

Regional
Transportation
Authority of Central
Oklahoma

Title VI Program

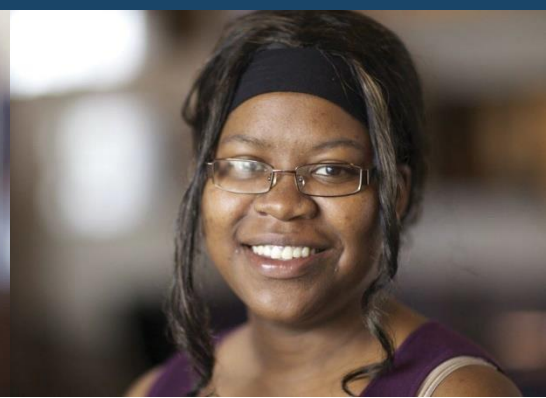
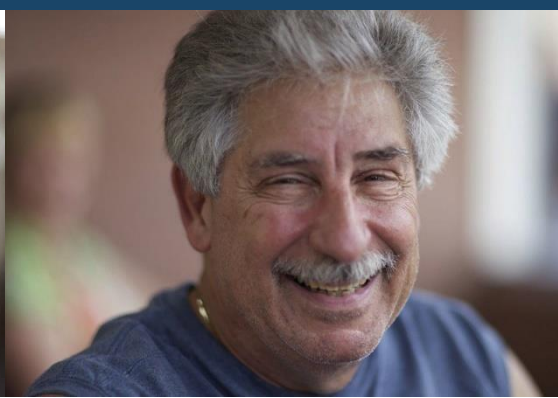


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Introduction

Purpose

This document contains information regarding the Title VI Program administered by the Regional Transportation Authority of Central Oklahoma (RTA). This program is intended to:

- Ensure that the level and quality of public transportation service is provided in a non-discriminatory manner;
- Promote full and fair participation in public transportation decision-making without regard to race, color, or national origin;
- Ensure meaningful access to transit-related programs and activities by persons with limited English proficiency; and
- Ensure compliance with Title VI of the 1964 Civil Rights Act.

Section 601 of the Title VI of the Civil Rights Act of 1964 states:

No person in the United States shall, on the ground 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.

Term

This RTA Title VI Program is effective for three years, starting _____, and terminating _____.

Agency Profile

The Regional Transportation Authority of Central Oklahoma (RTA) is a public trust created pursuant to Title 60 O.S. § 176 et seq., as authorized by Title 68 OS §1370.7, for the purpose of planning, financing, constructing, maintaining, and operating transportation projects located within the boundaries of the RTA. The RTA was established in 2019. The Cities of Oklahoma City, Edmond, and Norman (Member Cities) are the beneficiaries of the RTA.

The RTA is governed by a Board of Directors, a seven-member group that directs the activities and initiatives of the RTA. To assure regional representation, each Member City appoints two directors, except for Oklahoma City, which, based on population and taxation, appoints three. The Chairman of the RTA is elected from among the appointed members.

The RTA is currently supported by an Interim Executive Director who oversees administrative services, and an Owner's Representative who supervises and directs consultants providing services to the RTA. See Attachment A for the RTA organizational chart.

The RTA currently has multiple alignments under study and anticipates the RTA Board will adopt one or more locally preferred alternatives to provide commuter, light rail, and/or BRT services in the Central Oklahoma Region. The RTA anticipates receiving voter approval for a stable and reliable source of local funds in the next 2-3 years and is initiating the New Recipient Process at this time in anticipation of

advancing the eligibility of the RTA to become a direct recipient of FTA program funds. Significant planning and milestones must be achieved before the RTA begins providing transportation services.

