

TITLE VI PROGRAM

LANE COUNCIL OF GOVERNMENTS' TRANSPORTATION PROGRAM "LINK LANE" 2024-2026

Link Lane Transportation Program Title VI Coordinator
c/o Lane Council of Governments
859 Willamette St. Suite 500
Eugene OR 97402

Email: kwilson@lcog.org

Phone: 541-682-4422

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Table of Contents

1. Title VI Notice to the Public.....	3
2. Title VI Complaint Procedures and Form.....	5
3. Title VI Investigations and Complaints.....	10
4. Public Participation Plan	11
5. Four Factor Analysis.....	14
6. LEP Language Assistance Plan	19
7. Advisory Committee Membership.....	202
8. Subrecipient Oversight for Title VI.....	212
9. Title VI Equity Analysis Information	223
10. Vital Documents in Spanish.....	234
11. Título VI Aviso al Público	Error! Bookmark not defined. 4

1. Title VI Notice to the Public

Link Lane Transportation Program

Title VI Notice to the Public

The Link Lane Transportation Program, a division of the Lane Council of Governments (LCOG), gives public notice of its policy to uphold and assure full compliance with the non-discrimination requirements of Title VI of the Civil Rights Act of 1964 and related Nondiscrimination authorities. Link Lane Transportation Program operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act.

Any person who desires more information regarding the Title VI Program can contact its Title VI Program Coordinator with the Office of Civil Rights - at the address noted below.

Any person who believes they have, individually or as a member of any specific class of persons, been subjected to discrimination on the basis of race, color, or national origin has the right to file a formal complaint. Any such complaint must be in writing and submitted within 180 days following the date of the alleged occurrence to:

Link Lane Transportation Program Title VI Coordinator
c/o Lane Council of Governments
859 Willamette St. Suite 500
Eugene OR 97402

Email: kwilson@lcog.org

Phone: 541-682-4422

Facsimile: 541-682-4099

A Spanish version and a combined English/Spanish version of this document are located in Section 10, Vital Documents in Spanish.

The foregoing Title VI Notice (or its combined English/Spanish counterpart) is available to the public in the following locations:

- On Link Lane's website: link-lane.org
- In Lane Council of Governments Office

2. Title VI Complaint Procedures and Form

Introduction

The complaint procedures outlined herein apply to the Link Lane Transportation Program and other primary recipients and sub-recipients of Federal financial assistance. These procedures cover discrimination complaints filed under Title VI of the Civil Rights Act of 1964, Civil Rights Restoration Act of 1987, Section 504 of the Rehabilitation Act of 1973, and other non-discrimination authorities relating to any program, services, or activities administered by the Link Lane Transportation Program and its consultants and contractors.

The Link Lane Transportation Program will make every effort to obtain early resolution of complaints at the lowest level possible. Complaints of alleged discrimination will be investigated by the appropriate authority. The option of informal mediation meeting(s) between the affected parties and the Link Lane Transportation Program Title VI Coordinator may be utilized for resolution. Upon completion of each investigation, the Link Lane Transportation Title VI Coordinator will inform every complainant of all avenues of appeal.

The purpose of these discrimination complaint procedures is to describe the process used by the Link Lane Rural Program for processing complaints under Title VI of the Civil Rights Act of 1964, related statutes and authorities.

Complaint Procedure

1. Any person who believes he or she, individually, as a member of any specific class, or in connection with any disadvantaged business enterprise, has been subjected to discrimination prohibited by Title VI of the Civil Rights Act of 1964, the American with Disabilities Act of 1990, Section 504 of the Vocational Rehabilitation Act of 1973, or the Civil Rights Restoration Act of 1987, as amended, may file a complaint with the Link Lane Transportation Program. A complaint may also be filed by a representative on behalf of such a person. All complaints will be referred to the Link Lane Transportation/Title VI Coordinator for review and action.
2. In order to have the complaint considered under this procedure, the complainant must file the complaint no later than 180 days after:
 - a) The date of alleged act of discrimination; or
 - b) Where there has been a continuing course of conduct, the date on which that conduct was discontinued.

In either case, the Link Lane Transportation Program may extend the time for filing or waive the time limit in the interest of justice, as long as the Link Lane Transportation Program specifies in writing the reason for so doing.

