

**CENTRAL OKLAHOMA COMMUNITY ACTION AGENCY**

**DbA: CENTRAL OKLAHOMA TRANSIT SYSTEM**

## **Title VI Program**

Date filed with ODOT Office of Mobility and Public Transit (OMPT):

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## Table of Contents

A. Introduction .....	1
B. Agency Information .....	2
C. Notice to the Public.....	3
D. Procedure for Filing a Title VI Complaint .....	4
E. Monitoring Title VI Complaints, Investigations, Lawsuits <i>and</i> Documenting Evidence of Agency Staff Title VI Training .....	6
F. Public Participation Plan .....	7
G. Language Assistance Plan .....	10
H. Advisory Bodies.....	15
I. Subrecipient Assistance .....	16
J. Subrecipient Monitoring .....	16
K. Equity Analysis of Facilities .....	16
ATTACHMENTS.....	17
Attachment 1 – Agency Information .....	a
Attachment 2 – Title VI Complaint Form .....	b
Attachment 3 - Title VI Self-Survey Form.....	d
Attachment 4 - Title VI Policy Statement .....	f

## A. Introduction

**Central Oklahoma Community Action Agency** 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.

**Central Oklahoma Community Action Agency** 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. **Central Oklahoma Community Action Agency** 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.

**Central Oklahoma Community Action Agency** meets the objectives of the FTA Master Agreement which governs all entities applying for FTA funding, including **Central Oklahoma Transit System** 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 Central Oklahoma Transit System (COTS)

To provide safe and reliable transportation to those we serve.

### 2. History (including year started)

Central Oklahoma Community Action Agency (COCAA) is a 501(c)3 non-profit organization that has been in operation since 1968. COCAA mission is to assist low-income families in need with emergency services and case management in an effort to move them to self-sufficiency.

It operates the Central Oklahoma Transit System (COTS) which has operated since 1998. COTS transportations is an on-demand and response system.

### 3. Regional Profile (regional population; growth projection)

The COTS program provides services in Pottawatomie and Seminole Counties. These two counties have a total population of 96,586 based on data from U.S. Census Bureau QuickFacts. Of this population, 22,909 are under 18 and 16,483 are over 65. The growth projection of these two counties is minimal, but the Shawnee area continues to expand gradually.

### 4. Population served (in relation to regional population)

In 2022, the COTS program provided 14,208 passenger trips. Of these, 2,180 passenger trips were for the elderly population. It provided 4,243 passenger trips to disabled persons. 78% of the passenger trips provided were within the City of Shawnee area.

### 5. Service area (include map, with any routes utilized)

The service area for the COTS transportation program cover Pottawatomie and Seminole Counties. It transports from Pottawatomie and Seminole Counties to Pottawatomie, Seminole, Oklahoma, and Cleveland Counties.

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

The governing body for Central Oklahoma Community Action Agency is made up of 12 board members that live within the agency's six county service area, which includes Cleveland, Lincoln, Logan, Payne, Pottawatomie, and Seminole Counties. COCAA has two board members from each county. The board also has to be a tripartite board that consists of one-third public sector representatives, one-third private sector representatives, and one-third low-income representatives.

### C. Notice to the Public

#### **NOTIFYING the PUBLIC of RIGHTS UNDER TITLE VI CENTRAL OKLAHOMA TRANSIT SYSTEM**

- The CENTRAL OKLAHOMA TRANSIT SYSTEM 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 CENTRAL OKLAHOMA TRANSIT SYSTEM.
- For more information on the CENTRAL OKLAHOMA TRANSIT SYSTEM's civil rights program, and procedures to file a complaint, contact 405-273-3000; email [tlowery@cocaa.org](mailto:tlowery@cocaa.org); or visit our administrative office at 131 N Bell Shawnee, Ok 74802
- 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 21<sup>st</sup> Street, Room 1C1, Oklahoma City, OK 73105-3204.
- If information is needed in another language contact: 405-273-3000  
***Tina Lowery, Central Oklahoma Transit System.***

#### **Locations of Notice to the Public**

The Notice to the Public is placed in all COTS vehicle, posted in the COTS office and breakroom, and located on the Central Oklahoma Community Action Agency website.

## D. Procedure for Filing a Title VI Complaint

### Filing a Title VI Complaint

The complaint procedures apply to the beneficiaries of **Central Oklahoma Transit System's** 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 **Central Oklahoma Transit System** may file a Title VI complaint by completing and submitting the agency's **Title VI Complaint Form**. 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, and in public areas of our agency.

