

**LIFT Community Action Agency,
Inc. LIFT CAA Transit**

Title VI Program

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A. Introduction

LIFT Community Action Agency, Inc.'s Transit Program agrees to comply with all provisions prohibiting discrimination on the basis of race, color, or national origin of Title VI of the Civil Rights Act of 1964, as amended, 42 U.S.C. 200d *et seq.*, and with U.S. DOT regulations, "Nondiscrimination in Federally-Assisted Programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act," 49 CFR part 21.

LIFT Community Action Agency, Inc.'s Transit Program assures that no person shall, as provided by Federal and State civil rights laws, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity. **LIFT Community Action Agency, Inc.'s Transit** Program further ensures every effort will be made to ensure non-discrimination in all programs and activities, whether those programs and activities are federally funded or not.

LIFT Community Action Agency, Inc.'s Transit Program meets the objectives of the FTA Master Agreement which governs all entities applying for FTA funding, including **LIFT CAA Transit** and its third-party contractors by promoting actions that:

- A. Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin.
- B. Identify and address, as appropriate, disproportionately high and adverse effects of programs and activities on minority populations and low-income populations.
- C. Promote the full and fair participation of all affected Title VI populations in transportation decision making.
- D. Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations.
- E. Ensure meaningful access to programs and activities by persons with Limited English Proficiency (LEP).

B. Agency Information

1. Mission of LIFT COMMUNITY Action Agency, Inc.

To Improve the Lives of low-income individuals and families through service and collaboration leading to self-sufficiency.

2. History of LIFT CAA Transit Program

LIFT CAA Transit is a rural public transportation system that was established by LIFT Community Action Agency, Inc. in 1983. Public demand/response routes operate Monday through Friday within the city limits of Hugo, Antlers, Broken Bow, Clayton and Idabel. These routes operate from 8:00 a.m. to 4:30 p.m. LIFT CAA Transit's fleet of vehicles include mini-vans, center- aisle buses and multi-function school activity buses. These vehicles are assigned to the five dispatch locations within the three counties according to the number of employees staffed and the trip volume generated from the respective location. Ninety-two percent (92%) of the overall fleet is ADA accessible.

LIFT Transit currently has 15 full-time drivers and 1 part-time driver. With office and support staff, there is a total of 26 employees within the transit program. A percentage of full-time drivers receive training to obtain a CDL license. Training for all transit employees includes drug and alcohol misuse/abuse, defensive driving, CPR/First Aid and Passenger Assistance and Sensitivity Awareness.

LIFT Transit continues to provide service for eligible Medicaid recipients who are able to access non-emergency medical transportation through the program called Sooner Ride. LIFT Transit also continues a partnership with the Department of Human Services to assist eligible TANF clients with transportation to and from educational facilities and/or work sites.

Communications are accomplished through the use of two-way radios and cellular phones. Toll-free numbers are available for contact with the Hugo, Idabel, and Antlers offices. Customers activate our transit service by contacting the call center located in their area. The dispatcher enters the request onto a daily call log and then dispatches the call to the available driver.

Customers utilize the services of LIFT CAA Transit for a variety of reasons. Some use the service for recreational purposes such as shopping or social gatherings. Others gain access to employment or medical treatment locally or to more distant points. Another group depends on our services for connections to the urban areas.

The fact that so many different kinds of people use our transit services shows the diversity and flexibility we have developed over the years. We plan for future growth by retaining experienced personnel and replacing the aging units in our vehicle fleet. We continue to explore options for expanding existing routes and developing new routes.

3. Regional Profile (regional population; growth projection)

Total Population

A total of 56,310 people live in the 4,016.68 square mile report area defined for this assessment according to the U.S. Census Bureau American Community Survey 2017-21 5-year estimates. The population density for this area, estimated at 14 persons per square mile, is less than the national average population density of 93 persons per square mile.

Report Area	Total Population	Total Land Area (Square Miles)	Population Density (Per Square Mile)
Report Location	56,310	4,016.68	14
Choctaw County, OK	14,307	770.38	19
McCurtain County, OK	31,112	1,850.77	17
Pushmataha County, OK	10,891	1,395.54	8
Oklahoma	3,948,136	68,596.51	58
United States	329,725,481	3,533,041.03	93

As can be seen from the table above, there are a total of 56,310 individuals living within the LIFT CAA Transit service area. The entire service area encompasses more than 4000 square miles.

4. Population served (in relation to regional population)

The population served by the LIFT CAA Transit program for local on-demand rides includes the City of Hugo in Choctaw County, the Cities of Idabel and Broken Bow in McCurtain County and the Cities of Antlers and Clayton in Pushmataha county.

The population for these communities are:

- 4,973 – Hugo
- 6,732– Idabel
- 4,103 – Broken Bow
- 2203– Antlers
- 639 – Clayton

The total population to be served through local on-demand response is 18,470 or 33% of the overall service area population.