3. Complaints shall be in writing and shall be signed by the complainant and/or the complainant's representative. If the Complainant is unable to reduce the complaint to writing, please contact the Title VI Coordinator using the information below, and a staff member will help dictate the complaint or provide other necessary assistance. Complaints shall set forth as fully as possible the facts and circumstances surrounding the alleged discrimination. In the event a person makes a verbal complaint of discrimination to the Link Lane Transportation Program Title VI Coordinator, the Coordinator will assist, if necessary, the person in transcribing the complaint into written form. The signed written complaint shall then be handled according to Link Lane Transportation Program's investigative procedures.
4. Complaints may be submitted to Kate Wilson, the Link Lane Transportation Program Title VI Coordinator via the following:

Link Lane Transportation Program Title VI Coordinator
c/o Lane Council of Governments
859 Willamette Street Suite 500
Eugene, OR 97402
Email: kwilson@lcog.org
Phone: 541-6824422
Facsimile: 541-682-4099

5. Within 15 days, the Link Lane Transportation Program Title VI Coordinator will acknowledge receipt of the allegation.
6. The Link Lane Transportation Coordinator Program Title VI Coordinator will conduct an investigation of the allegation and based on the information obtained. Any witnesses or parties to the investigation will be interviewed.
7. Within 90 days of receipt of the complaint, the Link Lane Transportation Program Title VI Coordinator will notify the complainant in writing of the final decision reached, including the proposed disposition of the matter. The notification includes specific reasons for the decision made and will advise the complainant of their appeal rights if they are dissatisfied with the final decision rendered by the Link Lane Transportation Program Title VI Coordinator.
8. The Link Lane Transportation Program Title VI Coordinator will also provide the LCOG Board of Directors with a copy of this decision and summary of findings upon completion of the investigation.
9. If the complainant wishes to appeal the decision, they may simply inform the Title VI Coordinator (via writing, phone, or email), and further information on the appeals process will be forwarded.
10. The complainant may also choose to file their complaint to either of the following:

Mail: Oregon Department of Transportation
Office of Civil Rights

Oregon Department of Transportation
Attn. Title VI Officer
955 Center St. NE, Suite 471
Salem, Oregon 97301

Phone: 503-986-4350

Facsimile: 503-986-6382

Or:

Federal Transit Administration, Office of Civil Rights

Mail: Attention: Title VI Program Coordinator

East Building, 5th Floor – TCR

1200 New Jersey Avenue SE

Washington, DC 20590

[Complaint Form](#)

**Link Lane Transportation Program
 Combined Civil Rights Complaint Form for
 Title VI and ADA**

Section I:		
Name:		
Address:		
Telephone (Home):	Telephone (Work):	
Electronic Mail Address:		
Accessible Format Requirements?	<input type="checkbox"/> Large Print	<input type="checkbox"/> Audio Tape
	<input type="checkbox"/> TDD	<input type="checkbox"/> Other
Section II:		
Are you filing this complaint on your own behalf?	<input type="checkbox"/> Yes*	<input type="checkbox"/> No
<i>*If you answered "yes" to this question, go to Section III.</i>		
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.	<input type="checkbox"/> Yes	<input type="checkbox"/> 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"/> 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 persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names 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 Discrimination Complaint with this agency?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, please provide any reference information regarding your previous complaint.		

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:	
<input type="checkbox"/> Federal Agency: _____	<input type="checkbox"/> State Agency: _____
<input type="checkbox"/> Federal Court: _____	<input type="checkbox"/> Local Agency: _____
<input type="checkbox"/> State Court: _____	
Please provide information about a contact person at the agency/court where the complaint was filed.	
Name:	
Title:	
Agency:	
Address:	
Telephone:	
Section VI:	
Name of agency complaint is against:	
Name of person complaint is against:	
Title:	
Location:	
Telephone Number (if available):	

You may attach any written materials or other information that you think is relevant to your complaint. Signature and date are required below.

