



**Public Transportation
Title VI Program
of the
1964 Civil Rights Act**

City of Norman

Submitted in Compliance with:
FTA Circular 4702.1B
(Effective October 1, 2012)

February 1, 2020

Submitted by:

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Introduction

The City of Norman (CON) is a direct recipient of Federal Transit Administration (FTA) funds and is required to submit a Title VI Program once every three years to document compliance with Title VI regulations as given in Title 49 CFR part 21. This will be CON's first Title VI Program as it relates to public transportation.

Title VI of the Civil Rights Act prohibits discrimination on the basis of race, color, or national origin in programs or activities receiving federal financial assistance. Presidential Executive Order 13166 addresses services to those individuals with limited English proficiency, and Presidential Executive Order 12898 addresses environmental justice for minority and low-income populations. CON is committed to providing public transportation services in a nondiscriminatory manner and complying with Title VI as well as the Executive Orders for Limited English Proficiency and Environmental Justice. To ensure this goal, CON will prepare an updated Title VI Program every three years. The Title VI Program also includes a Limited English Assistance Plan and a Public Participation Plan that engages all population groups served by CON, including minority and low-income populations.

Section I: General Reporting Requirements

A. Title VI Notice to the Public

CON is committed to implementing the Title VI Program and ensuring that CON operates without discrimination as described in the Title VI regulations. CON's Title VI Notice to the Public is posted in public areas of CON's offices, on all CON revenue vehicles, and on the CON website. The public notification is posted in both English and Spanish as shown below and in Appendix A.

Notifying the Public of Rights under Title VI City of Norman (CON) Public Transportation

- The City of Norman operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. If you believe you have been wronged by any unlawful discriminatory practice under Title VI, you may file a written complaint with the City at City of Norman Title VI Officer, ATTN Public Works, P.O. Box 370, Norman, OK 73070.
- For more information on the City's Title VI complaints procedure and form, visit our website, www.normanok.com.
- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights at the following address: Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.
- If you need information in another language, contact 405-217-7761.

Notificación al público sobre los derechos en virtud del Título VI

- La Ciudad de Norman administra sus programas y servicios sin distinción de raza, color ni nacionalidad conforme al Título VI de la Ley de Derechos Civiles. Si considera que ha sido perjudicado a causa de algún acto discriminatorio ilegal en virtud del Título VI, puede presentar una demanda por escrito ante la Ciudad enviándola a City of Norman Title VI Officer, ATTN Public Works, P.O. Box 370, Norman, OK 73070
- Si desea obtener más información acerca del formulario y los procedimientos de demandas del Título VI de la COTPA, visite nuestro sitio web www.normanok.gov.
- Un demandante puede presentar una queja directamente ante la Administración Federal de Tránsito presentando una queja ante la Oficina de Derechos Civiles en la siguiente dirección: Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.
- Si desea obtener la información en otro idioma, llame al 405-217-7761.

B. Title VI Complaint Form and Procedures

CON has established Title VI Complaint Procedures that include all complaints under Title VI of the Civil Rights Act of 1964, Executive Order 12898 "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations" (1994), and Executive Order 13166 "Improving Access to Services for Persons with Limited English Proficiency" (2000). These procedures along with the complaint form are posted on the CON website in both English and Spanish.

An individual who believes he or she has been discriminated against on the basis of race, color, or national origin may file a complaint within 180 days of the alleged incident. Once CON receives the written complaint, the office has ten (10) working days to acknowledge receipt, and fifteen (15) days to determine whether the complaint warrants a Title VI investigation. Once a decision is made, CON has five (5) days to notify the complainant in writing. All details of the Title VI complaint procedures and the Title VI complaint form are shown in Appendix B.

A complainant may also file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights at the following address: Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

C. Title VI Investigations, Complaints, or Lawsuits

CON maintains a log of Title VI investigations, complaints, or lawsuits. To date, none have been received.

D. Public Participation Plan

CON has a public participation process in place to ensure that all population groups, including minority and low-income populations, within the City of Norman are given opportunities to comment on transit-related activities. Targeted public participation efforts include minority populations, low-income populations, and persons with disabilities. This process has been added to CON's Public Participation Plan and is shown in Appendix C.

This public participation process is used to keep customers and the Norman community informed about CON transit services and an opportunity to participate in planning transit changes.

E. Language Assistance Plan

CON completed a Limited English Proficiency (LEP) Four Factor Analysis to create its Language Assistance Plan. The Plan is included in Appendix D and summarized here. This plan will allow

CON to ensure that persons with limited English proficiency have access to our services and to public participation opportunities.