5. Service area

Local on-demand service area includes the Cities of Hugo (Choctaw County); Idabel and Broken Bow (McCurtain County); Antlers and Clayton (Pushmataha County).

Map and Description of Service Area

LIFT Community Action Agency, Inc.

Primary Service Counties (Oklahoma): Choctaw County, McCurtain County, Pushmataha County



6. Governing body make-up (include terms of office)

LIFT CAA's Tri-partite Governing Board is comprised of 27 members. The makeup includes equal representation from three sectors which include nine Public, nine Private and nine low-income representatives. Board members seats are up for renewal every three years with the exception of officers which must change every three years. The officer positions include Chair, Vice Chair and Secretary/Treasurer. Board members must reside in the county from which they represent.

C. Notice to the Public

NOTIFYING the PUBLIC of RIGHTS UNDER TITLE VI

LIFT Community Action Agency, Inc. Transit

- The LIFT Community Action Agency, Inc.'s Transit Program operates its programs without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the LIFT Community Action Agency, Inc.'s Transit Program. For more information on the LIFT Community Action Agency, Inc.'s Transit Program civil rights program, and procedures to file a complaint, contact 580-326-8176, (TDD/TTY #7-1-1); email jeannie.mernillin@liftca.org; or visit our administrative office at 209 N. 4th Street, Hugo, OK. 74743
- A complainant may file a complaint directly with the Oklahoma Department of Transportation by filing a complaint with the Contract Compliance Division, Attention: Contract Compliance Division Manager, 200 NE 21st Street, Oklahoma City, OK 73105-3204.
- If information is needed in another language contact Dawn McDaniel @ (580) 326-3351 **Si necesita informacion en otro idioma, por favor contacte Dawn McDaniel @ 580-326-3351**

The Title VI Notice to the Public on how/where to file a complaint is located on every active transit vehicle in LIFT CAA's Transit fleet. The procedures and form is also accessible on the agency's website. Title VI Rights and the process for filing a complaint is also posted at each of the four dispatch locations (Hugo, Antlers, Idabel and Broken Bow Oklahoma). More information as well as the actual procedures and form are located on the following pages.

D. Procedure for Filing a Title VI Complaint

Filing a Title VI Complaint

The complaint procedures apply to the beneficiaries of **LIFT Community Action Agency, Inc.** programs, activities, and services.

RIGHT TO FILE A COMPLAINT: Any person who believes they have been discriminated against on the basis of race, color, or national origin by **LIFT Community Action Agency, Inc.** may file a Title VI complaint by completing and submitting the agency's **Title VI Complaint Form (see sample below)**. Title VI complaints must be received in writing within 180 days of the alleged discriminatory complaint.

HOW TO FILE A COMPLAINT: Information on how to file a Title VI complaint is posted on our agency's website www.liftca.org and in public areas of our agency.

You may download the **LIFT Community Action Agency, Inc.** Title VI Complaint Form at <https://liftca.org/wp-content/uploads/2021/10/Title-VI-Complaint-Procedures-and-Form-pdf-fillable.pdf> or request a copy by writing to **LIFT Community Action Agency, Inc. 209 N 4th Street, Hugo, OK. 74743**. Information on how to file a Title VI complaint may also be obtained by calling **LIFT CAA at 580-326-8176 or 580-326-3351**.

You may file a signed, dated complaint no more than 180 days from the date of the alleged incident. The complaint should include:

- Your name, address and telephone number.
- Specific, detailed information (how, why and when) about the alleged act of discrimination.
- Any other relevant information, including the names of any persons, if known, the agency should contact for clarity of the allegations.

Please submit your complaint form to:

LIFT Community Action Agency, Inc.
Rebecca Porter, Executive Director
209 N 4th Street
Hugo, OK. 74743

COMPLAINT ACCEPTANCE: **LIFT Community Action Agency, Inc.** will process complaints that are complete.

Once a completed Title VI Complaint Form is received, **LIFT Community Action Agency, Inc.** will review it to determine **LIFT Community Action Agency, Inc.** has jurisdiction. The complainant will receive an acknowledgement letter informing them whether or not the complaint will be investigated by **LIFT Community Action Agency, Inc.**

INVESTIGATIONS: **LIFT Community Action Agency, Inc.** will generally complete an investigation within 90 days from receipt of a completed complaint form. If more information is needed to resolve the case, LIFT CAA's **Title VI Coordinator, Jeannie McMillin** may contact the complainant.

Unless a longer period is specified by the **Title VI Coordinator**, the complainant will have ten (10) days from the date of the letter to send requested information to **LIFT Community Action Agency, Inc.** investigator assigned to the case.