Signature

Date

Please forward your Complaint to the following:

Link Lane Transportation Program
 Title VI Coordinator, c/o Lane Council of Governments
 859 Willamette Street, Suite 500
 Eugene, OR 97401
 (541) 682-4422

3. Title VI Investigations and Complaints

There are currently no complaints, investigations, or lawsuits related to Title VI for Link Lane Transportation Program. There have been no such complaints, investigations, or lawsuits in recent memory.

In the future event of a complaint or lawsuit being filed within the Transit Program, a log will be maintained to include the following information (as required by FTA C 4702.1B): date the complaint/lawsuit was filed, a summary of the allegation(s), status of the investigation, and actions taken by Link Lane in response to the complaint, lawsuit, or investigation. In addition to the required information, Link Lane will also collect the same information for any Title VI Complaint filed against any subrecipient or transportation provider of the agency.

4. Public Participation Plan

Public involvement provides an important opportunity to enhance the quality of transportation planning, programming and project implementation.

Consistent with federal rules and policies, the Oregon Transportation Plan includes the important policy “to involve Oregonians to the fullest practical extent in transportation planning and implementation in order to deliver a transportation system that meets the diverse needs of the state.”

Goal

The public involvement goal of the Link Lane Transportation Program is to promote public awareness, information, and education regarding transportation needs of Lane County residents and the services available to address them; and to increase public involvement by all resident of Lane County in planning, development and funding decisions related to public transportation.

This goal was included in the 2023 Link Lane Transit Development Plan, noting the strong local commitment to support and encourage public participation beyond state and federal planning requirements.

Objectives

Consistent with, and in support of, the Public Involvement and Consultation Policy of the Oregon Transportation Plan:

- In all phases of decision-making, provide residents early, open, continuous and meaningful opportunity to influence decisions about proposed transportation activities.
- Consult with state and federal agencies, Area Commissions on Transportation, elected officials, local advisory commissions and committees and other stakeholder groups.
- Seek out and facilitate the involvement of those potentially affected including traditionally underserved populations.
- Provide on-going communication to state and federal agencies, local governments and the public regarding local, state and federal goals, policies and the implementation of plans.
- Provide all residents, regardless of race, color, national origin, sex, age, disability, income or limited English proficiency equal access to transportation planning and decision-making.

Specific Strategies

To achieve the goals and address the objectives, different strategies and approaches will be used depending on the nature of the planning, development, and funding activity. The strategies listed below will evolve over time, be amended and added to; and are not meant to limit the development of creative and timely strategies in the coming years.

- The Link Lane Advisory Committee was formed during the creation of the Link Lane Transit Development Plan and consists of stakeholders from across the county. Link Lane staff will continue to engage with the Advisory Committee as needed.
- The LCOG Board of Directors is made up of representatives from 35 agencies, such as Lane County municipalities, school districts, utilities, and local educational services. Link Lane staff report to the Board of Directors and engage the Board of Directors for policy direction as needed.
- Link Lane solicits rider feedback through onboard surveys done at strategic planning intervals. The onboard surveys come from all types of riders and represent the diverse ridership that uses Link Lane services.
- Link Lane maintains an up-to-date website and regularly posts updates on the Link Lane Facebook page and communicates with members of the public through the Facebook page. Link Lane works with other local agencies and other groups such as the City of Florence, Siuslaw Vision, Lane Transit District and others to share messaging across platforms.

Link Lane's Public Involvement Philosophy

Link Lane welcomes and values public involvement. Link Lane believes that well-designed, proactive public involvement improves its planning and policy efforts and ultimately leads to better decisions, better projects, and maximized, long-term public benefits. Creating long-term, sustainable systems requires Link Lane to embrace outside skills and knowledge, including input from the public. Advantages of enhanced public involvement include:

- Increased public collaboration. Citizen collaboration on projects benefits Link Lane's processes and outcomes, promoting public participation and respectful, productive dialogue.
- Decisions that better reflect diverse interests. Consulting with all identifiable interests helps Link Lane better understand and reflect the full range of community values and livability standards.
- Efficient transportation decision implementation. Early public involvement fosters better decision making and reduces costly project plan revisions and change orders.
- Link Lane proactively involves the public in addressing transportation issues. The agency communicates its mission and goals to the widest audience possible and considers feedback received from transportation stakeholders and the public.