You may download the **Central Oklahoma Transit System** Title VI Complaint Form at **www.cocaa.org**, or request a copy by writing to **131 N. Bell Avenue, Shawnee, OK 74801 or PO Box 486, Shawnee, OK 74802**. Information on how to file a Title VI complaint may also be obtained by calling **Central Oklahoma Transit System** at **(405) 273-3000**.

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 **Tina Lowery at 131 N. Bell Avenue, Shawnee, OK 74801 or PO Box 486, Shawnee, OK 74802**.

COMPLAINT ACCEPTANCE: **Central Oklahoma Transit System** will process complaints that are complete.

Once a completed Title VI Complaint Form is received, **Central Oklahoma Transit System** will review it to determine **Central Oklahoma Transit System** has jurisdiction. The complainant will receive an acknowledgement letter informing them whether or not the complaint will be investigated by **Central Oklahoma Transit System**.

INVESTIGATIONS: **Central Oklahoma Transit System** will generally complete an investigation within 90 days from receipt of a completed complaint form. If more information is needed to resolve the case, **the COTS director** may contact the complainant. Unless a longer period is specified by **the COTS director**, the complainant will have ten (10) days from the date of the letter to send requested information to **Central Oklahoma Transit System** 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 **CENTRAL OKLAHOMA TRANSIT SYSTEM'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. **Central Oklahoma Transit System** 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, **Central Oklahoma Transit System** 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 **the COTS transportation director at 131 N. Bell Avenue, Shawnee, OK 74801**, or at **(405) 273-3000**.

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

See  
Title VI  
Self-Survey Form  
**ATTACHMENT 3**

### Documenting Title VI Complaints/Investigations

All Title VI complaints will be entered and tracked in **Central Oklahoma Transit System's** 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.

**COTS 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

**Central Oklahoma Transit System's** 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?



## 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 then 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 t 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**

**Central Oklahoma Transit System** ensures all outreach strategies, communications and public involvement efforts comply with Title VI. **Central Oklahoma Transit System's** 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, **Central Oklahoma Transit System** 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.

### **2023-2025 Title VI Program Public Participation Process**

**Central Oklahoma Transit Systems will conduct** a Public Participation Process for the **2023-2025** 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.

**Central Oklahoma Transit System will provide** briefings to the Board of Directors and Advisory Bodies.

**Central Oklahoma Transit System will conduct** a 30 day public comment period to provide opportunities for feedback on the **2023-2025** 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 2020-2022 Public Outreach Efforts**

Due to the COVID pandemic, public outreach was limited during this timeframe. Public participation in the COTS program consisted of meetings with local organizations and businesses. In addition, the COTS program receives feedback from clients that are served through the program by completing customer service satisfaction survey and the agency's community needs assessment survey. This effort is ongoing throughout each year.

## F. Language Assistance Plan

### Central Oklahoma Transit System Limited English Proficiency Plan

This limited English Proficiency (LEP) Plan has been prepared to address **Central Oklahoma Transit System'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:**

COTS service area is Pottawatomie and Seminole Counties. The population breakdown of these two counties is as follows: 72% Caucasian, 3% African American, 16% Native American or Alaska Native, 1% Asian, 1% Native Hawaiian or other Pacific Islander, and 6% Hispanic.

**Central Oklahoma Transit System** 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 **Central Oklahoma Transit System**. 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, **Central Oklahoma Transit Systems** 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 **Central Oklahoma Transit System** service area are proficient in the English language. Based on data from 2020 ACS 5 year estimates, **3.8%** of the population five years of age and older speak English "less than very well" – a definition of limited English proficiency

<b>LEP Population in Central Oklahoma Transit System Service Area</b>					
<b>Population 5 years and over by language spoken at home and ability to speak English</b>	<b>Service Area Sector State of Oklahoma</b>	<b>Service Area Sector Pottawatomie County</b>	<b>Service Area Seminole County</b>	<b>Service Area Total</b>	<b>Percentage of Population 5 Years and Older</b>
<b><u>Population 5 Years and Over</u></b>	3,745,034				
Speak English "less than very well"	3.8%	Not Available	Not Available		
<b><u>Spanish</u></b>					
Speak English "less than very well"	36.9%				
<b><u>Other Indo-European</u></b>					
Speak English "less than very well"	20.1%				
<b><u>Asian and Pacific Island</u></b>					
Speak English "less than very well"	46.2%				
<b><u>All Other</u></b>					
Speak English "less than very well"	18.1%				

2. Frequency of Contact by LEP Persons with **Central Oklahoma Transit System's** Services:

The **Central Oklahoma Transit System** staff reviewed the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP persons. To date, **Central Oklahoma Transit System** has, on average, **0 calls** for an interpreter. **Central Oklahoma Transit Systems** averages **1200** phone calls per month.