If the requested information is not received within that timeframe the case will be closed. Also, a case can be administratively closed if the complainant no longer wishes to pursue the case.

LETTERS OF CLOSURE OR FINDING: After the Title VI investigator reviews the complaint, the Title VI investigator will issue one of two letters to the complainant: a closure letter or 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.
- A Letter of Finding (LOF) summarizes the allegations and provides an explanation of the corrective action taken.

If the complainant disagrees with **LIFT Community Action Agency Inc.'s** determination, the complainant may request reconsideration by submitting the request in writing to the Title VI investigator within seven (7) days after the date of the letter of closure or letter of finding, stating with specificity the basis for the reconsideration. **LIFT Community Action Agency, Inc.** will notify the complainant of the decision either to accept or reject the request for reconsideration within ten (10) days. In cases where reconsideration is granted, **LIFT Community Action Agency, Inc.** will issue a determination letter to the complainant upon completion of the reconsideration review.

A person may also file a complaint directly with the Federal Transit Administration, at the FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

If information is needed in another language, contact **Jeannie McMillin, Transit Director** at **209 N. 4th Street, Hugo, OK. 74743** or at **580-326-8176**.

E. Monitoring Title VI Complaints, Investigations, Lawsuits *and* Documenting Evidence of Agency Staff Title VI Training

Documenting Title VI Complaints/Investigations

All Title VI complaints will be entered and tracked in **LIFT Community Action Agency's Transit Program** complaint log. Active investigations will be monitored for timely response on the part of all parties. The agency's Title VI Coordinator shall maintain the log.

Agency Title VI Complaint Log

Date complaint filed	Complainant	Basis of complaint R-C-NO	Summary of allegation	Pending status of complaint	Actions taken	Closure Letter (CL)	Letter of Finding (LOF)	Date of CL or LOF

Documenting Evidence of Agency Staff Title VI Training

LIFT Community Action Agency's Transit Program staff is given Title VI training, and agency can answer affirmatively to all the following questions:

1. Are new employees made aware of Title VI responsibilities pertaining to their specific duties?
2. Do new employees receive this information via employee orientation?
3. Is Title VI information provided to all employees and program applicants?
4. Is Title VI information prominently displayed in the agency and on any program materials distributed, as necessary?

F. Public Participation Plan

Goal

The goal of the Public Participation Plan is to have significant and ongoing public involvement, by all identified audiences, in the public participation process for major agency outreach efforts.

Objectives

- To understand the service area demographics and determine what non-English languages and other cultural barriers exist to public participation.
- To provide general notification of meetings and forums for public input, in a manner that is understandable to all populations in the area.
- To hold public meetings in locations that are accessible to all area stakeholders, including but not limited to minority and low income members of the community.
- To provide methods for two-way communication and information and input from populations which are less likely to attend meetings.
- To convey the information in various formats to reach all key stakeholder groups.

Identification of Stakeholders

Stakeholders are those who are either directly or indirectly affected by an outreach effort, system or service plan or recommendations of that plan. Stakeholders include but are not limited to the following:

- Board of Directors – the governing board of the agency. The role of the Board is to establish policy and legislative direction for the agency. The Board defines the agency’s mission, establishes goals, and approves the budget to accomplish the goals.
- Advisory Bodies – non-elected advisory bodies review current and proposed activities of the agency, and are encouraged to be active in the agency’s public participation process. Advisory bodies provide insight and feedback to the agency.
- Agency Transit riders and clients
- Minority and low income populations, including limited English proficient persons
- Local jurisdictions and other government stakeholders
- Private businesses and organizations
- Employers
- Partner agencies

Elements of the Public Participation Plan

It is necessary to establish a public participation plan that includes an outreach plan to engage minority and limited English proficient (LEP) populations.

Elements of the Public Engagement Plan include:

1. Public Notice

- a. Official notification of intent to provide opportunity for members of the general public to participate in public engagement plan development, including participation in open Board/council meetings, and advisory committees.

2. Public Engagement Process/Outreach Efforts:

- a. Public meetings
- b. Open houses
- c. Rider forums
- d. Rider outreach
- e. Public hearings
- f. Focus groups
- g. Surveys
- h. Services for the Disabled (Notices of opportunities for public involvement include contact information for people needing these or other special accommodations.)

Events such as public meetings and/or open houses are held at schools, churches, libraries and other non-profit locations easily accessible to public transit and compliant with the Americans with Disabilities Act.

3. Public Comment

- a. Formal public comment periods are used to solicit comments on major public involvement efforts around an agency service or system change.
- b. Comments are accepted through various means:
 - i. Dedicated email address.
 - ii. Website.
 - iii. Regular mail.
 - iv. Forms using survey tool for compilation.
 - v. Videotaping.
 - vi. Phone calls to Customer Service Center [phone]

4. Response to Public Input

All public comments are provided to the Board of Directors prior to decision making. A publicly available summary report is compiled, including all individual comments.