Link Lane embraces several specific goals:

- Provide for open and continuous communication to incorporate public input into decision-making and inform the public of planning, program functions, project activities, designs, and construction.
- Consult with local governments in identifying transportation needs, coordinating projects, and selecting viable solutions.
- Provide public input opportunities in developing local plans.
- Respond quickly and transparently to concerns expressed about Link Lane activities and educate the public about transportation programs and issues.
- Review and update public involvement strategies and process as needed, continuously evaluate public outreach activity effectiveness, and use the results to improve the program.
- Ensure minorities and low-income populations have opportunities to participate in the public involvement process.
- Foster internal communication and training to promote public involvement process understanding and implementation.

Link Lane periodically reviews its public involvement processes for effectiveness. Striving for continuous improvement, every five years Link Lane will request comments from the LCOG Board of Directors, local municipal partners, transportation providers, and the general public.

Link Lane Public Meeting Locations are Selected Based on the Goal of Diverse Public Involvement

In order to maximize public participation, especially from a diverse population, Link Lane uses guidelines when selecting locations and schedules for public meetings. Link Lane makes every attempt to:

- Schedule meetings at times and locations that are convenient and accessible for minority and LEP communities;
- Employ different meeting sizes and formats including town hall type meeting formats as well as online and in-person forums;
- Coordinate with community organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities;
- Consider radio, television, social media, or newspaper ads that serve LEP populations;
- Educate on public transportation options available to and from the meeting if requested;
- Provide opportunities for public participation through means other than written communication, such as one-on-one interviews, phone calls, or use of audio or video recording devices to capture oral comments.

Minority, Low-Income, and LEP Participation in Environmental Justice Issues

The Link Lane public involvement process must conform to the U.S. Department of Transportation (USDOT)/(FHWA) Order 6640.23A (June 14, 2012) that establishes policies and procedures for

complying with Executive Order 12898 (February 11, 1994) “FHWA Actions to Address Environmental Justice in Minority Populations and Low-Income Populations”.

This directive requires Link Lane to identify and prevent discriminatory effects caused by a proposed action. The public process must:

- Obtain information on the population type a proposed action serves or affects.
- Identify and address disproportionately high and adverse environmental effects a proposed action will have on minority and low-income populations.
- Provide minorities and low-income populations opportunity to participate.
- Solicit input from affected minority and low-income populations when evaluating alternatives.
- Disseminate information in an easily accessible manner for minorities and low-income populations.

Summary of Recent Outreach Efforts

Link Lane finalized a Transit Development Plan in 2023. Through that planning process, Link Lane engaged the public three different times to gather feedback that was incorporated into the final planning document. Each round of outreach included an online presentation and feedback session in English and an online presentation and feedback session in Spanish. There was also an in-person outreach session in Spanish.

Information about Link Lane is on the Link Lane website with a statement of accessibility and direct contact information.

Link Lane also conducted an onboard survey in 2023 requesting feedback from current riders. Link Lane plans to do this at least once every three years.

5. Four Factor Analysis

What does it mean to be Limited English Proficient (LEP)?

LEP individuals do not speak English as their primary language and therefore have a limited ability to read, write, speak, or understand English. Many LEP persons are in the process of learning English and may read, write, speak, and/or understand some English, but not proficiently. LEP status may be context-specific – an individual may have sufficient English language skills to communicate basic information (name, address etc.) but may not have sufficient skills to communicate detailed information in English.

Background

Federal law prohibits discrimination based on national origin. National origin discrimination includes discrimination based on a person’s inability to speak, read, write or understand English. Recipients of Federal funds must provide meaningful access to LEP individuals.

On August 11, 2000, Executive Order 13166, titled, “Improving Access to Services by Persons with Limited English Proficiency,” was issued. Executive Order 13166 requires Federal agencies to assess and address the needs of otherwise eligible persons seeking access to federally conducted programs and activities who, due to LEP cannot fully and equally participate in or benefit from those programs and activities. Section 2 of the Executive Order 13166 directs each Federal department or agency "to prepare a plan to improve access to...Federally conducted programs and activities by eligible LEP persons...."

Framework for Deciding when Language Services are Needed

Link Lane Transportation Program will take the following steps to ensure meaningful access to its programs, services, and activities for LEP individuals in a manner that balances the following four factors.