CON conducted an LEP analysis and identified one language group — Spanish speaking persons -- that exceeded the Safe Harbor Provision threshold set by FTA. The 2015 American Community Survey of the U.S. Census Bureau showed that of the 7,348 persons who speak Spanish at home, an estimated 2,413 speak English less than very well. The Census data also showed which census tracts in the City of Norman had the most concentration of individuals who speak Spanish at home and speak English less than “very well.” CON has three bus routes that serve these areas – 10-Main St, 12-Lindsey West, and 21-Alameda/E. Norman.

Since this group exceeds the 1,000-person threshold, CON developed a language assistance plan to address these needs. CON will update its LEP analysis periodically to identify any other groups that may exceed this threshold in the future.

F. Membership of Non-Elected Committees and Councils

CON has no non-elected committees or councils that make transit planning decisions. All policy decisions for transit service are made by the City Council. Some items are discussed in the City of Norman Community Planning and Transportation Committee, however, that is subcommittee of City Council and is made up of City Councilmembers.

G. Monitoring of Subrecipients

CON has no subrecipients; however, in the event that CON should have subrecipients, the following monitoring procedures would be used to comply with Title VI:

Grant Management:

- Ensure that agreements with subrecipients contain all required federal documents and clauses, including sample notices to the public informing them of their rights under Title VI, sample procedures on how to file a Title VI complaint, sample procedures for tracking and investigating Title VI complaints and information regarding expectations for notification from the subrecipient to CON when a Title VI complaint is received.
- Require that subrecipients provide CON with Federal Funding Accountability and Transparency Act (FFATA) information.
- Require that subrecipient provide a copy of its Title VI policy and plan, if required.
- Maintain copies of CON’s agreement/contract with subrecipient, FFATA form, Title VI policy, and Title VI plan, if required in the official grant file.
- Require that subrecipient submit an annual copy of its A-133 audit report or other financial documentation as required.

Project Management:

- Maintain ongoing communication with subrecipient and manage subrecipient agreement/contract and approve invoices.
- Perform periodic unannounced inspections of the system routes and facilities
- Monitor subrecipient progress and report same on FTA quarterly milestone progress reports.
- Gather documents from subrecipients to ensure they are complying with Title VI, if applicable. Require subrecipient to submit copies of all complaints and review to ensure that all Title VI complaints are addressed properly.

H. Title VI Equity Analysis of Constructed Facilities

CON has not constructed any facilities included in this provision, such as storage facilities, maintenance facilities, operations centers, etc. during the past 3 years.

I. Documentation of Approval of Title VI Program

The governing body responsible for policy decisions for the City of Norman is the City Council. The 2020 Title VI Program for City of Norman Public Transportation has been reviewed and approved by the City Council as shown in Appendix E.

Section II: Standards and Policies for Fixed Route System-wide Service

A. Standards and Policies for Fixed Route System-wide Service

The following describes each mode of service and how service is distributed across the transit system. CON applies the same standards and policies for all of its service and does not discriminate on the basis of race, color, or national origin.

1. Vehicle Load

The average of all loads during peak operating periods should not exceed vehicle capacity. Please see vehicle capacities below.

Vehicle Type	Average Passenger Capacities		
	Seated	Standing	Total
26' Standard Minibus	19	9	28
29' Standard Minibus	22	15	37
30' Low Floor Bus	25	22	47
35' Low Floor Bus	33	19	52
40' Low Floor Bus	36	18	54

2. Vehicle Headways

CON operates Monday through Friday 7 am to 10 pm and does not operate on weekends. CON operates only within the City of Norman with the exception of the Commuter Express route to Oklahoma City and the Limited Service route to the Social Security Office in Moore. CON maintains the same headways/frequency of service for the Hourly and Local service throughout the day. Commuter Express operates only 4 hours in the morning peak and 4 ½ hours in the afternoon peak. Limited service to the Social Security office is provided only two days a week to meet the limited demand for this service.

Service	Headway/Frequency (minutes)			Days of Service	Hours of Service/Day
	Peak*	Off Peak	Evening**		
<i>Weekday</i>					
Hourly	60	60	60	5	15
Local	30	30	30	5	15
Commuter Express	3 trips am/3 trips pm	--	--	5	8.5
Limited Service	--	2 trips only	--	2	2

*Peak Service operates 6 – 10 am and 2 – 6:30 pm

**Evening service is 6:30 – 10 pm.

“—“ No service is provided during this period.

3. On-Time Performance

A vehicle is considered on time when it departs each bus stop no earlier than the scheduled time and no later than 5 minutes after the scheduled time. CON’s goal for on-time performance is 75 percent or greater. CON uses AVL to continuously monitor on-time performance.

4. Service Availability

CON provides transit service within the urban core area of the City of Norman bounded by 36th Avenue NW/SW, Tecumseh Road, 12th Avenue NE/SE, and Lindsey Street. Within this service area CON distributes transit service so that 75 percent of all residents are within ½ mile of fixed route bus service. Bus stops are evenly distributed along each bus route.