Title VI Coordinator

The RTA has a Title VI Coordinator who is responsible for implementing, monitoring, and administering the RTAs Title VI Program and ensuring compliance with Title VI of the Civil Rights Act of 1964. The RTAs Title VI Coordinator may be contacted at:

RTA
Attn: Title VI Coordinator
2000 S. May Ave.
Oklahoma City, OK 73108
(405) 297-1331
info@rtaok.org

Submissions and Updates

The FTA requires that the RTA document its compliance with DOT's Title VI regulations by submitting a Title VI Program to its FTA regional civil rights officer once every three years or as otherwise directed by FTA. Updated programs must be submitted no fewer than sixty (60) calendar days prior to the date of expiration of the Title VI Program.

Title VI Notice to the Public

Title VI Notice

Notifying the Public of Rights Under Title VI Regional Transportation Authority of Central Oklahoma

The Regional Transportation Authority of Central Oklahoma (RTA) operates its programs and services without regard to race, color, and national origin in accordance with the and the Title VI of the Civil Rights Act. Any person who believes that he or she has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the RTA. Title VI complaints must be filed within 180 days of the alleged discriminatory event or practice. Complaints must be filed using the RTAs Title VI Complaint Form and submitted electronically to jason.ferbrache@okc.gov or mailed to:

RTA
Attn: Title VI Coordinator
2000 S. May Ave.
Oklahoma City, OK 73108

Title VI information and the RTAs Title VI Complaint Form can be located at www.RTAok.org or by contacting (405) 235-7433.

If information is needed in another language, contact (405) 235-7433.

Availability of Notice

The RTA displays its Title VI Notice on its website (www.RTAok.org) and in public areas of the RTAs facilities and offices, specifically the RTAs public meeting location at 431 W Main St, Suite B, Oklahoma City, OK 73108.

Title VI Complaint Procedures

Complaint Process

The RTA will process complaints from any person who believes that he or she has been aggrieved by any unlawful discriminatory practice under Title VI that are filed within 180 days of the alleged incident. For purposes of this Program, the day of the alleged incident is (i) the date of alleged discriminatory act, or (ii) where there has been a continuing course of discriminatory conduct, the date on which the discriminatory conduct was discovered.

Complaints will be filed using the RTAs Title VI Complaint Form. The form may be found on the RTAs website (www.RTAok.org) and in Attachment B herein. Complaints will set forth as fully as possible the facts and circumstances surrounding the claimed discrimination.

Complaints must be submitted electronically to the RTAs Title VI Coordinator at info@rtaok.org or mailed to:

RTA
Attn: Title VI Coordinator
2000 S. May Ave.
Oklahoma City, OK 73108

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

For more information on the RTAs complaint process and complaint form, see the RTAs website at www.RTAok.org or contact (405) 235-7433.

If information is needed in another language, contact (405) 235-7433.

Investigation Procedures

Upon receipt of Title VI complaints, the RTA Title VI Coordinator will review and determine the basis of the complaint, whether the RTA has proper jurisdiction, and who should conduct the investigation. Within ten (10) business days of receipt, the Title VI Coordinator will provide the complainant with a written acknowledgment that the RTA received the complaint and whether the RTA will investigate the complaint.

The RTA has ninety (90) days to investigate complaints. If more information is needed to resolve the case, the RTA may contact the complainant. The complainant has ten (10) business days from the date of the letter to send the requested information to the investigator. If the investigator is not contacted by

the complainant or does not receive the additional information within ten (10) business days, the RTA may administratively close the case. A case may also be administratively closed if the complainant no longer wishes to pursue their case.

After the RTA investigates the complaint, the Title VI Coordinator 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 the staff member, or other action will occur. A complainant may appeal a decision by the RTA within twenty (20) calendar days of receipt of the closure letter or LOF. Notice of appeal shall be requested in writing and submitted electronically to the RTAs Title VI Coordinator at info@rtaok.org or mailed to:

RTA
Attn: Title VI Coordinator
2000 S. May Ave.
Oklahoma City, OK 73108

Title VI Complaints, Lawsuits, and Investigations against RTA

The RTA maintains a log of all Title VI complaints, lawsuits, and investigations. The RTA has not had any complaints, lawsuits, or investigations since its formation in 2019.