Title VI Outreach Best Practices

LIFT Community Action Agency, Inc. Transit Program ensures all outreach strategies, communications and public involvement efforts comply with Title VI. **LIFT Community Action Agency, Inc. Transit Program** Public Participation Plan proactively initiates the public involvement process and makes concerted efforts to involve members of all social, economic, and ethnic groups in the public involvement process. Aligned with the above referenced

communication tactics, **LIFT Community Action Agency, Inc. Transit Program** provides the following:

- a. Public notices published in non-English publications (if available).
- b. Title VI non-discrimination notice on agency's website.
- c. Agency communication materials in languages other than English (subject to Safe Harbor parameters).
- d. Services for Limited English Proficient persons. Upon advance notice, translators may be provided.

2023-2026 Title VI Program Public Participation Process

LIFT Community Action Agency, Inc. Transit Program has conducted a Public Participation Process for the 2023-2026 Title VI Program. This process includes Community Meetings to seek input, provide education, and highlight key components of the Title VI Plan. Materials have been created to explain Title VI policies as well as provide education on how they relate to minority populations.

LIFT Community Action Agency, Inc. Transit Program has provided briefings to the Board of Directors and Advisory Bodies.

LIFT Community Action Agency, Inc. Transit Program has conducted a 30 day public comment period to provide opportunities for feedback on the 2023-2026 Title VI Program.

Comments are accepted during the public outreach period via:

- a. Email
- b. Mail
- c. Phone
- d. In person
- e. Survey tool (*agency option*)

Summary of 2023-2026 Public Outreach Efforts

1. Planning and Development - Describe how your organization will involve or has involved the public in the planning and development of the rural public transportation program.

PUBLIC INVOLVEMENT

Three public forums were held in March, 2023. These meetings were held at locations in all three counties of operation. The first public forum was held at Antlers, OK (Pushmataha County) on March 21, 2023 at 10:00 a.m. The second public forum was held in Idabel, OK (McCurtain County) on March 22, 2023 at 10:00 a.m. The third public forum was held in Hugo, OK (Choctaw County) on March 23, 2022 at 10:00 a.m. Notices were sent to social service organizations prior to the meeting dates. Fliers were passed out to the general public prior to each meeting. Free transportation was provided for any public residents who wished to attend. Invitations were also extended to the tribal organizations in the areas of operation.

Invitations were also sent to the Department of Humans Services staff. No one but LIFT Transit staff attended the meetings.

2. Public Notices - Which process will your agency use to afford the public an opportunity to comment on your transit services? *(Please select one only)*



Publish legal notices



Hold Public Hearings

Include dates and locations

- a. Provide the Proofs of Publications as attachments to this application.

3. Public Forums – Provide a short narrative of your agency’s plans to hold at least two public/open forums during the program year, include dates and locations.

PUBLIC FORUMS

We will hold two virtual public forums within the program year. The first virtual forum will be held in January, 2024 and the second one will be held in April, 2024.

G. Language Assistance Plan

LIFT Community Action Agency, Inc. Limited English Proficiency Plan

This limited English Proficiency (LEP) Plan has been prepared to address **LIFT Community Action Agency, Inc.’s** responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964; Federal Transit Administration Circular 4702.1B, dated October 1, 2012, which states that the level and quality of transportation service is provided without regard to race, color, or national origin.

Executive order 13166, titled “Improving Access to Services for Persons with Limited English Proficiency,” indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discriminations do not take place. This order applies to all state and local agencies which receive federal funds.

Service Area Description:

Local on-demand service area includes the Cities of Hugo (Choctaw County); Idabel and Broken Bow (McCurtain County); Antlers and Clayton (Pushmataha County).

LIFT Community Action Agency, Inc. has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided by **LIFT Community Action Agency, Inc..** As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify a person who may need language assistance, and the ways in which assistance may be provided.

In order to prepare this plan, **LIFT Community Action Agency, Inc.** undertook the **four-factor LEP analysis** which considers the following factors:

Four Factor Analysis

1. The number and proportion of LEP persons eligible to be served or likely to be encountered in the service area:

A significant majority of people in the **LIFT Community Action Agency, Inc.** service area are proficient in the English language. Based on 2010 Census data, **[9.3%]** of the population five years of age and older speak English “less than very well” – a definition of limited English proficiency