5. Distribution of Transit Amenities

Installation of benches, shelters, or other bus stop amenities are based on the number of passengers boarding a particular stop. Each year, CON will review the locations of existing amenities and identify where new amenities are needed. Based on available funding, CON will prepare a plan to add improvements equitably among minority and non-minority populations.

6. Vehicle Assignment

CON does not assign vehicles to a particular route or type of service based on vehicle age or other factors. Vehicles are assigned to a particular route based on the vehicle capacity, ridership demand, and operating characteristics (such as tight turns).

Appendix A

Notifying the Public of Rights under Title VI

City of Norman (CON) Public Transportation

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- For more information on the City's Title VI complaints procedure and form, visit our website www.normanok.com.
- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights at the following address: Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.
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- Si desea obtener la información en otro idioma, llame al 405-217-7761.

Appendix B

City of Norman Title VI Complaint Procedures

The following procedures cover all complaints under Title VI of the Civil Rights Act of 1964, Executive Order 12898 "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations" (1994), and Executive Order 13166 "Improving Access to Services for Persons with Limited English Proficiency" (2000), for alleged discrimination in any program or activity administered by the City of Norman.

The following measures will be taken to resolve Title VI complaints:

1. A formal complaint must be filed within 180 days of the alleged occurrence. The complainant or his/her representative shall complete and sign the City of Norman Title VI Complaint Form. A statement detailing the facts and circumstances of the alleged discrimination must accompany each complaint.
 - If a complainant is unable to provide a written statement, a verbal complaint of the alleged discrimination may be made to the City of Norman Title VI Coordinator who will interview the complainant and assist the complainant in converting the verbal allegations to writing.
2. Within ten (10) working days of receiving a complaint, the Title VI Coordinator will notify the complainant in writing that the complaint was received.
 - If a complaint is incomplete, the Title VI Coordinator will request that the complainant submit additional information within thirty (30) days. Failure to do so may be considered good cause for a determination of no investigative merit.
3. Within fifteen (15) working days from receipt of a complete complaint, the City of Norman Title VI Coordinator will determine whether the complaint has sufficient merit to warrant investigation as a Title VI complaint and within five (5) working days of this decision, City of Norman will notify the complainant in writing whether it will pursue a Title VI investigation.
 - If the decision is not to investigate as a Title VI complaint, the notification shall specifically state the reason for the decision.
4. If the complaint has investigative merit, a complete investigation will be conducted, and an investigative report will be completed within sixty (60) days from receipt of the complaint. The Title VI Coordinator shall send either a closure letter (summarizing the allegations and stating that there was not a Title VI violation and that the case will be closed) or a letter of finding (LOF) to the complainant that will include:
 - The report will include a narrative description of the incident, summaries of all persons interviewed, a finding with recommendations for remedial steps as appropriate and necessary. The remedial steps, if any, will be implemented as soon as practicable. The complainant will receive a copy of the final report together with any remedial steps.

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- The complainant shall also be notified of his/her right to appeal the decision within 30 days after the date of the closure letter or LOF.
5. When City of Norman receives a written appeal of the Title VI complaint decision, an appeal hearing committee consisting of five (5) individuals will convene within 30 days of the receipt of the appeal. The hearing committee will consist of two (2) riders of the appropriate City of Norman service, one of which is disabled and one with no apparent disability; the City of Norman City Manager or his/her designee; the Director of the Public Works (ADA Coordinator); and Legal Counsel for the City of Norman.
 - City of Norman will notify the appellant in writing of the date, time and location of the hearing utilizing U.S. Postal Service certified mail with return receipt of delivery required.
 6. The outcome of the appeal hearing will be mailed to the appellant via the U.S. Postal Service utilizing certified mail with return receipt of delivery required.

The Title VI Coordinator shall maintain a log of Title VI complaints received from this process. The log shall include the date the complaint was filed, a summary of the allegations, the status of the complaint, and actions taken by City of Norman in response to the complaint. Should City of Norman receive a Title VI complaint in the form of a formal charge or lawsuit, City of Norman's legal counsel shall be responsible for the investigation and maintaining a log as described above.

A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights at the following address: Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

If you need information in another language, contact 405-217-7761.

Si desea obtener la información en otro idioma, llame al 405-217-7761.

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**Title VI Complaint Form
City of Norman**

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

The following information is necessary to assist us in processing your complaint. If you require assistance in completing this form, please contact the Title VI Coordinator (405.217.7761). The completed complaint form must be signed and returned to: City of Norman, Transit - Title VI Coordinator, P.O. Box 370, Norman, OK 73070. City of Norman will send a written acknowledgement of the complaint within 10 working days.

