

OKANOGAN COUNTY TRANSPORTATION & NUTRITION

TITLE VI PLAN FOR THE FEDERAL TRANSIT ADMINISTRATION AND WASHINGTON STATE DEPARTMENT OF TRANSPORTATION

February 2023 – February 2026

Title VI Notice to Public

It is Okanogan County Transportation & Nutrition's (OCTN) policy to assure that no person shall, on the grounds of race, color, national origin, as provided by Title VI of the Civil Rights Act of 1964, be excluded from participation in, be denied the benefits of, or be otherwise discriminated against under any of its programs and activities. Any person who believes his/her Title VI protection has been violated, may file a complaint with Okanogan County Transportation and Nutrition. For additional information regarding Title VI complaint procedures and/or information regarding our non-discrimination obligations, please contact Okanogan County Transportation and Nutrition's Title VI Coordinator at transportation@octn.org or by calling 509-826-4391.

Americans with Disabilities Act (ADA) Information

This material can be made available in an alternate format by emailing Okanogan Transportation & Nutrition at transportation@octn.org or by calling 509-826-4391. Persons who are deaf or hard of hearing may make a request by calling the Washington State Relay at 711.

Notificación de Título VI al Público

La política de Okanogan County Transportation & Nutrition es garantizar que ninguna persona, por motivos de raza, color u origen nacional, según lo dispuesto en el Título VI de la Ley de Derechos Civiles de 1964, sea excluida de la participación, se le nieguen los beneficios o se le discrimine de otro modo en cualquiera de sus programas y actividades. Cualquier persona que considere que se ha violado su protección del Título VI puede presentar una queja ante Okanogan County Transportation and Nutrition. Para obtener más información sobre los procedimientos de queja del Título VI o información sobre nuestras obligaciones contra la discriminación, comuníquese con el coordinador del Título VI de Okanogan County Transportation and Nutrition a transportation@octn.org o al 509-826-4391.

Información de la Ley sobre Estadounidenses con Discapacidades (ADA, por sus siglas en inglés)

Este material puede estar disponible en un formato alternativo al enviar un correo electrónico a Okanogan County Transportation & Nutrition a transportation@octn.org o llamando al 509-826-4391. Personas sordas o con discapacidad auditiva pueden solicitar la misma información llamando al Washington State Relay al 711.

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Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color and national origin in programs and activities receiving Federal financial assistance.

Okanogan County Transportation & Nutrition (OCTN) is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.B

TITLE VI COMPLAINT PROCEDURES

Okanogan County Transportation & Nutrition (OCTN) is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.B 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 up to one hundred and eighty (180) days from the date you became aware of the incident. The complaint should include the following information:

- Your name, mailing address, and how to contact you (i.e., telephone number, email address, etc.)
- 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

A form is available at Okanogan County Transportation & Nutrition (OCTN) which may be completed for this purpose.

The complaint may also be filed in writing with Okanogan County Transportation & Nutrition (OCTN) at the following address:

Okanogan County Transportation & Nutrition (OCTN)
Executive Director
P.O. Box 471
Okanogan, WA 98840
By phone: 509-826-4391
By Facsimile: 509-826-4040
By email: transportation@octn.org

NOTE: Okanogan County Transportation & Nutrition (OCTN) encourages all complainants to certify all mail that is sent through the U.S. 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 the Title VI Coordinator as soon as possible, but no later than 180 days from the date the complainant became aware of the incident.

What happens to your complaint after it is submitted to Okanogan County Transportation & Nutrition?

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

In instances where additional information is needed for investigation of the complaint, Okanogan County Transportation & Nutrition will contact the complainant in writing. Please note that in responding to any requests for additional information, a complainant's failure to provide the requested information may result in the administrative closure of the complaint.

Once sufficient information for investigating the complaint is received by Okanogan County Transportation & Nutrition, a written response will be drafted subject to review by Okanogan County Transportation & Nutrition's attorney. If appropriate, Okanogan County Transportation & Nutrition's attorney may administratively close the complaint. In this case, Okanogan County Transportation & Nutrition will notify the complainant of the action as soon as possible.

How you will be notified of the outcome of your complaint?

Okanogan County Transportation & Nutrition 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 Okanogan County Transportation & Nutrition, 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 complaints, if not sooner.