	Date	Summary	Status	Action Taken
Investigations				
NA	NA	NA	NA	NA
Lawsuits				
NA	NA	NA	NA	NA
Complaints				
NA	NA	NA	NA	NA

Public Participation Plan

The RTA is committed to public involvement and public participation. The RTA has a Public Engagement Plan (PEP) to guide its efforts to proactively initiate public involvement processes. The PEP endeavors to offer meaningful opportunities for the public, including low-income, minority, and limited English proficient populations, to be involved in the identification of social, economic, and environmental impacts of proposed transportation decisions. The RTA takes pride in its work to maintain a collaborative relationship with the community and its stakeholders.

The RTAs PEP can be found in Attachment C herein, or on the RTAs website at www.RTAok.org.

Limited English Proficiency Plan

The RTA will ensure meaningful access to benefits, services, information, and other important portions of its programs and activities for individuals who are limited-English proficient (LEP).

The RTAs LEP Plan can be found in Attachment D herein, or on the RTAs website at www.RTAok.org.

Minority Representation on Planning and Advisory Bodies

The RTA shall not deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is integral part of the RTA on the basis of race, color, or national origin. § 49 CFR 21.5.

The RTA Directors are appointed by the governing bodies of the Member Cities. Minority representation in the RTA Board of Directors is as follows:

	RTA Board	Non-Minority	Minority
Directors	7	7	0
Percent	100%		

The RTA currently has __ committees which are selected by.... Minority representation in those committees is as follows:

[insert committee table]

The RTA encourages Member Cities to consider Board of Director candidates from diverse backgrounds that have an interest in transit and mobility issues.

Subrecipient Compliance

Providing Assistance to Subrecipients

The RTA will provide necessary and appropriate assistance to its subrecipients to ensure compliance with 49 CFR Part 21.

Obligations

The RTA is required to keep such records and submit to the DOT timely, complete, and accurate compliance reports at such times, and in such form and containing such information, as the DOT may determine to be necessary to be able to ascertain whether the recipient has complied or is complying with 49 CFR Part 21.

When the RTA extends federal financial assistance to any other recipient, such other recipient shall also submit such compliance reports to the RTA as may be necessary to enable the RTA to carry out its obligations under 49 CFR Part 21.

Monitoring Subrecipients

The RTA monitors its subrecipients for compliance with 49 CFR Part 21. In order to ensure compliance, the RTA will:

- Require subrecipients to complete certain forms and provide certain information as a condition of receiving federal funds;
- Review subrecipient records and information for compliance; and
- Collect Title VI Programs from subrecipients and review programs for compliance.

Facility Analysis

In determining the site or location of “facilities,” the RTA will not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which 49 CFR Part 21 applies, on the grounds of race, color, or national origin, or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Civil Rights Act of 1964.

For purposes of this requirement, “facilities” does not include bus shelters, nor does it include transit stations, power substations, etc., as those are evaluated during project development and the NEPA process. “Facilities” included in this provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc.

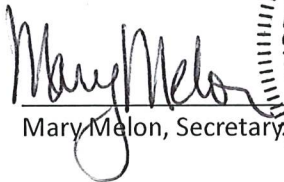
The RTA will complete a Title VI equity analysis during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. The RTA will engage in outreach to persons potentially impacted by the siting of facilities. The Title VI equity analysis will compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.

When evaluating locations of facilities, the RTA should give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the Census tract or block group where appropriate to ensure that proper perspective is given to localized impacts.

If the RTA determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, the recipient may only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin.

APPROVED by the Directors of the Regional Transportation Authority of Central Oklahoma and signed by the Chairperson on this 19th day of July, 2023.

ATTEST:


Mary Melon, Secretary



Regional Transportation Authority
of Central Oklahoma


Brad Henry, Chairperson

Reviewed for form and legality.