Complainant Contact Information (Person Discriminated Against)				
Name:				
Mailing Address:				
City:			State:	Zip Code:
Day Phone:		Evening Phone:		
Email Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
Person Discriminated Against (if someone other than complainant)				
Name				
Mailing Address:				
City:			State:	Zip Code:
Please identify your relationship to the person for whom you are complaining and 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.			Yes	No

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Names and contact information of witnesses		
Witness 1:		Phone:
Mailing Address		Email Address:
City:	State:	Zip Code:
Witness 2:		Phone:
Mailing Address		Email Address:
City:	State:	Zip Code:
Have you previously filed a Title VI complaint with the City of Norman? (Circle one) Yes/No If yes, list the date(s) of any prior complaints.		
Did you file this complaint with another federal, state, or local agency? (Circle one) Yes/No If yes, list the name of the agency (agencies) and contact information.		
Agency:		Contact Person:
Mailing Address:		Phone:
City:	State:	Zip Code:
Agency:		Contact Person:
Mailing Address:		Phone:
City:	State:	Zip Code:
I affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.		
Signature and date are required. Attach any documents that support your complaint.		
Complainant's Signature		Signature Date
Date City of Norman Received:	Date Received by Title VI Coordinator:	
	Signature:	

Appendix C

City of Norman Public Transit Public Participation Plan

Following are the official procedures for public participation requirements of the City of Norman. The public participation process is required in the event of a fare increase or a major cut in services. The public participation process is also important to keep customers and community residents informed about the City of Norman Public Transit service and transit-related planning. Section 1 describes the public hearing requirements. Section 2 describes the process for holding public hearings. Section 3 describes public outreach tools to engage minority, limited English proficient (LEP), and low-income populations.

Section 1 – Public Hearing Requirements

Public hearings will be required in each of the following circumstances:

- A fare increase is proposed.
- A system-wide cut of 10% or more in revenue hours is proposed.
- A proposed system-wide alteration of 10% or more in revenue hours which leaves an area no longer served or poorly served.
- A proposed route elimination or a cut of 25% in revenue hours on a route.
- A proposed cut of 25% or more of the service area of a route altering it in a way which leaves a population no longer or poorly served.

Section 2 – Public Hearing Process

Regulations governing public hearings:

- In the event of a fare increase or major service change, as described above, no fewer than two public hearings will be held regarding the proposed changes.
- The public is to be notified of pending public hearings no less than 15 days prior to the hearing, and public hearings are to be completed 15 days before a decision on service changes is made.
- Public notification is required through flyers on affected routes or system-wide in the case of a fare change and is required to be published as a legal notice in *The Norman Transcript*.
- Groups and/or organizations representing minority and low-income populations (Environmental Justice populations) will be identified and sent notices to ensure that minority and low-income populations receive notice of the public hearing and have an opportunity to voice their concerns.
- Likewise, staff will notify groups and/or organizations representing persons with limited English proficiency and send notices to these groups to ensure that persons with limited English proficiency receive notice of the public hearing and have an

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- opportunity to voice their concerns.
- All public notices shall be published in both English and Spanish as described in the City of Norman's Language Assistance Plan. Other languages will also be considered when the language groups reach the threshold set by FTA.
- Public hearings will allow time for City of Norman staff to explain the proposed changes and time for the public to ask questions and add comments. If time constraints do not allow all individuals present the opportunity to make comment, other means of addressing comments will be made available and announced at the hearing. Also, individuals who are unable to attend the public hearings will be given an opportunity to submit their comments in writing by postal mail, email, or through the City of Norman website. Individuals may also contact the City of Norman in person or by phone to submit comments. All comments received by the City of Norman before the public hearing will be added to the official public hearing record.
- Staff will document public comments and consider all comments when recommending final service changes to City Council.
- All public meetings to discuss public transit service will be held in an ADA accessible location, and the public hearing notice will give individuals an opportunity to request special accommodations, including a request for a sign interpreter. Persons requiring special accommodations for a disability must notify the City of Norman 48 hours ahead of the public meeting date.

Section 3 – Public Outreach Tools to Include Minority, Low-Income, LEP populations as well as persons with disabilities

The City of Norman has developed a set of public outreach tools designed to ensure public participation among all population groups while at the same time ensuring that the City of Norman complies with Title VI of the Civil Rights Act, Executive Order 12898, Executive Order 13166, the Americans with Disabilities Act (ADA), and other related regulations. The City of Norman will use these tools to improve public participation among City of Norman customers as well as other potential customers within the Norman community. Special attention will be given to ensure that the City of Norman engages persons from minority, low-income, LEP populations, as well as persons with disabilities.

Public Outreach Tools:

- City of Norman website and publications – Through its operator, EMBARK, the City of Norman maintains current information about its transit services at the following website (www.embarkok.com/norman). The City of Norman also maintains current information at its website www.normanok.gov.
- Social Media - In addition to the website, EMBARK and the City of Norman use social media to expand its outreach efforts and provide updates of activities and encourage public participation from riders and other interested individuals regarding the City of Norman's service.