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

Washington State Department of Transportation (WSDOT)
Public Transportation Division
Attn: Title VI Coordinator
P.O. Box 47387
Olympia, WA 98504-7387

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

US Department of Justice
Civil Rights Division
Coordination and Review Section - NWB
950 Pennsylvania Avenue, NW
Washington, DC 20530

**RECORD OF TITLE VI INVESTIGATIONS,
COMPLAINTS OR LAWSUITS**

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

To date, there has been one lawsuit in 2005 alleging discrimination from a former employee but the lawsuit was dismissed in 2008 on the granting of the summary judgment motion filed and argued by Okanogan County Transportation & Nutrition’s attorney.

Summary Complaints Table

Date	Status	Summary	Action Taken
2005	Dismissed	Lawsuit alleging discrimination from a former employee.	Lawsuit dismissed in 2008 on the granting of the summary judgment motion filed and argued by Okanogan County Transportation & Nutrition’s attorney.

LIMITED ENGLISH PROFICIENCY (LEP) PLAN

Okanogan County Transportation & Nutrition is committed to breaking down language barriers by implementing consistent standards of language assistance across its service area.

Census. The United States is home to millions of national origin minority individuals who are Limited English Proficiency (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 of language differences and the inability to effectively speak or understand English, persons with LEP may be subject 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.

LEP.gov data shows that Okanogan County, with a population estimate of 38,355, 7.5% of the total population (3107 persons) identified themselves as Spanish speaking. This language group is greater than the 5% threshold of the population to be served.

OCTN 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

Factor No. 1: The number or proportion of LEP persons in the service area.

Okanogan County Transportation & Nutrition's jurisdiction covers Okanogan County which is largely English speaking. The vast majority of the population in Okanogan County (individuals wishing to ride transit) is proficient in English so that LEP services are not normally required. According to the 2015 Limited English Proficiency Map from LEP.gov Only 7.5 % of the population of Okanogan County do not speak English.

Factor No. 2. The frequency with which LEP individuals come into contact with the service.

All contacts with the Okanogan County Transportation & Nutrition (OCTN) can be made through its administrative office located in Okanogan. We serve LEP persons daily via our buses, contracted services, paratransit demand response services program. In an effort to serve LEP persons, the Okanogan County Transportation & Nutrition (OCTN) specifically recruits and employs staff proficient in Spanish.

Factor No. 3: The nature and importance of service provided by Okanogan County Transportation & Nutrition (OCTN).

Okanogan County Transportation & Nutrition (OCTN) provides important transit services to the public through demand response, door-to-door, commuter, and employment transportation services.

Factor No. 4. The resources available to the recipient of the federal funds to assure meaningful access to the service by LEP persons.

Okanogan County Transportation & Nutrition’s current in-house language capability is English. Okanogan County Transportation & Nutrition does not currently employ fluent Spanish speaking staff to support service to LEP citizens of Okanogan County. The Okanogan County Transit Authority provides an interpreter when fluency is required. Okanogan County Transportation & Nutrition will utilize the local Department of Social and Health Services (DSHS) office when an interpreter is needed for other languages. Okanogan County Transportation & Nutrition 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

Okanogan County Transportation & Nutrition has implemented its plan and will review it annually, including any contacts with the LEP persons to determine the frequency of contacts, the language used, and how the contacts were handled. We identify LEP persons in the service area by ridership, telephone contact, demographics and surveys. Staff members who are bilingual are always asked to help with Spanish speaking customers.

Schedules and fares are printed in both English and Spanish. Okanogan County Transportation & Nutrition’s Title VI policy and a Complaint form are available on our website. All schedules contain Title VI language.

In order to comply with 49 CFR 21.9(d), Okanogan County Transportation & Nutrition 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. Okanogan County Transportation & Nutrition has established a statement of rights and a policy statement.

NOTIFYING BENEFICIARIES OF THEIR RIGHTS UNDER TITLE VI

1. Our website includes our Title VI policy and complaint form. The site also states: *Okanogan County Transportation & Nutrition does not discriminate on the basis of race, color or national origin.*
Okanogan County Transportation & Nutrition no discrimina en base de raza, color o origen nacional.
2. Our Title VI policy and complaint form are posted at our Administration and Operations facility (located at 303 Second Avenue South, Okanogan, WA). Individuals who believe they have been discriminated against may request a complaint form from our drivers or from any staff member.