### LEP Staff Survey Form

**Central Oklahoma Transit System** 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	0
Weekly	0
Monthly	0
Less frequently than monthly	1-2

### 3. The importance of programs, activities or services provided by **Central Oklahoma Transit System** to LEP persons:

Outreach activities, summarized in **Central Oklahoma Transit System'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 **Central Oklahoma Transit System** 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) **Central Oklahoma Transit System** has determined that no language group(s) within its service area meets Safe Harbor criteria requiring written translated “vital documents” by language group(s).

**Central Oklahoma Transit System** will provide assistance and direction to LEP persons who request assistance.

### **Staff LEP Training**

The following training will be provided to **Central Oklahoma Transit System** staff:

1. Information on **Central Oklahoma Transit System** 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 **Central Oklahoma Transit System**’s Title VI Plan requirement.

**Central Oklahoma Transit System** 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 **Central Oklahoma Transit System** 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 **Central Oklahoma Transit System**'s financial resources are sufficient to fund language assistance resources as needed.
6. Determine whether **Central Oklahoma Transit System** has fully complied with the goals of this LEP Plan.
7. Determine whether complaints have been received concerning **Central Oklahoma System System**'s failure to meet the needs of LEP individual.



## G. Advisory Bodies

**Table Depicting Membership of Committees, Councils, By Race**

<b>Committee [examples]</b>	<b>Caucasian</b>	<b>Latino</b>	<b>African American</b>	<b>Asian American</b>		<b>Total</b>
Population Committee	0	0	0	0		100%
Access Committee	0	0	0	0		100%
Citizens Advisory Council	0	0	0	0		100%

**Description of efforts made to encourage minority participation on committees:**

- COTS does not currently have its own separate advisory committee
- COCAA has its twelve member board of directors. COCAA has had a diverse board makeup over the years, which has included Caucasian, African American, Native American and Hispanic. It has also included formerly homeless representatives.

## **H. Subrecipient Assistance**

### **Subrecipient Assistance**

**Central Oklahoma Transit System** does not have any subrecipients.

## **I. Subrecipient Monitoring**

### **Subrecipient Monitoring**

**Central Oklahoma Transit System** does not have any subrecipients.

## **J. Equity Analysis of Facilities**

**Central Oklahoma Transit System** has not constructed any storage facilities, maintenance facilities, or operations centers in the last three years.

## **ATTACHMENTS**

## Attachment 1 – Route Map

**Route 63-01** – Pottawatomie County

**Route 63-12** – Seminole County

**Route 63-10** – Pottawatomie or Seminole County into Oklahoma County



## Attachment 2 – Title VI Complaint Form

### TITLE VI COMPLAINT FORM – Central Oklahoma Transit System (COTS)

Central Oklahoma Transit System is committed to ensuring that no person is excluded from participation in or denied the benefits of its service on the basis of race, color, or national origin, as provided by the Title VI of the Civil Rights Act of 1964, as amended. The Title VI complaints must be filed within 180 calendar days from the date of the alleged discrimination.

Date of Filing: \_\_\_\_\_  
Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
City, State, Zip Code: \_\_\_\_\_  
Work Phone: \_\_\_\_\_  
Home Phone: \_\_\_\_\_  
E-mail Address: \_\_\_\_\_

Complaint can be sent to:  
Central Oklahoma Transit System  
Attn: COTS Director  
PO Box 486  
Shawnee, OK 74802-0486  
Phone: (405) 273-3000  
Fax: (405) 214-4326

Indicate on what ground(s) you believe you have been discriminated against (check all that apply):

\_\_\_\_\_ Race      \_\_\_\_\_ Color      \_\_\_\_\_ National Origin

Indicate the person(s) who you believe discriminated against you:

Name: \_\_\_\_\_  
Work Location (if known): \_\_\_\_\_  
Work Phone: \_\_\_\_\_  
Date of alleged incident: \_\_\_\_\_

If you have an attorney representing you concerning the matters raised in this complaint, please provide the following:

Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
Work Phone: \_\_\_\_\_  
E-mail address: \_\_\_\_\_

Explain why you believe discrimination has occurred. If there are witnesses, please provide names, addresses, and telephone numbers. Be sure to include how other persons were treated differently than you. Attach additional pages as necessary and any written material pertaining to your case.

What remedy are you requesting? Please be specific.