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- Public Meetings -
 - **Public Hearings:** The City of Norman holds public hearings whenever there is a fare increase or major service change. The public is given an opportunity to request special accommodations for information to be provided in alternate formats. All notices of the public meetings are published in both English and Spanish in the local newspaper.
 - **City of Norman Community Planning and Transportation Committee (CPTC):** City of Norman Council holds a monthly CPTC meeting to discuss transportation related items. Staff present a report on transit ridership and other transit activities at this meeting. The CPTC is a subcommittee of Norman City Council, where items can be discussed before going before the full Council. All CPTC meetings are public meetings and can be attended by the community.
 - **City of Norman Citizens ADA Advisory Committee:** The City of Norman formed a Citizens ADA Advisory Committee to aid in informing and making recommendations to staff and Council regarding accessibility issues and improvements. All meetings are public meetings and can be attended by the community.
 - **Citizen ADA Public Transportation Subcommittee:** The Citizen ADA Transportation Subcommittee was created out of the Citizens ADA Advisory Committee to discuss transit related accessibility issues and make recommendations to the City of Norman ADA Advisory Committee. All meetings are public meetings and can be attended by the community.
 - **Open Houses:** To receive community input on transit service, the City of Norman may hold open houses alone or in conjunction with other community planning events to share information about City of Norman service and to receive comments from the public on City of Norman service. These meetings are typically held using an open house forum to encourage more participation from the community.
- Meetings with Community Organizations - City of Norman will meet with various community organizations and groups periodically as specific needs arise to distribute transit-related information or to solicit comments regarding transit planning activities. These groups include United Way, Food and Shelter for Friends, Norman Housing Authority, Center for Children and Families, Inc., and others.
- Printed Notices - City of Norman routinely posts notices on its buses, at City of Norman transfer station, and in community buildings (libraries, City Hall, etc.) to keep its customers and the community informed of upcoming meetings and service changes.
- Customer Service Phone Line - City of Norman Action Center answers questions daily for our City of Norman customers and provides trip planning assistance as requested. In addition, City of Norman's contractor, EMBARK, also answers questions of customers.
- ACOG's Public Participation Plan (PPP) - City of Norman is a member of the

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Association of Central Oklahoma Governments (ACOG), and ACOG's PPP includes City of Norman as well as other members of ACOG. City of Norman utilizes ACOG's PPP to supplement and strengthen its own Public Participation Plan. City of Norman keeps ACOG informed of its transit planning activities through the Transit Improvement Program (TIP). ACOG provides City of Norman additional tools to keep the community informed of transit planning efforts.

Non-Discrimination Policy

It is the policy of the City of Norman that no person or groups of persons shall on the grounds of race, color, religion, ancestry, national origin, age, place of birth, sex, sexual orientation, gender identity or expression, familial status, marital status, including marriage to a person of the same sex, disability, retaliation, or genetic information, be excluded from participation in, be denied the benefits of, or otherwise subjected to discrimination in employment activities or in all programs, services, or activities administered by the City, its recipients, sub-recipients, and contractors. In the event of any comments, complaints, modifications, accommodations, alternative formats, and auxiliary aids and services regarding accessibility or inclusion, please contact the ADA Technician at 405-366-5424, Relay Service: 711. To better serve you, five (5) business days' advance notice is preferred.

Appendix D

City of Norman Public Transportation Limited English Proficiency Plan

Introduction

This Limited English Proficiency (LEP) Plan has been prepared to address City of Norman (CON) 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 and 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, "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 agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds, including the City of Norman (CON).

City of Norman (CON) has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with LEP who wish to access services provided. 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, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

Appendix D

LEP Four Factor Analysis

To prepare this plan, City of Norman (CON) used the four-factor LEP analysis which considers the following factors:

- 1. The number or proportion of LEP persons eligible to be served or likely to be encountered by City of Norman (CON) services.**

To evaluate limited English proficiency in Norman, CON reviewed available American Community Survey (ACS) estimates provided by the U.S. Census Bureau for 2015. The ACS is the Census Bureau's Population Estimates Program that provides additional population statistics not readily available with the official decennial census counts. The table below shows a 2015 estimate of languages spoken at home in Norman for persons five years and older. Spanish is the most significant language other than English spoken at home in Norman, with 4.3 percent of persons five years and older speaking that language at home. The second highest is Chinese with 1.4 percent of persons five years and older speaking that language at home.

Of these languages below the three highest that speak English less than "very well" include Spanish, Chinese, and Laotian:

- Of the 4,792 speaking Spanish at home, an estimated 1,479 (1.33%) speak English less than "very well."
- Of the 1,513 speaking Chinese at home, an estimated 749 (0.68%) speak English less than "very well."

The data below was able to be mapped at the census tract level for those that speak Spanish at home and speak English less than "very well." Those census tracts that had 102 or more individuals that cannot speak English "very well" are currently served by routes 10-Main St, 12-Lindsey West, and 21-Alameda/E. Norman.