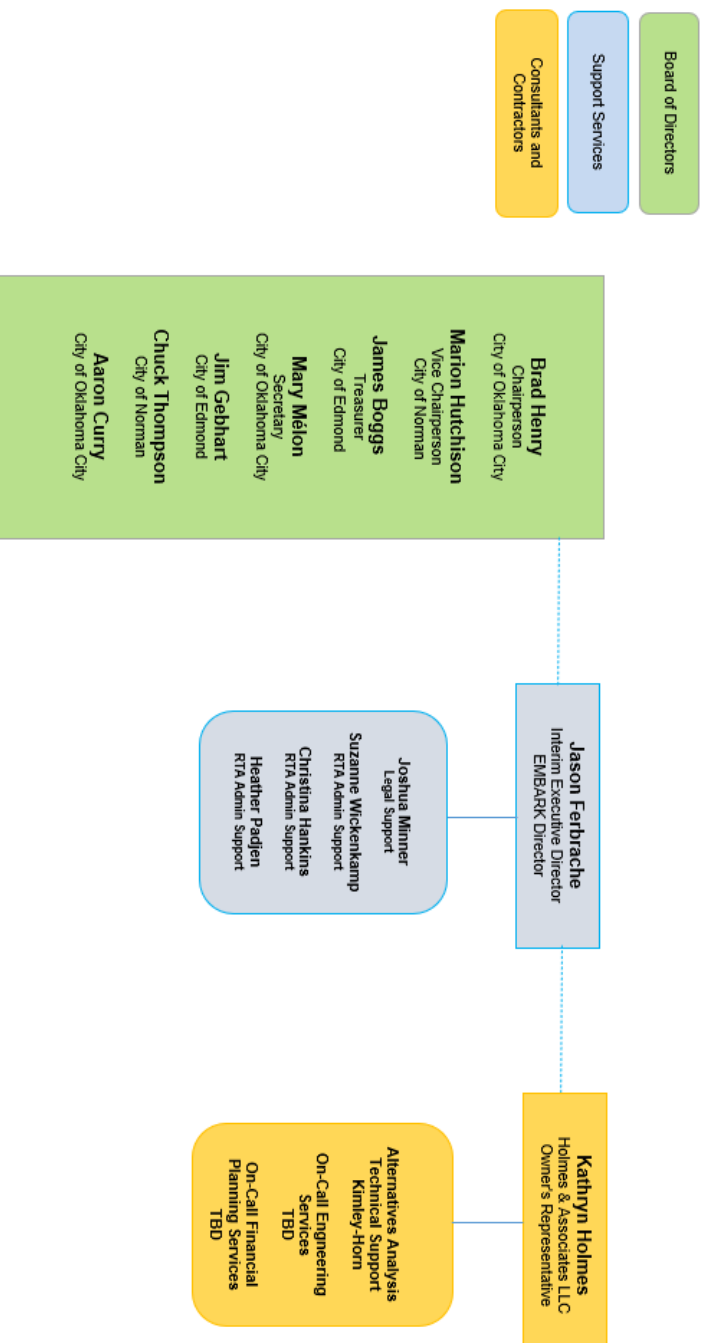

Josh Minner,
Assistant Municipal Counselor

Attachment A - RTA Organizational Chart



Organization Chart
Updated April 26, 2023

Updated April 26, 2023



Attachment B - Title VI Complaint Form

The Regional Transportation Authority of Central Oklahoma (RTA)

ADA / Title VI Complaint Form

Title VI of the Civil Rights Act of 1964 requires that "No person in the United States shall, on the ground 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."

The RTA operates its programs and services in compliance with the Americans with Disabilities Act and Federal Transit Administration guidelines for the provision of services to individuals with disabilities.

All complaints must be in writing and signed by the complainant or his/her representative before action can be taken. Complaints shall state, as fully as possible, the facts and circumstances surrounding the alleged discrimination. The RTA will provide a written acknowledgment of the complaint within ten (10) working days.