Have you filed or do you intend to file a charge or complaint concerning the matters raised in this complaint with any other agencies (Federal, State, or local): \_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, please provide the following information:

Agency: \_\_\_\_\_

Address: \_\_\_\_\_

Name of Investigator (if known): \_\_\_\_\_

Phone Number: \_\_\_\_\_

E-mail Address: \_\_\_\_\_

Date Filed: \_\_\_\_\_

State of case: \_\_\_\_\_

I confirm that I have read the above charge(s) and it is true to the best of my knowledge.

Print or type name of complainant: \_\_\_\_\_

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

***Completed forms must be submitted to the Central Oklahoma Transit System Director.  
If you require any assistance in filling out this form, please contact the COTS Director at (405) 273-3000.***

Central Oklahoma Transit System ensures that no person or groups of persons shall, on the grounds of race, color, sex, religion, national origin, age disability, retaliation or genetic information, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any and all programs, services, or activities administered by Central Oklahoma Transit System, its recipients, sub-recipients, and contractors.

### Attachment 3 - Title VI Self-Survey Form

<b>TITLE VI SELF-SURVEY</b>		
<b>Name of Program:</b>	<b>Central Oklahoma Transit System (COTS)</b>	
<b>Date Filed with ODOT/Transit Programs Division:</b>	8/1/2023	
Survey Date:	8/1/2023	
Period Covered:	October 1, 2021 – September 30, 2022	
A. Summary of complaints:	No complaints filed	
B. Number of complaints for the period:	0	
C. Number of complaints voluntarily unresolved:	0	
D. Number of complaints currently unresolved:	0	
E. Attach a summary of any type of complaint and provide:	No complaints filed	
• Name of complainant:	n/a	
• Race:	n/a	
• Allegation:	n/a	
• Findings:	n/a	
• Corrective Action:	n/a	
• Identify any policy/procedure changes made as a result of the complaint:	n/a	
• Provide the date history: <i>(date complaint received through resolution)</i>	n/a	
<b>Distribution of Title VI Information</b>		
1. Are new employees made aware of the Title VI responsibilities pertaining to their specific duties?	YES <u>  X  </u>	NO <u>      </u>

2. Do new employees receive this information via employee orientation?	YES <u>  X  </u>	NO <u>      </u>
3. Is Title VI information provided to all employees and program applicants?	YES <u>  X  </u>	NO <u>      </u>
4. Is Title VI information prominently displayed in the organization and on relevant program materials?	YES <u>  X  </u>	NO <u>      </u>
5. Identify any improvements you have implemented since the last self-survey to support Title VI communication to employees and program applicants:	No improvements have been implemented.	
6. Identify any improvements you plan to implement before the next self-survey to support Title VI communication to employees and program applicants:	No improvements have been planned.	
7. Identify any problems encountered with Title VI compliance, and discuss possible remedies:	No problems encountered.	
Signature: Tina Lowery		
Title: COTS Director		
Date: 8/1/2023		



## Attachment 4 - Title VI Policy Statement

### Title VI Policy Statement

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin in all federally assisted programs. Title VI was amended by the Civil Rights Restoration Act of 1987 (P.L. 100 – 259), effective as of March 22, 1988, which added Section 606, expanding the definition of the terms “programs or activities” to include all of the operations of an educational institution, government entity, or private employer that receives federal funds if any one operation receives federal funds.

The Central Oklahoma Community Action Agency (COCAA) is a non-profit 501(c) entity. It is the policy of COCAA to ensure compliance with Title VI of the Civil Rights Act of 1964 and all related statutes or regulations in all programs and activities.

The Title VI Coordinator is granted the authority to administer and monitor the Title VI and Nondiscrimination Program as promulgated under Title VI of the Civil Rights Act of 1964 and any subsequent legislation. The Title VI Coordinator will provide assistance as needed.

The agency will take all steps to ensure that no person or groups of persons shall, on the grounds of race, color, and national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any and all programs, services, or activities administered by COCAA, its recipients, sub-recipients, and contractors.

Title VI responsibilities are delegated to the managers and charges them with the responsibility to develop and implement procedures and guides to adequately monitor their programs.

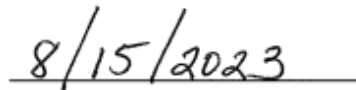
The agency recognizes the need for continuous Title VI training for COCAA personnel.

Anyone who believes that he or she has been discriminated against should contact the COCAA Title VI Coordinator, the COTS Director, at 405-273-3000.



Lee Doolen, Board Vice Chair

Central Oklahoma Community Action Agency



Date