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**LEP ASSESSMENT, American Community Survey (2011-2015), Norman, Oklahoma
LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POP. 5 YEARS AND OVER**

Language	Total	% of the Total Population	Speaks English Less than Very Well	% of LEP Individuals
Population 5 years and over	110,924			
Speak only English	98,936	89.19%		
Spanish or Spanish Creole	4,792	4.32%	1,479	1.33%
French (incl. Patois, Cajun)	577	0.52%	56	0.05%
French Creole	-	0.00%	-	0.00%
Italian	44	0.04%	8	0.01%
Portuguese or Portuguese Creole	55	0.05%	-	0.00%
German	565	0.51%	44	0.04%
Yiddish	-	0.00%	-	0.00%
Other West Germanic languages	196	0.18%	69	0.06%
Scandinavian languages	70	0.06%	15	0.01%
Greek	28	0.03%	-	0.00%
Russian	54	0.05%	-	0.00%
Polish	103	0.09%	-	0.00%
Serbo-Croatian	17	0.02%	-	0.00%
Other Slavic languages	84	0.08%	-	0.00%
Armenian	9	0.01%	-	0.00%
Persian	189	0.17%	-	0.00%
Gujarathi	-	0.00%	-	0.00%
Hindi	-	0.00%	-	0.00%
Urdu	127	0.11%	68	0.06%
Other Indic languages	177	0.16%	53	0.05%
Other Indo-European languages	164	0.15%	25	0.02%
Chinese	1,513	1.36%	749	0.68%
Japanese	166	0.15%	81	0.07%
Korean	495	0.45%	144	0.13%
Mon-Khmer, Cambodian	74	0.07%	22	0.02%
Hmong	19	0.02%	6	0.01%
Thai	50	0.05%	20	0.02%
Laotian	159	0.14%	159	0.14%
Vietnamese	665	0.60%	138	0.12%
Other Asian languages	500	0.45%	164	0.15%
Tagalog	117	0.11%	-	0.00%
Other Pacific Island languages	248	0.22%	113	0.10%
Navajo	-	0.00%	-	0.00%
Other Native North American languages	113	0.10%	32	0.03%
Hungarian	16	0.01%	-	0.00%
Arabic	282	0.25%	25	0.02%
Hebrew	-	0.00%	-	0.00%
African languages	304	0.27%	18	0.02%
Other and unspecified languages	16	0.01%	-	0.00%

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2. The frequency with which LEP persons come into contact with City of Norman (CON) transit services.

LEP persons are persons identified as speaking English less than very well, not well, or not at all.

The summary below discusses the frequency with which City of Norman staff, and/or its contractor/lessee come into contact with LEP persons. It also provides information on the how staff is instructed to meet the needs of LEP persons. City of Norman staff persons are encouraged to use LEP resource materials to assist LEP persons.

- City of Norman staff could come into contact with LEP persons when they are requesting information regarding the service. This could be over the phone, through email, or in person visits.
- City of Norman's contractor could come into contact with LEP persons while operating the vehicles and providing the service.

3. The nature and importance of the program, activity, or services provided by City of Norman (CON) to people's lives.

Access to public transportation is an important service for all persons, including LEP persons, who need transportation to carry out their day-to-day activities. CON's most critical services are its fixed route bus service and ADA paratransit service. CON's service ensures that all riders have transportation for their employment, education, health care, and personal needs.

It is important that language does not create a barrier in riding public transportation in the City of Norman. Critical information that CON provides which can affect access includes:

- Route and schedule information
- Fares
- System rules
- Information on how to ride CON
- Safety, security, and public service announcements
- Complaint/commendation forms and procedures
- Information about ADA paratransit services

4. The resources available to City of Norman (CON) for LEP outreach, as well as the costs associated with that outreach.

CON currently provides the following language assistance measures:

- CON's Title VI public notification is posted on all buses and printed in both English and Spanish.
- All manufacturer installed signage in Spanish in all buses purchased.

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- CON staff attends an annual International Student Services Orientation meeting on the University campus every August. At the meeting, a general overview of transit services is presented.
- Ensure that CON's staff and contractor receive training on Title VI and LEP principles.

The cost of these measures has been estimated to be less than \$500 annually.

Based on the Four Factor Analysis, our research shows that in the City of Norman (CON) service area, we exceed the minimum requirement of 5% or 1,000 individuals, whichever is less. Therefore, an LEP Plan is required. Listed below are the resources used to obtain this information.

Resources:

American Community Survey

<http://www.census.gov>

American Fact Finder

<http://www.factfinder2.census.gov>

Appendix D

Improving Access for People with Limited English Proficiency (LEP) Language Assistance Plan

City of Norman (CON) has approved the following implementation plan to meet the requirements of Title VI of the Civil Rights Act of 1964. With this plan, CON will work to improve access to its services for persons with limited English proficiency (LEP). The goal of this implementation plan is to ensure that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

Task 1. Identifying LEP individuals who need language assistance.