The completed form should be sent to: RTA: ADA / Title VI 2000 S. May Ave. Oklahoma City, OK 73108

Complainant Contact Information (Person discriminated against)

Name	AM Phone	PM Phone
Mailing Address		
City	State	Zip Code
		E-Mail

Person Discriminated Against (If other than complainant)

Name	AM Phone	PM Phone
Mailing Address		
City	State	Zip Code
		E-Mail

Incident Details

What was the discrimination based on? (Check all that apply)

☐ Race

☐ Color

☐ Low Income

☐ Disability

☐ National Origin

☐ Gender

☐ Limited English Proficiency

Date of incident resulting in discrimination

Time of Incident

Where did the incident take place? Please provide specific details (i.e. location, bus number, driver's name, etc.)

What RTA representative(s) are the person alleging were involved?

Describe how you were discriminated against. Who was responsible and what happened?

Witness 1 Please provide their contact information.

Name	AM Phone	PM Phone	
Mailing Address			
City	State	Zip Code	E-Mail

Witness 2 Please provide their contact information.

Name	AM Phone	PM Phone	
Mailing Address			
City	State	Zip Code	E-Mail

Did you file this complaint with another federal, state, or local agency or court?

☐ Yes ☐ No

If yes, check the agency the complaint was filed with and provide agency contact information:

☐ Federal Agency ☐ Federal Court ☐ State Agency ☐ State Court

☐ Other Date Filed:

Agency Contact Information

Agency Name	Contact Person	Phone	
Mailing Address			
City	State	Zip Code	E-Mail

Sign the complaint in the space below. Attach any documents you believe support your complaint.

Complainant's Signature: _____ Signature Date: _____

Attachment C - Public Engagement Plan

Regional Transportation Authority of Central Oklahoma

PUBLIC ENGAGEMENT PLAN

2023

PUBLIC ENGAGEMENT PLAN

Introduction

The Public Engagement Plan (PEP) is a guide for the Regional Transportation Authority of Central Oklahoma (RTA) to proactively initiate public involvement processes. The purpose of this PEP is to promote the use of effective methods to inform and provide meaningful opportunities for input by all members of the public on transportation decisions, as required by Title VI of the Civil Rights Act of 1964, and its implementing regulations.

This plan is a living document which will evolve to help the RTA deepen and sustain its work to engage all stakeholders in the regional transportation district. The plan allows the opportunity for the public to be involved in all phases of the public comment process by providing complete information, timely public notice, the opportunity for making a comment, and full access to crucial decisions. All comments are ultimately shared with the Board of Directors for consideration before decision making.

Definition of Public Engagement

Public engagement is the process through which stakeholders' concerns, desires, and values are incorporated into the decision-making process related to services provided by the RTA. Distinct from those processes carried out by staff or elected officials that result in administrative decisions, public engagement refers to methods that enable stakeholders to affect and/or influence a decision-making process directly.

Primarily consisting of the public, stakeholders can include a broad range of individuals and interests such as:

- Transit customers
- Individuals or groups affected by a transportation project or action
- Individuals or groups that believe they are affected by a transportation project or action
- Traditionally under-served and under-represented communities
- Residents of affected geographic areas
- Government agencies
- Community-based organizations (CBOs)
- Non-governmental organizations (NGOs)

Public engagement is often described as a continuum with many possible combinations of activities that include methods related to informing, listening to, and engaging stakeholders. These activities typically culminate in the development of agreements or expectations related to decision outcomes.

Regulations

The RTA functions under a wide variety of federal, state, and local requirements. The list below provides a non-exclusive overview of the basic laws, regulations, and regional policies the RTA operates within.