	LEP Population in TRANSIT AGENCY Service Area						
Population 5 years and over by language spoken at home and ability to speak English	Antlers, Ok	Clayton OK	Broken Bow Oklahoma	Hugo, Oklahoma	Idabel, Oklahoma	Service Area Total	Percentage of Population 5 Years and Older
<u>TOTAL Population</u>	2203	639	4103	4973	6732	18,650	
<u>Population 5 Years and Over</u>	2157	578	3910	4758	6250	17,653	95%
Speak English "less than very well"	0%	0.7%	4.1%	.9%	3.7%	9.40%	
<u>Spanish</u>	31	5	215	152	353	756	.04%
Speak English "less than very well"	1.4%	.9%	1.3%	.9%	2%	6.5%	
<u>Other Indo-European</u>	12	0	0	14	112	138	.01%
Speak English "less than very well"	0%	0%	0%	0%	.1%	.1%	
<u>Asian and Pacific Island</u>	11	4	209	0	133	357	.02%
Speak English "less than very well"	0.5%	.7%	2.9%	0%	1.6%	5.70%	
<u>All Other</u>	31	4	76	61	46	218	.01%
Speak English "less than very well"	0%	.7%	1.9%	0%	0%	2.60%	

2. Frequency of Contact by LEP Persons with **LIFT Community Action Agency, Inc.** Transit Services:

The **LIFT Community Action Agency, Inc. Transit** staff reviewed the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP persons. To date, **LIFT Community Action Agency, Inc. Transit** has, on average, **no requests** for an interpreter. **LIFT Community Action Agency, Inc. Transit** averages 3,680 phone calls per month.

LEP Staff Survey Form

LIFT Community Action Agency, Inc. is studying the language assistance needs of its riders so that we can better communicate with them if needed.

1. How often do you come into contact with passengers who do not speak English or have trouble understanding you when you speak English to them?

DAILY WEEKLY MONTHLY LESS THAN MONTHLY

2. What languages do these passengers speak?
3. What languages (other than English) do you understand or speak?
4. Would you be willing to serve as a translator when needed?

Frequency of Contact with LEP Persons

Frequency	Language Spoken by LEP Persons
Daily	
Weekly	
Monthly	
Less frequently than monthly	

3. The importance of programs, activities or services provided by **LIFT Community Action Agency, Inc.** to LEP persons:

Outreach activities, summarized in **LIFT Community Action Agency, Inc.'s** Title VI Public Engagement Plan, include events such as public meetings and/or open houses held at schools, churches, libraries and other non-profit locations, and include specific outreach to LEP persons to gain under-standing of the needs of the LEP population, and the manner (if at all) needs are addressed.

Outside Organization LEP Survey

Organization: _____

1. What language assistance needs are encountered?
2. What languages are spoken by persons with language assistance needs?
3. What language assistance efforts are you undertaking to assist persons with language assistance needs?

4. When necessary, can we use these services?

4. The resources available to **LIFT Community Action Agency, Inc.** and overall cost to provide LEP assistance:

Strategies for Engaging Individuals with Limited English Proficiency include:

1. Language line. Upon advance notice, translators can be provided.
2. Language identification flashcards.
3. Written translations of vital documents (identified via safe harbor provision)
4. One-on-one assistance through outreach efforts.
5. Website information.
6. To the extent feasible, assign bilingual staff for community events, public hearings and Board of Directors meetings and on the customer service phone lines.

As applicable: Based on our demographic analysis (Factor 1) **LIFT Community Action Agency, Inc.** has determined that no language group(s) within its service area meets Safe Harbor criteria requiring written translated “vital documents” by language group(s).

LIFT Community Action Agency, Inc. will provide assistance and direction to LEP persons who request assistance.

Staff LEP Training

The following training will be provided to **LIFT Community Action Agency, Inc.** staff:

1. Information on **LIFT Community Action Agency, Inc.** Title VI Procedures and LEP responsibilities.
2. Description of language assistance services offered to the public.
3. Use of Language Identification Flashcards.
4. Documentation of language assistance requests.

Monitoring and Updating the LEP Plan

The LEP Plan is a component of **LIFT Community Action Agency, Inc.’s** Title VI Plan requirement.

LIFT Community Action Agency, Inc. will update the LEP plan as required. At minimum, the plan will be reviewed and updated when it is clear that higher concentrations of LEP individuals are present in the **LIFT Community Action Agency, Inc.** service area. Updates include the following:

1. How the needs of LEP persons have been addressed.
2. Determine the current LEP population in the service area.
3. Determine as to whether the need for, and/or extent of, translation services has changed.
4. Determine whether local language assistance programs have been effective and sufficient to meet the needs.

5. Determine whether **LIFT Community Action Agency, Inc.** financial resources are sufficient to fund language assistance resources as needed.
6. Determine whether **LIFT Community Action Agency, Inc.** has fully complied with the goals of this LEP Plan.
7. Determine whether complaints have been received concerning **LIFT Community Action Agency, Inc.'s** failure to meet the needs of LEP individual.