The guideline for determining whether there is a significant number of LEP persons in a language group to warrant the need for translating vital written documents is 5% or 1,000 persons. Results of the four-factor analysis show that there is a significant number of Spanish speaking persons with limited English proficiency living in Norman. Of the city's population five years and older (110,924), a total of 3,488 (3.14%) are persons with limited English proficiency. Spanish was the only group of LEP persons to meet the threshold at this time with 1,479 (1.33%).

In the future, if the City of Norman meets the threshold for any other language group, it will provide written translation of vital documents in such languages and consider measures needed for oral interpretation.

Task 2. Language assistance measures

At this time, Spanish is the only language required for the LEP Plan. The following resources will be used to provide language assistance:

Written Language:

- OU Department of Modern Languages, Literatures, and Linguistics.

Oral Language:

- OU Department of Modern Languages, Literatures, and Linguistics

Assistance for CON Administrative Staff. CON has developed a working relationship with the OU Department of Modern Languages, Literatures, and Linguistics to receive both written and oral translation assistance. When CON receives a call or visit from a Spanish speaking customer with limited English proficiency, or another language, CON staff will contact the department above.

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The contacts above will also assist in translating any Spanish or Chinese written communication into English for CON staff and preparing translations of CON's response to the LEP person. When written communication is received, CON staff will forward the communication to the CON Language Liaison who will forward it to the contacts above.

The CON Language Liaison will develop specific guidance for CON Administrative Staff and provide support resources necessary to assist LEP persons.

Assistance for CON Operators. When operating the bus and assisting riders with limited English proficiency, operators will use visual tools, such as maps and timetables, to help riders identify bus routes, bus stops, and bus schedules. Operators will also work with other riders who speak both English and the native language of LEP riders to answer specific questions about the CON service. For other translation assistance, operators will be encouraged to contact the CON Language Liaison.

The CON Language Liaison will develop specific guidance for CON Operators and provide support resources necessary to assist LEP persons.

CON, working with the OU Department of Modern Languages, will establish policies to ensure a competent translation service. These policies will include:

- Asking the translator to demonstrate accurate translation and communication skills in both English, Spanish, and any other language CON deems appropriate to service its LEP population.
- Training the translator in any specialized terms associated with CON service.
- Ensuring that the translator does not deviate from the role as translator. For example, the translator should not serve as a counselor, legal advisor, or other role when providing translation services.
- Request that the translator attest that he/she does not have a conflict of interest on issues relative to translation services.

Task 3. Training Staff

City of Norman transit employees are oriented on the principles of Title VI and the City of Norman's Language Assistance Plan. New employees will be provided guidance on the needs of clients served and how best to meet their needs. The City of Norman will ensure its contractor, as applicable, also educates its staff on Title VI requirements, and specifically LEP provisions.

If a driver, dispatcher or employee needs further assistance related to LEP individuals, they will work with the City of Norman's and/or our contractor's Transit Manager to identify strategies to meet the language needs of the participants of the program or service.

As part of our ongoing meetings, the City of Norman will discuss with our transit contractor,

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as applicable, updates to the City of Norman's Language Assistance Plan.

Task 4. Providing Notice to LEP Persons

The City of Norman and our transit contractor do the following to inform LEP persons of the availability of language assistance services:

- Review outreach activities and the frequency of contact with LEP individuals to determine whether additional language assistance services are needed.
- Identify and reach out to bilingual speaking person(s) on staff to assist with the development of bilingual outreach materials and translation assistance.
- Look into the hiring of bilingual staff, as needed.
- Utilize Oklahoma Relay 7-1-1, the state of Oklahoma resource to assist with communication needs: www.oklahomarelay.com.

Task 5. Monitoring and Updating the LEP Plan

The City of Norman reviews its plan on an annual basis or more frequently as needed. The City of Norman will evaluate the information collected on encounters with LEP persons as well as public outreach efforts to determine if adjustments should be made to the delivering of programs and services to ensure meaningful access to minority and LEP persons.

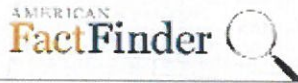
In addition, the City of Norman meets with our transit contractor on an annual basis to ensure that the Title VI requirements are met.