ANALYSIS OF CONSTRUCTION PROJECTS

Okanogan County Transportation & Nutrition has not had a construction project requiring an environmental assessment (EA) or environmental impact statement (EIS).

PUBLIC PARTICIPATION

Community Outreach is a requirement of Title VI. Recipients and sub-recipients shall seek out and consider the viewpoints of minority and low-income populations in the course of conducting public outreach. 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 Okanogan County Transportation & Nutrition.

The Okanogan County Transportation & Nutrition 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 Community Action Council, Aging & Adult Care PSA8 (East Wenatchee), Okanogan Behavioral Health Care, Okanogan County Senior Citizens Association, Department of Social and Health Services, and staff at Confluence Health for input.

The Okanogan County Transportation & Nutrition will give adequate notice of public participation activities, as well as early and continuous opportunities for public review and comment at key decision points.

Customer Complaint/Comment Process:

Citizens may call Okanogan County Transportation & Nutrition offices at 509-826-4391 to lodge a complaint or comment. Complaint/Comment forms are also available on our website and in the buses in English and Spanish. All complaints/comments are reviewed by the Director of Operations who researches the complaint and responds back to the citizen.

Surveys:

We conduct onboard rider and general awareness surveys where citizens can comment on the quality of service and make suggestions regarding current and future service.

Bilingual Outreach:

Brochures, Schedules and Fares are published and distributed to areas where Spanish speaking citizens gather or utilize services. Spanish translations of all schedules are located on our website, available at our office, on busses and at local businesses where Spanish speaking people gather.

Okanogan County Transportation & Nutrition does not have citizen advisory boards or non-elected planning type boards.

SUMMARY OF OUTREACH EFFORTS ACCOMPLISHED SINCE LAST TITLE VI UPDATE

- Participation in the 2022 Okanogan Council of Governments Human Services Transportation Plan update.
- Rider Surveys (Produced in English/Spanish throughout Okanogan County)
- Brochures and outreach to: North Central Washington Library, Family Health Centers, Okanogan Behavioral Health Care, Aging & Adult Care of Central Washington, Department of Social and Health Services (DSHS) - Omak, Developmental Disabilities Services (Okanogan Behavioral Health Care), staff at Confluence Health.
- Participation in monthly Okanogan Council of Governments meetings.
- In-person visits to local senior centers, luncheons.
- Coordinated with TranGO and Aging and Adult Care for assistance with translation services, literature and phone inquiries.

SERVICE STANDARDS

It is the goal of the Okanogan County Transportation & Nutrition to serve as many persons residing/visiting the service area as possible.

Vehicle load: In case of bus overload, OCTN 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 Seated Standing Total Max Load Factor Cut-a-Way
20-person bus 20 5 30 1.25 Cut-a-Way 13-person bus 13 3 16 1.25.

Vehicle headway: Okanogan County Transportation & Nutrition route headways connecting to the transit system do not exceed two hours between each scheduled route. Okanogan County Transportation & Nutrition route headways between Okanogan and Coulee Dam do not exceed eight hours between each scheduled route.

On-time performance: An Okanogan County Transportation & Nutrition 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 Transportation & Nutrition’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. Okanogan County Transportation & Nutrition monitors on-time performance using RouteMatch software and reports can be available for public review upon request.

Service availability: Okanogan County Transportation & Nutrition serves the main populous areas at the north end of Okanogan county (between Oroville and Tonasket), the south end (Okanogan to Pateros) and east from Okanogan to Coulee Dam, which operates within Colville Confederated Tribes reservation. 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.

Okanogan Transportation & Nutrition’s door-to-door service operates within a 5-mile radius of the senior centers in Brewster, Omak, Okanogan, Oroville, Tonasket, and Twisp, and further upon request.

SERVICE POLICIES

Vehicle assignments: All vehicle assignments are based on ridership and need. Okanogan County Transportation and Nutrition’s goal is to utilize a fleet size that will remain efficient and effective in serving the population. The Okanogan County Transportation & Nutrition utilizes 20 passenger Cut-a-Way buses for the North Okanogan and Okanogan-Coulee Dam routes, and 14 and 9 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.