LIFT CAA POLICY AND PROCEDURES FOR COMMUNICATION WITH PERSONS WITH LIMITED ENGLISH PROFICIENCY

LIFT Community Action Agency, Inc. will take reasonable steps to ensure that persons with Limited English Proficiency (LEP) have meaningful access and an equal opportunity to participate in our services, activities, programs and other benefits. The policy of LIFT Community Action Agency, Inc. is to ensure meaningful communication with LEP clients and their authorized representatives. The policy also provides for communication of information contained in documents and forms applicable to LIFT Community Action Agency, Inc. All interpreters, translators and other aids needed to comply with this policy shall be provided without cost to the person being served, and clients and their families will be informed of the availability of such assistance free of charge.

Language assistance will be provided through use of competent bilingual staff, interpreters, and arrangements with local organizations providing interpretation translation services, technology, or telephonic interpretation services. All staff will be provided notice of this policy and procedure, and staff that may have direct contact with LEP individuals will be trained in effective communication techniques, including the effective use of an interpreter technology.

LIFT Community Action Agency, Inc. will conduct a regular review of the language access needs of our client population, as well as update and monitor the implementation of this policy and these procedures, as necessary.

PROCEDURES:

1. IDENTIFYING LEP PERSONS AND THEIR LANGUAGE

LIFT Community Action Agency, Inc. will promptly identify the language and communication needs of the LEP person. If necessary, staff will use a language identification card (or "I speak cards," available online at www.lep.gov) or posters to determine the language. In addition, when records are kept of past interactions with clients/residents or family members, the language used to communicate with the LEP person will be included as part of the record.

2. OBTAINING A QUALIFIED INTERPRETER

Dawn McDaniel, Human Resources Director, 580-326-3351 is responsible for:

(a) Maintaining an accurate and current list showing interpreter services including technology;

Dawn McDaniel will assist in operating the online translation program in order to communicate with individuals who have limited English proficiency.

Dawn McDaniel
209 N. 4th St.
Hugo, Oklahoma 74743
580-326-3351

LIFT Community Action Agency, Inc.
209 North 4th Street, Hugo, OK 74743
Telephone (580) 326-3351 Fax (580) 326-2305
www.liftca.org



8:00 AM to 12:00 PM, 12:30 PM to 4:30 PM

<http://translate.google.com/>

LIFT CAA can also enlist the professional services of www.worldlingo.com for translation services after gaining written approval from the LIFT CAA Executive Director. The list of languages for translation are listed at <http://translate.google.com/>.

(b) Contacting the appropriate bilingual staff member to interpret, in the event that an interpreter is needed, if an employee who speaks the needed language is available and is qualified to interpret;

(c) Obtaining an outside interpreter if a bilingual staff or staff interpreter is not available or does not speak the needed language.

www.worldlingo.com may to provide qualified interpreter services. The agency's services are available upon a case by case basis and will be determined by Dawn McDaniel, 209 N. 4th St., Hugo, Oklahoma, 580-326-3351, and approved by the Executive Director.

Some LEP persons may prefer or request to use a family member or friend as an interpreter. However, family members or friends of the LEP person will not be used as interpreters unless specifically requested by that individual and **after** the LEP person has understood that an offer of an interpreter at no charge to the person has been made by the facility. Such an offer and the response will be documented in the person's file. If the LEP person chooses to use a family member or friend as an interpreter, issues of competency of interpretation, confidentiality, privacy, and conflict of interest will be considered. If the family member or friend is not competent or appropriate for any of these reasons, competent interpreter services will be provided to the LEP person.

Children and other clients will **not** be used to interpret, in order to ensure confidentiality of information and accurate communication.

3. PROVIDING WRITTEN TRANSLATIONS

(a) When translation of vital documents is needed, LIFT Community Action Agency, Inc. will submit documents for translation into frequently-encountered languages to <http://translate.google.com/>. Original documents being submitted for translation will be in final form with updated and accurate information.

(b) Facilities will provide translation of other written materials, if needed, as well as written notice of the availability of translation, free of charge, for LEP individuals.

(c) LIFT Community Action Agency, Inc. may set benchmarks for translation of vital documents into additional languages over time.

LIFT Community Action Agency, Inc. 209
North 4th Street, Hugo, OK 74743 Telephone
(580) 326-3351 Fax (580) 326-2305
www.liftca.org



4. PROVIDING NOTICE TO LEP PERSONS

LIFT Community Action Agency, Inc. will inform LEP persons of the availability of language assistance, free of charge, by providing written notice in languages LEP persons will understand. This will be done by translating this document using <http://translate.google.com/> left click “.....[translate a document](#)” as needed. At a minimum, notices/signs will be posted at main points of entry and at location bulletin boards.

5. MONITORING LANGUAGE NEEDS AND IMPLEMENTATION

On an ongoing basis, LIFT Community Action Agency, Inc. will assess changes in demographics, types of services or other needs that may require reevaluation of this policy and its procedures. In addition, LIFT Community Action Agency, Inc. will regularly assess the efficacy of these procedures, including but not limited to mechanisms for securing interpreter services, equipment used for the delivery of language assistance, complaints filed by LEP persons, feedback from community organizations, etc.