FOUR-FACTOR ANALYSIS

The Four Factor Analysis is a local assessment that considers:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by Link Lane;
2. The frequency with which LEP persons come into contact with Link Lane services and programs;
3. The nature and importance of Link Lane’s services and programs in people’s lives; and
4. The resources available to Link Lane for LEP outreach, as well as the costs associated with that outreach.

Factor One: The number or proportion of LEP persons eligible to be serviced or likely to be encountered by Link Lane.

The first step in determining the appropriate components of a Language Assistance Plan is understanding the proportion of LEP persons who may encounter Link Lane’s services, their literacy skills in English and their native language, the location of their communities and neighborhoods and, more importantly, if any are underserved as a result of a language barrier.

To do this, Link Lane evaluated the level of English proficiency and to what degree people in its service area speak a language other than English and what those languages are. Data for this review is derived from the United States Census and the American Community Survey. The most recent data available for the state were the ACS 2018-2022 five-year estimates.

Service Area Overview

Lane County is home to 382,353 people (2022 U.S. Census estimates) within its 4,554 square miles. The percentage of persons living below the poverty level is 15.3%, per the 2022 American Community Survey. The tables below show demographic data of the Lane County population:

Race	Number of People	Percentage of the Population
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White	310,635	81.2%
Black or African American	4,446	1.2%
American Indian and Alaska Native	4,346	1.1%
Asian Indian	406	0.1%
Chinese	2,829	0.7%
Filipino	1,408	0.4%
Japanese	1,352	0.4%
Korean	1,286	0.3%
Vietnamese	447	0.1%
Other Asian	1,856	0.5%
Native Hawaiian and Other Pacific Islander	763	0.2%
Some Other Race	11,154	2.9%
White and Black or African American	2,971	0.8%
White and American Indian and Alaska Native	7,748	2.0%
White and Asian	6,401	1.7%
White and Some Other Race	17,693	4.6%
Black or African American and American Indian and Alaska Native	336	0.1%
Black or African American and Some Other Race	370	0.1%

Persons of Hispanic, Latino, or Spanish Origin	Number of People	Percentage of the Population
Hispanic or Latino (of any race)	38,513	10.07%
Mexican	27,868	7.29%
Puerto Rican	1,908	0.50%
Cuban	931	0.24%
Other Hispanic or Latino	7,806	2.04%
Not Hispanic or Latino	343,840	89.93%

A number of languages are spoken in Lane County; many people that speak another language also speak English very well. Of the total county population, just 8,360 people, or 2.29%, speak English less than very well. A breakdown of the language groups, and those speaking English less than very well are shown below, per the 2022 American Community Survey.

Total Population of Lane County 5 years and over	365,261	
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Language Group	Number of people who speak the language and English less than very well	Percentage of County population that speaks the language and English less than very well
Spanish	4,972	1.36%
Indo-European Languages	1030	0.28%
Asian and Pacific Island languages	2164	0.59%
Other unspecified languages	194	0.05%

Total number / percentage

8,360

2.29%

The Safe Harbor Provision

The U.S. Department of Transportation (U.S. DOT) has adopted the U.S. Department of Justice’s Safe Harbor Provision. This provision outlines circumstances that can provide a “safe harbor” for U.S. DOT recipients (and sub-recipients) regarding translation of vital documents. Specifically, if a recipient provides written translation of vital documents for each LEP group that constitutes the lesser of 1,000 persons or five percent (5%) of the total population eligible to be served or likely to be affected or encountered, such action is considered strong evidence of compliance with the recipient’s written translation obligations.

The Safe Harbor Provision only applies to the translation of written documents. It does not affect Link Lane’s requirement to provide meaningful access to LEP individuals through oral language services.

A vital document is any document that is critical for ensuring meaningful access to the recipients' major activities and programs by beneficiaries generally and LEP persons specifically. Whether or not a document (or the information it solicits) is "vital" may depend upon the importance of the program, information, encounter, or service involved, and the consequence to the LEP person if the information in question is not provided accurately or in a timely manner.

The data above shows that just one language meets the Safe Harbor threshold—Spanish. Lane County is home to 4,972 people (1.36% of the population) who speak Spanish while speaking English less than very well. The number of people who speak other languages and English less than very well all comprise under 0.60% of the population each.

