recipients must provide information to beneficiaries regarding their Title VI obligations and inform beneficiaries of the protections against discrimination afforded them by Title VI.

The Okanogan County Transit Authority has established a statement of rights and a policy statement.

NOTIFYING BENEFICIARIES OF THEIR RIGHTS UNDER TITLE VI

Our website will include our Title VI Policy and Complaint form and will be publicly displayed in the Okanogan County Transit Authority facility. The Okanogan County Transit Authority schedules reference Title VI rights and the process for complaints. The website will also state: The Okanogan County Transit Authority does not discriminate on the basis of race, color, or national origin. New employees shall be informed of the provisions of Title VI and this policy, and the Okanogan County Transit Authority's expectations to perform their duties accordingly.

A copy of the Okanogan County Transit Authority's Title VI Policy and Complaint Form will be available at our administration office located at 303 Second Avenue South, Okanogan, WA.

INCLUSIVE PUBLIC PARTICIPATION PLAN

Community outreach is a requirement of Title VI. The Okanogan County Transit Authority recipients and sub-recipients shall seek out and consider the viewpoints of minority and low-income populations while conducting public outreach. Okanogan County Transit Authority recipients have wide latitude to determine what specific measures are most appropriate and should make this determination based on the composition of the affected population, the public involvement process, and the resources of the Okanogan County Transit Authority. The Okanogan County Transit Authority will engage the public in its planning and decision-making processes, as well as its marketing and outreach activities and will include the Washington State Migrant Council, Opportunities Industrialization Council, agencies within Okanogan County serving Developmental Disabilities programs (Okanogan Behavioral Health Care, Northwest Center, Department of Social and Health Services) for input. The Okanogan County Transit Authority will give adequate notice of public participation activities, as well as early and continuous opportunities for public review and comment at key decision points.

Transit Development Plan (TDP). The TDP is a requirement of the Washington State Legislature. The plan is prepared by transit staff, approved by the Okanogan County Transit Authority Board of Directors, and submitted to WSDOT. This plan indicates the size of fleet, costs, revenues, service and revenue miles, expenses, and capital expenditures. A public hearing is held to obtain comments from the public on the TDP.

Board Meetings. The Okanogan County Transit Authority Board of Directors holds monthly meetings, and the public is invited to attend and provide comment.

Bilingual Outreach. The current Acting General Manager and Clerk of the Board of Directors of the Okanogan County Transit Authority are able to provide Spanish speaking guests with information on public transit services in Spanish at the administration office, over the phone, public meetings, and outreach events and activities. The Okanogan County Transit Authority provides interpreter/translation services when staff is not available.

Minority Representation on Committees. Okanogan County Transit Authority does not currently have non-elected committees but holds open public meetings one time per month and encourages anyone to attend to share comments with the Board of Directors.

SUMMARY OF OUTREACH EFFORTS

Okanogan CHI (Coalition for Health Improvement)
Okanogan FYRE (Foundation for Youth Resiliency and Engagement)
Worksource Okanogan
Okanogan County Housing Authority
Okanogan County Child Development Association (Head Start, Early Head Start, ECEAP, Rural Home Visiting)
Chambers of Commerce (various cities and town throughout Okanogan County)
City Councils (various cities and towns throughout Okanogan County)
Okanogan County Transportation and Nutrition
Family Health Centers
Okanogan Behavioral Health Care
Aging & Adult Care of Central Washington
Okanogan County Sheriff Department
Department of Corrections
North Valley Hospital
Mid Valley Hospital
Three Rivers Hospital
Wenatchee Valley College – North
Department of Social and Health Services (DSHS) – Omak
Developmental Disabilities Services (Okanogan Behavioral Health Care, Northwest Center, DSHS)
School Districts (various throughout Okanogan County)
Community Surveys (Produced in English/Spanish throughout Okanogan County)

CUSTOMER COMPLAINT PROCESS

A non-Title VI complainant may contact the Okanogan County Transit Authority to lodge a non-Title VI complaint or comment. All complaints/comments are put into a database, researched, followed-up on, and a response is made to the complainant. This process can be initiated by calling the Okanogan County Transit Authority at 509-557-6177, or by visiting the administrative office located at 303 Second Avenue South, Okanogan.

SERVICE STANDARDS

It is the goal of the Okanogan County Transit Authority to serve as many persons residing/visiting the service area as possible.

Vehicle load: In case of bus overload, OCTA will allow an additional 25% of seated capacity for standees, unless otherwise prohibited by law or regulation. This equates to a 1.25 vehicle load.

Vehicle Type Factor	Seated	Standing	Total	Max Load
<i>Cut-a-Way 20-person bus</i>	20	5	30	1.25
<i>Cut-a-Way 13-person bus</i>	13	3	16	1.25

Vehicle headway: The Okanogan County Transit Authority route headways do not exceed two hours between each scheduled route.

On-time performance: An Okanogan County Transit Authority vehicle is considered on-time if it departs a stop no more than one (1) minute before scheduled time and no more than five (5) minutes after scheduled departure time. The Okanogan County Transit Authority's on-time performance objective is 90% or above. Due to the distances traveled, inclement weather or other factors can play a large role in on-time performance which may decrease the objective. The Okanogan County Transit Authority monitors on-time performance using RouteMatch software and reports can be available for public review upon request.

Service availability: Okanogan County Transit Authority serves the main populous areas of the Okanogan Valley (between Oroville and Pateros), Methow Valley (between Winthrop and Pateros) and connects the two valleys over Loup Loup Pass (Highway 20). Fixed-route stops are not more than ¾ miles apart in the populous areas. The Okanogan County Transit Authority provides deviated ADA fixed route service, which includes ¾ mile adjacent to the fixed route service area. Designated bus stops are listed on schedules; riders may also flag the bus to stop in areas not officially designated as a stop if the bus can safely pull off the road and not impede traffic. Service expansion will be based on ridership demand.

SERVICE POLICIES

Vehicle assignments: All vehicle assignments are based on ridership and need. Okanogan County Transit Authority's goal is to utilize a fleet size that will remain efficient and effective in serving the population. The Okanogan County Transit Authority utilizes 20 passenger Cut-a-Way buses for the main routes and 13 passenger Cut-a-Way buses for lower ridership areas. Size of buses are based on ridership and demand.

Transit amenities: Transit amenities are based on the numbers of passenger boardings at stops and stations along routes and in conjunction with local jurisdictions and codes.