H. Advisory Bodies

Table Depicting Membership of Committees, Councils, By Race

Advisory Body	Caucasian	Latino	African American	Asian American	Native American	Total
LIFT Governing Board of Directors (27 Members (1 vacancy))	15	1	4	1	5	100% (96% of seats filled as of August 30, 2023)

Description of efforts made to encourage minority participation on committees:
LIFT Community Action Agency, Inc.

Description of established procedures for low-income individuals and their representatives, or low-income organizations that consider themselves to be inadequately represented on the Board, to petition for adequate representation:

Representation of the Low-Income Sector of LIFT Community Action Agency, Inc.'s By-laws describes the overall process for low-income representation including the procedures for individuals/organizations that consider themselves to be inadequately represented on the board and how to petition for adequate representation. Below is an excerpt from the agency bylaws addressing this topic:

In the event that a community organization or representative group of the low-income, including, but not limited to, the minority low-income, the elderly low-income or the rural low-income, feel themselves inadequately represented on the Board, they may petition for adequate representation on the Board by following the procedure hereinafter set out.

A low-income individual, community organization, or religious organization, or representative of low-income individuals that considers its organization, or low-income individuals, to be inadequately represented on the Board may submit a petition for representation to the Chairman who shall present the petition to the Directors at the next Board meeting. In the case of unincorporated organizations or interests, the petition must be signed by at least 25 individuals, unless the Chairman determines that it is appropriate to waive this requirement in a particular case. The petitioning individual or organization shall be given an opportunity to be heard at a meeting of the Board, upon such reasonable terms as the Directors shall determine. A written statement of the Board's action on the petition shall be provided to the petitioning individual or group and a copy of the statement shall be sent to the appropriate government funding sources as required by law or procedure in effect from time to time. Should it decide to provide representation to the petitioning organization or interest, the Board shall take any actions necessary to provide that representation while ensuring that the Board's composition meets the requirements of the federal Community Services Block Grant Act and any other applicable laws or regulations.

I. Subrecipient Assistance

Subrecipient Assistance -= This is not applicable to LIFT CAA Transit Program

OPTION A

LIFT Community Action Agency, Inc. Transit Program does not have any subrecipients.

OPTION B

Primary recipients should provide subrecipients:

- Sample public notices, Title VI complaint procedures, and the recipient's Title VI complaint form.
- Sample procedures for tracking and investigating Title VI complaints filed with a subrecipient.
- Direction regarding obtaining demographic information of population served by subrecipients.
- Technical assistance.
- Reviews of Title VI Programs; follow-up as necessary.

J. Subrecipient Monitoring

Subrecipient Monitoring – Not Applicable as LIFT CAA Transit Program does not have any subrecipients.

OPTION A

LIFT Community Action Agency, Inc. Transit Program does not have any subrecipients.

OPTION B

Primary recipients must monitor subrecipients.

- Non-compliant subrecipient means primary recipient is also non-compliant.

Primary recipients shall:

- Document process for ensuring all subrecipients are complying with the general and specific requirements.
- Collect and review subrecipients' Title VI Programs.
- At FTA's request, the primary recipient shall request that subrecipients who provide transportation services verify that their level and quality of service is equitably provided.

K. Equity Analysis of Facilities

OPTION A

LIFT Community Action Agency, Inc. has not constructed any storage facilities, maintenance facilities, or operations centers in the last three years.

OPTION B1

LIFT Community Action Agency, Inc. performed an equity analysis of [a new facility] [new facilities] per Title VI regulations.

LIFT Community Action Agency, Inc. developed demographic data and mapped minority/low-income levels as a proportion to overall population. Similarly, **LIFT Community Action Agency, Inc.** mapped current locations of residences and businesses in the proposed facilities locations.

Demographic data and mapping

Guidance may be obtained from regional Metropolitan Planning Organization.

Regarding the location of applicable projects, no persons were displaced from their residences and/or businesses on the basis of race, color, or national origin.

OPTION B2

LIFT Community Action Agency, Inc. performed an equity analysis of [a new facility] [new facilities] per Title VI regulations.

LIFT Community Action Agency, Inc. developed demographic data and mapped minority/low-income levels as a proportion to overall population. Similarly, **LIFT Community Action Agency, Inc.** mapped current locations of residences and businesses in the proposed facilities locations.

Demographic data and mapping

Guidance may be obtained from regional Metropolitan Planning Organization.

Regarding the location of applicable projects, the “two-test” exercise was conducted and it was determined that the facility [facilities] could proceed, despite disparate impact, due to a “substantial legitimate justification” to meet a goal that is integral to the agency’s institutional mission. In addition, no comparable effective alternative location(s) would result in less disparate impact.