Designation of Vital Documents

Based on the limited population of Spanish speakers who also speak English less than very well, Link Lane designates the following as Vital Documents which be translated to Spanish: Title VI Notice to the Public, Combined Civil Rights Complaint Form (Title VI and ADA), Title VI Complaint Procedures, ADA Complaint procedures.

Factor Two: The frequency with which LEP persons come into contact with Link Lane Transportation Services' programs.

Link Lane recognizes the importance of taking measures to gauge LEP needs. For future onboard surveys, Link Lane will include a question regarding LEP.

Factor Three: The Importance of Link Lane's Service to People's Lives

Link Lane services impact many Lane County residents. Link Lane provides a vital connection between Florence and Yachats, as well as Florence and Eugene, connecting many residents to lifeline services. Link Lane's services are therefore important to LEP person's lives, and must be accessible to everyone, regardless of ability to speak English.

Factor Four: Resources and Costs for LEP Outreach

Given that Lane County has a very limited number of LEP citizens, Link Lane can meet the needs of its LEP population through relatively simple means. First, free resources include the use of Google Translate or other technology-based translation services. Link Lane can utilize Google Translate to interpret simple comments or messages left on Link Lane social media or other types of written communication received.

Link Lane recognizes there will be times when professional interpretation or translation services are needed. In those cases where a citizen needs to communicate with Link Lane in another language, Link Lane employees have access to a telephone interpretation service called Language Line. This is a pay-as-needed service under which Link Lane is billed per minute for service. This makes the service affordable. Finally, Link Lane will pay for document translation services when needed. For example, the Spanish translation of vital documents included in this Program were completed by a professional.

These resources give Link Lane the ability to perform outreach with the LEP population at a reasonable cost.

6. LEP Language Assistance Plan

Four Factor Analysis Results

As Described in section 5, Lane County's population has 2.29% of people who speak other languages and English less than very well. It is difficult to determine how many LEP people are accessing the services or require assistance for meaningful access. Efforts continue to build a better understanding of how LEP populations are accessing services and if further action is necessary for meaningful access. Link Lane has not had any direct reports of discrimination or complaints regarding access of transportation services from the LEP community since Link Lane services began in 2018.

Providing Language Assistance

Link Lane has vital documents in alternative language on the website. Resources are readily available to translate communications in writing with option of interpreter services as needed. The Special/Rural Transportation/Title VI coordinator is the primary contact and trained in accessing these resources and response measures.

Notice of Availability of Language Assistance

Information about accessibility is included in public notices and on meeting agendas with a contact listed. Documents on public participation opportunities published online also contain a statement of accessibility with a contact listed.

Monitoring and Evaluation of LAP

Efforts continue to build a better understanding of how LEP populations are accessing services and if further action is necessary for meaningful access. These efforts include reviewing demographic information about the area being served, coordination with ODOT Office of Civil Rights, reviewing any Civil Rights complaints of Link Lane, and expanding data collection efforts of those accessing services.

Employee Training

Link Lane contracts with a private operator to provide direct transportation services and therefore is not the first public facing entity for LEP persons accessing services.

Employees of Link Lane are trained to include accessibility statements in their public facing communications and to access resources described in section 5, factor 4 of this document, in assisting non-English language persons for any communications that are sent directly to Link Lane.

Summary of Language Assistance to LEP Persons

Link Lane recognizes the importance of participation from the general public including LEP persons. Sensitivity to the LEP population is demonstrated through Link Lane’s philosophy of service, outreach efforts, and resources dedicated to serving the LEP community.

7. LCOG Board of Directors Committee Membership

The following members serve on the LCOG Board of Directors and serve as the Board of Directors for Link Lane.

