

## Seneca-Crawford Area Transportation

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**Subject:** Title VI – Civil Rights

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**Effective Date:** 8/16/2022

**Replaces:** All previous

**Approved By:** Seneca-Crawford Board of Directors

**Approval Date:** 8/16/2022

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**Purpose:**

To ensure that SCAT is in compliance with state and federal laws relating to Title VI of the Civil Rights Code.

**Responsibilities:**

The Transit Director will ensure that SCAT complies with law and completes all reporting requirements.

**Related Documents:**

Policy 1.8 Public Participation

Procedure 1.9a Title VI Complaint Procedure

Attachment 1-E Disadvantaged Business Enterprise Plan

Attachment 1-F Limited English Proficiency Plan

Attachment 1-G Title VI List of Investigations, Complaints and Lawsuits

Attachment 1-H Title VI Complaint Form

Attachment 1-I Notifying the Public of Rights Under Title VI

**Policy:**

SCAT adheres to Title VI of the Civil Rights Act of 1964 as amended, Section 601. This section states, “No person in the United States 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.” SCAT submitted the Title VI Assurances to the ODOT Office of Transit with the initial application for federal funding and will submit updates annually to the Office of Transit with an update to FTA every three years.

In accordance with Title VI regulations, SCAT will not:

- Deny any protected individual service, financial aid, or benefit under the program
- Provide any service, financial aid, or benefit that is different for protected individuals from that provided to others
- Subject a protected individual to segregation or separate treatment
- Restrict a protected individual in the employment of any advantage or privilege enjoyed by others
- Treat protected individuals differently in terms of whether they satisfy admission, eligibility, or membership requirements
- Deny a protected individual the opportunity to participate in the provision of services
- Deny a protected individual the opportunity to participate as a member of a planning or advisory body
- Use criteria or methods of administration that have the effect of subjecting individuals to discrimination

- Make decisions in regard to facility location with the purpose of subjecting persons to discrimination
- Discriminate with regard to the routing, scheduling, or quality of transit service
- Use race, color, or national origin as a basis for determining frequency of service, age and quality of vehicles assigned to routes, quality of stations serving different routes, and location of routes

In accordance with Title VI regulations, SCAT will take affirmative action to assure non-discrimination including the following eight required actions:

1. Develop Title VI Complaint Procedures. (See 1.9a Title VI Complaint Procedure)
2. Record Title VI investigations, complaints, and lawsuits (See Attachment 1-G Title VI List of Investigations, Complaints and Lawsuits)
  - a. Maintain a list of active investigations conducted by entities other than FTA, lawsuits or complaints alleging discrimination
    - i. Date filed
    - ii. Summary of allegation
    - iii. Current status
    - iv. Actions taken in response
  - b. Notify ODOT immediately in the case of a lawsuit or complaint alleging discrimination
3. Provide meaningful access to persons with Limited English Proficiency – benefits, services, information, and other important portions of their programs. (See Attachment 1-F: Limited English Proficiency Plan)
4. Notify beneficiaries of Title VI protections
  - i. Disseminate information to the public. SCAT will include a statement on all printed materials indicating that we will operate programs without regard to race, color, national origin, sex, age, income, or disability
  - b. Use a variety of dissemination methods
  - c. General notification
  - d. Document translation
5. Provide additional information upon request
6. Prepare and submit a Title VI program and report information as part of our ODOT grant
7. Analyze impact of construction projects in accordance with the National Environmental Policy Act (NEPA) and ODOT procedures.
8. Promote inclusive public participation by conducting public outreach and involvement activities with minority and low-income individuals.(See Policy 1.8 Public Participation)

SCAT will encourage public participation in advisory boards and councils to aid in public transportation decision-making without regard to race, color, or national origin. Below is a breakdown of SCAT's selected governing board categorized by race.

<b>Body</b>	<b>Caucasian</b>	<b>Latino</b>	<b>African American</b>	<b>Asian American</b>	<b>Native American</b>	<b>Other</b>
Population						
Seneca	88.4%	3.6%	4.8%	1.4%	0.2%	1.6%
Crawford	96.4%	1.0%	1.2%	0.6%	0.3%	0.5%
Governing Board	100%					0.0%