For Fixed Route Transit Providers

(The remaining two chapters apply to all fixed route providers, including those that do not meet volume threshold)

L. System-Wide Service Standards and Policies

Template for System-Wide Service Standards (1. 2. 3. 4.)

is presented in detail in

FTA Circular 4702.1B, Appendix G.

Template for System-Wide Service Policies (1. 2.)

is presented in detail in FTA Circular 4702.1B Appendix H.

ATTACHMENTS

Attachment 1 – Agency Information

LIFT CAA Transit is a rural public transportation system that was established by LIFT Community Action Agency, Inc. in 1983. Public demand/response routes operate Monday through Friday within the city limits of Hugo, Antlers, Broken Bow, Clayton and Idabel. These routes operate from 8:00 a.m. to 4:30 p.m. LIFT CAA Transit's fleet of vehicles include mini-vans, center- aisle buses and multi-function school activity buses. These vehicles are assigned to the five dispatch locations within the three counties according to the number of employees staffed and the trip volume generated from the respective location. Ninety-two percent (92%) of the overall fleet is ADA accessible.

Map and Description of Service Area

LIFT Community Action Agency, Inc.

Primary Service Counties (Oklahoma): Choctaw County, McCurtain County, Pushmataha County



Governing body make-up (include terms of office)

LIFT CAA's Tri-partite Governing Board is comprised of 27 members. The makeup includes equal representation from three sectors which include nine Public, nine Private and nine low-income representatives. Board members seats are up for renewal every three years with the exception of officers which must change every three years. The officer positions include Chair, Vice Chair and Secretary/Treasurer. Board members must reside in the county from which they represent.

Attachment 2 - Title VI Complaint Form



Title VI Complaint Procedures

LIFT Transit

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by LIFT Transit may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. LIFT Transit investigates complaints received no more than 180 days after the alleged incident. LIFT Transit will process complaints that are complete.

Once the complaint is received, LIFT Transit will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

LIFT Transit has 60 days to investigate the complaint. If more information is needed to resolve the case, LIFT Transit may contact the complainant. The complainant has 7 business days from the date of the letter to send requested information to the transit director. If the transit director is not contacted by the complainant or does not receive the additional information within 7 business days, LIFT Transit can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the transit director reviews the complaint, she/he will issue 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. A LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of staff member, or other action will occur. If the complainant wishes to appeal the decision, she/he has 30 days after the date of letter or the LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, D.C. 20590.

LIFT Community Action Agency, Inc.
209 North 4th Street, Hugo, OK 74743
Telephone (580) 326-3351 Fax (580) 326-2305
www.liftca.org



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 witness' names and telephone numbers:

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

Please attach documents you have which support the allegation.

Date and sign this form and send it to the LIFT Transit Director (address listed on page 1)

Your Signature

Print Your Name

Date

LIFT Community Action Agency, Inc.
209 North 4th Street, Hugo, OK 74743
Telephone (580) 326-3351 Fax (580) 326-2305
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Attachment 3 - Title VI Self-Survey Form

TITLE VI SELF-SURVEY		
Name of Program:		
Date Filed with ODOT/Transit Programs Division:		
Survey Date:		
Period Covered:		
A. Summary of complaints:		
B. Number of complaints for the period:		
C. Number of complaints voluntarily unresolved:		
D. Number of complaints currently unresolved:		
E. Attach a summary of any type of complaint and provide:		
• Name of complainant:		
• Race:		
• Allegation:		
• Findings:		
• Corrective Action:		
• Identify any policy/procedure changes made as a result of the complaint:		
• Provide the date history: <i>(date complaint received through resolution)</i>		
Distribution of Title VI Information		
1. Are new employees made aware of the Title VI responsibilities pertaining to their specific duties?	YES _____	NO _____

2. Do new employees receive this information via employee orientation?	YES _____	NO _____
3. Is Title VI information provided to all employees and program applicants?	YES _____	NO _____
4. Is Title VI information prominently displayed in the organization and on relevant program materials?	YES _____	NO _____
5. Identify any improvements you have implemented since the last self-survey to support Title VI communication to employees and program applicants:		
6. Identify any improvements you plan to implement before the next self-survey to support Title VI communication to employees and program applicants:		
7. Identify any problems encountered with Title VI compliance, and discuss possible remedies:		
Signature:		
Title:		
Date:		

COPY OF BOARD RESOLUTION

LIFT Community Action Agency, Inc. Board of Directors hereby approves and adopts the LIFT Transit Title VI Program Plan as reviewed during the Board's monthly meeting on October 10, 2023.

David Hawkins 10/10/2023
Board Chairperson Date

Rebecca Porter 10/10/2023
Witness Date