[City of Coburg](#): Nancy Bell

[City of Cottage Grove](#): Candace Solesbee

[City of Creswell](#): Dave Stram

[City of Dunes City](#): Ed McGuire

[City of Eugene](#): Randy Groves

[City of Florence](#): Robert Ward

[City of Junction City](#): Kenneth Wells

[City of Lowell](#): Don Bennett

[City of Oakridge](#): Bryan Cutchen

[City of Springfield](#): Kori Rodley

[City of Veneta](#): Robbie McCoy

[City of Westfir](#): D'Lynn Williams

[Emerald People's Utility District](#): Patti Chappel

[Eugene Water and Electric Board](#): Sonya Carlson

[Fern Ridge Library District](#): Steve Recca

[Heceta Water PUD](#): Carl Neville

[Junction City RFPD](#): Don Lighty

[Lane Community College](#): Mike Eyster

[Lane County](#): Heather Buch

[Lane Education Service District](#): Sherry Duerst-Higgins

[Lane Library District](#): Vacant

[Lane Transit District](#): Pete Knox

[Port of Siuslaw](#): Vacant

[Rainbow Water and Fire District](#): James (Jim) McLaughlin

[River Road Park and Recreation District](#): Curt Kendall

[School District 19](#): Ken Kohl

[School District 4J](#): Jenny Jonak

[School District 40](#): Lacey Risdal

[School District 45J3](#): Sherry Duerst-Higgins

[School District 52](#): Ashley Espinoza

[School District 68](#): Alyssa Brownlee

[Siuslaw Public Library District](#): Donna Oshel

[Siuslaw Valley Fire and Rescue](#): Keith Stanton

[Western Lane Ambulance District](#): Linda Stent

[Willamalane Park and Recreation District](#): Greg James

The members of the Link Lane Board of Directors were asked to fill out an anonymous survey to voluntarily self-identify which race/ethnic category they most identify with.

[Insert table with demographic information]

8. Subrecipient Oversight for Title VI

To ensure that those of Limited English Proficiency can access and participate in planning, programming and decision-making processes, Link Lane has completed a four-factor analysis

regarding the Language Assistance Plan. It is important to note that Link Lane serves as a pass through and does not directly provide public transportation services.

Operators are also required to have robust TITLE VI programs reflecting efforts to serve the LEP population. Operators are required to report to Link Lane if they receive a complaint.

9. Title VI Equity Analysis Information

Currently there are no new facilities being planned, nor have any facilities been built anytime in recent memory that would fit into the intent of this requirement. Link Lane, as a program of the Lane Council of Governments, does not have jurisdictional authority over property. However, if this changes, and Link Lane intends to build a facility that does warrant this scrutiny, and for which a NEPA process has not been required, Link Lane will complete a Title VI equity analysis during the planning stage with regard to where a project is to be located to ensure the location is selected without regard to race, color, or national origin. Impacts of various location alternatives, and the analysis will occur before the selection of the preferred site.

10. Vital Documents in Spanish

Link Lane Transportation Program Title VI Notice to the Public

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Any person who desires more information regarding the Title VI Program can contact its Title VI Program Coordinator with the Office of Civil Rights - at the address noted below.

Any person who believes they have, individually or as a member of any specific class of persons, been subjected to discrimination on the basis of race, color, or national origin has the right to file a formal complaint. Any such complaint must be in writing and submitted within 180 days following the date of the alleged occurrence to: (see below)

Programa de Transporte del Link Lane Título VI Aviso al Público

El Programa de Transporte Rural/Especial del Link Lane da aviso público de su política para defender y asegurar el pleno cumplimiento de los requisitos de no discriminación del Título VI de la Ley de Derechos Civiles de 1964 y las autoridades de no discriminación relacionadas. El Programa de Transporte del Link Lane opera sus programas y servicios sin distinción de raza, color u origen nacional de acuerdo con el Título VI de la Ley de Derechos Civiles.

Cualquier persona que desee obtener más información sobre el Programa del Título VI puede comunicarse con el Coordinador del Programa del Título VI en la Oficina de Derechos Civiles, en la dirección que se indica a continuación.

Cualquier persona que crea que, individualmente o como miembro de cualquier clase específica de personas, ha sido objeto de discriminación por motivos de raza, color u origen nacional tiene derecho a presentar una queja formal. Cualquier queja de este tipo debe realizarse por escrito y presentarse dentro de los 180 días siguientes a la fecha del presunto suceso a:

Link Lane Transportation Program Title VI Coordinator
c/o Lane Council of Governments
859 Willamette St. Suite 500
Eugene, OR 97401

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