Appendix D

Attachment for Appendix D

Map of Spanish Spoken at Home by Ability to Speak English Less than Very Well
Population 5 Years and Over

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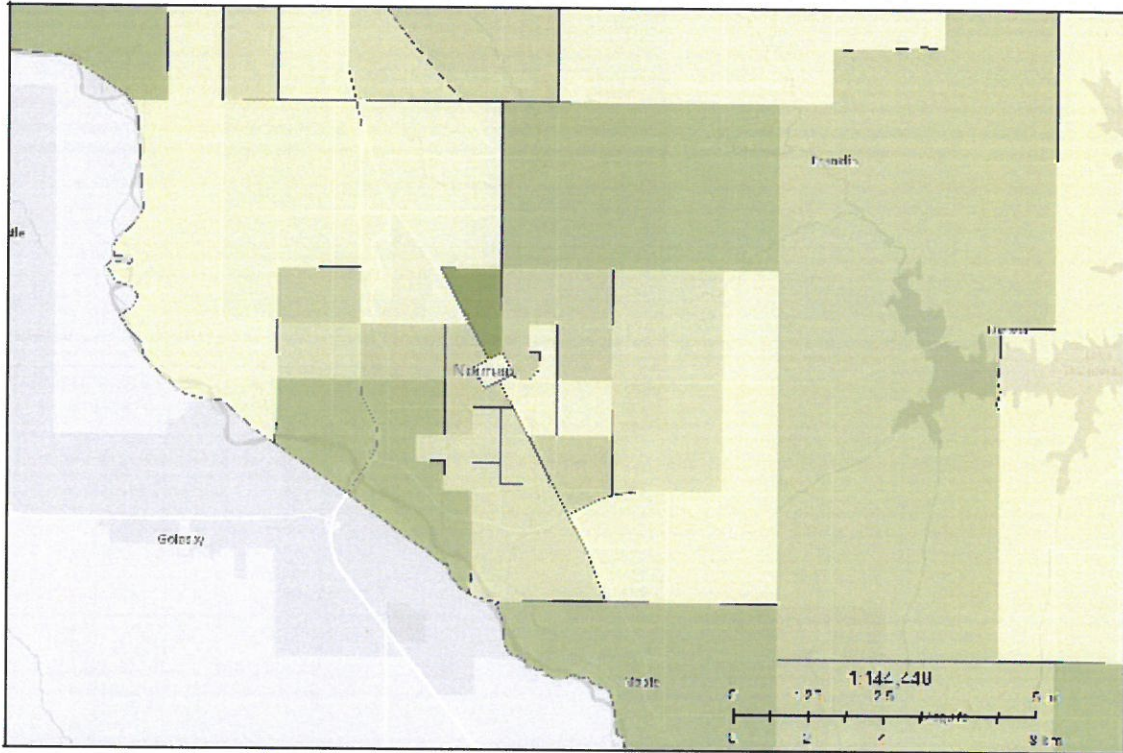


B16001

LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER

Universe: Population 5 years and over
2011-2015 American Community Survey 5-Year Estimates

Thematic Map of Estimate: Total: - Spanish or Spanish Creole: - Speak English less than "very well"
Geography by: Census Tract



Legend:

Data Classes

- 0 - 13
- 16 - 37
- 43 - 81
- 102 - 184
- 223 - 289

Boundaries

No Legend

Supporting documentation on code lists, subject definitions, data accuracy, and statistical testing can be found on the American Community Survey website in the Data and Documentation section.

Sample size and data quality measures (including coverage rates, allocation rates, and response rates) can be found on the American Community Survey website in the Methodology section.

Tell us what you think. Provide feedback to help make American Community Survey data more useful for you.

Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states,

APPENDIX E

R-1920-86

A RESOLUTION OF THE COUNCIL OF THE CITY OF NORMAN,
OKLAHOMA, ADOPTING A PUBLIC TRANSPORTATION TITLE
VI PROGRAM OF THE 1964 CIVIL RIGHTS ACT.

- § 1. WHEREAS, the City of Norman is an active grantee/direct recipient of Federal transit funds; and
- § 2. WHEREAS, 49 CFR § 21.9(b) requires the City of Norman to have a Title VI Program in compliance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d *et. seq.*; and
- § 3. WHEREAS, the City of Norman is required to submit its Title VI Program to the Federal Transit Administration (FTA) every three years; and
- § 4. WHEREAS, Title VI of the Civil Rights Act prohibits discrimination on the basis of race, color, or national origin in programs or activities receiving federal financial assistance; and
- § 5. WHEREAS, the City of Norman's Title VI Program includes public notice provisions, establishment of a complaint form and procedures, a public participation plan, a language assistance plan, and other general reporting requirements of the FTA as well as standards and policies for fixed route system-wide service.

NOW, THEREFORE, BE IT RESOLVED BY THE COUNCIL OF THE CITY OF NORMAN, OKLAHOMA:

- § 6. THAT the City of Norman hereby adopts Exhibit A, the City of Norman's Public Transportation Title VI Program, including Appendices A, B, C, D, and E, attached hereto as Exhibit A and made a part hereof.

PASSED AND ADOPTED this 28th day of January, 2020.

Mayor

ATTEST:

City Clerk