Attachment A

Okanogan County Transportation & Nutrition Title VI Non-Discrimination Policy Statement

Okanogan County Transportation & Nutrition is committed to ensuring that no person is excluded from participation in, or denied the benefits of, or be subject to discrimination in the receipt of its services or programs on the basis of race, color or national origin or any other characteristics protected by law, including Title I of the Civil Rights Act of 1964, as amended. Further, under the Americans with Disabilities Act (ADA) of 1990, no entity shall discriminate against an individual with a physical or mental disability in connection with the provision of transportation service.

To obtain more information on Okanogan County Transportation & Nutrition's nondiscrimination obligations or to file a Title VI complaint, contact Okanogan County Transportation & Nutrition at:

Executive Director
303 Second Avenue South
Okanogan, WA 98840

email: transportation@octn.org
phone: 509-826-4391
fax: 509-826-4040

You may file a written complaint no later than 180 days after the date that you became aware of the incident.

Information on non-English alternative formats may be obtained at the office of Okanogan County Transportation & Nutrition, 303 Second Avenue South., Okanogan, WA.

Jennifer Fitzthum
Executive Director

Attachment B

Title VI Complaint Form

Title VI of the 1964 Civil Rights Act requires that “No person in the United States 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 receiving federal financial assistance.” If you feel you have been discriminated against in transit services, please provide the following information in order to assist us in processing your complaint and send it to:

Okanogan County Transportation & Nutrition
Executive Director
P.O. Box 471
Okanogan, WA 98840
509-826-4391
509-826-4040 (fax)
transportation@octn.org

Please print clearly:

Name: _____

Mailing Address: _____

City, State, Zip Code: _____

Telephone Number: home: _____ cell: _____ message: _____

Person discriminated against: _____

Address of person discriminated against: _____

City, State, Zip Code: _____

Please indicate why you believe the discrimination occurred:

_____ Race or color

_____ National origin

_____ Income

_____ Other

What was the date of the alleged discrimination? _____
Where did the alleged discrimination take place? _____

Please describe the circumstances as you saw it: _____

Please list any and all witnesses' names and phone numbers:

_____	_____
_____	_____
_____	_____
_____	_____

What type of corrective action would you like to see taken?

Please attach any documents you have which support the allegation. Then date and sign this form and send to the Executive Director at the address listed on page 1 of this document.

Your signature

Date

Print your name

Attachment C

Title VI Notification of 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 basis of race, color and national origin in programs and activities receiving Federal financial assistance.

Okanogan County Transportation is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transportation services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.B 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 up to one hundred and eighty (180) days from the date you became aware of the incident. The complaint should include the following information:

- Your name, mailing address, and how to contact you (i.e., telephone number, email address, etc.).
- 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.

The complaint may be filed in writing with Okanogan County Transportation & Nutrition at the following address:

Okanogan County Transportation & Nutrition
Executive Director
P.O. Box 471
Okanogan, WA 98840
By phone: 509-826-4391 or 800-635-4391
By fax: 509-826-4040
By email: transportation@octn.org

NOTE: Okanogan County Transportation & Nutrition encourages all complainants to certify all mail that is sent through the U.S. Postal Service and/or ensure that all written correspondence can be tracked easily. For complaints originally submitted by fax, an original, signed copy of the complaint must be mailed to the Executive Director as soon as possible, but no later than 180 days from the alleged date of discrimination. Please use this address to request additional information about Title VI.

What happens to my complaint after it is submitted to Okanogan County Transportation & Nutrition?

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

In instances where additional information is needed for investigation of the complaint, Okanogan County Transportation & Nutrition will contact the complainant in writing. Please note that in responding to any requests for additional information, a complainant's failure to provide the requested information may result in the administrative closure of the complaint.

Once sufficient information for investigating the complaint is received by Okanogan County Transportation & Nutrition, a written response will be drafted subject to review by the company's attorney. If appropriate, Okanogan County Transportation & Nutrition's attorney may administratively close the complaint. In this case, Okanogan County Transportation & Nutrition will notify the complainant of the action as soon as possible.

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

Okanogan County Transportation & Nutrition 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 Okanogan County Transportation & Nutrition, 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 complaints, if not sooner.

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

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Public Transportation Division
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P.O. Box 47387
Olympia, WA 98504-7387

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

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