Federal Requirements:

- Americans with Disabilities Act of 1990
- Title VI of the Civil Rights Act of 1964
- Executive Order 13166 - Improving Access to Services for Persons with Limited English Proficiency
- Executive Order 12898 - Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations
- National Environmental Policy Act (NEPA)

State of Oklahoma Requirements:

- Open Meetings Act
- Open Records Act

Values and Objectives

The PEP endeavors to offer meaningful opportunities for the public, including low income, minority, and limited English proficient populations, to be involved in the identification of social, economic, and environmental impacts of proposed transportation decisions by the RTA.

Values

The RTA is guided by the following values while implementing the PEP:

- *Equity* - The RTA will provide broad access and the opportunity to collaborate and receive information while keeping potential barriers to participation incorporated in the process;
- *Diversity* - Participants represent a range of social, economic, ethnic, and cultural perspectives, with representative participants including residents from low- income neighborhoods, ethnic communities, and residents with limited English proficiency (LEP), and other traditionally underserved people;
- *Efficiency* - Recognizing limited resources, the RTA will engage in methods proven to reach a large number of people in a meaningful way;
- *Transparency* - The RTA will provide timely information and updates to the public and stakeholders;
- *Meaningful* - Engagement methods used to gather feedback will be helpful to informing plans, projects, programs, strategies, and decisions; and
- *Continuous Dialogue* - The RTA will provide information regularly to the public and stakeholders while continuously offering availability for collaboration and comment.

Objectives

While implementing the RTAs values, engagement methods will:

- Ensure continuous opportunity for regional buy-in and engagement;
- Generate and maintain excitement for regional transit;

- Ask meaningful questions of the public and stakeholders that result in realistic and achievable strategies and actions;
- Ensure opportunity for community and stakeholder buy-in at each key stage; and
- Provide timely notification of engagement and commenting opportunities.

Key Groups

RTA Board of Directors

The RTA is governed by a Board of Directors, a seven-member group that directs the activities and initiatives of the RTA. To assure regional representation, each member city appoints two directors, except for Oklahoma City, which, based on population and taxation, appoints three. The Chairman of the RTA is elected from among the appointed members.

The Board defines the organization's mission, establishes goals and expectations, and approves the budget to accomplish the goals. The Board of Directors meets on the third Wednesday of each month at 431 W Main Suite B, in Oklahoma City. Board meetings allow for communication among the directors, administrator, staff, and residents of the transportation district.

Member Cities

The RTA is an Oklahoma public trust. The beneficiaries of the RTA are the Cities of Oklahoma City, Edmond, and Norman. The RTA communicates with technical teams from each Member City to gain local context and to collaborate on components of technical analysis and work. Technical Working Groups serve not only for communication purposes, but also data gathering and check-in purposes to ensure continued Member City input and buy-in on progress within their jurisdiction.

Stakeholders

Stakeholders are individuals and groups who have specific and relevant perspectives essential to the success of the RTA. Stakeholders include individuals and groups such as major destinations or employers, students, landowners, developers, non-profits, related interest clubs (ex. biking, transportation, etc.), and partner agencies (ex. EMBARK, ODOT, ACOG, etc.).

General Public

The general public represents the majority of people who will be engaged by the RTA—the residents, employees, and stakeholders within each of the Member Cities, as well as those who may utilize the potential transit to travel to and through the Member Cities. Ensuring that everyone has access to participate in the RTAs projects, including those with Limited English Proficiency (LEP) and limited economic means, is important to the success of the RTA. End users of the potential transit system are included in this key group.

Public Engagement Methods

RTA Website

RTA maintains a comprehensive website at www.RTAok.org. This site is updated regularly and houses information pertinent to projects, plans, and outreach efforts. The site also includes a Title VI page aimed at educating the public about RTA's Title VI programs. Additionally, public notices of all RTA public meetings, public hearings, community meetings, open houses, workshops, and public comment periods are posted on this site. Some programs and projects may have dedicated landing pages (or micro-sites) that include information about upcoming meetings, fact sheets, and projects and plans.

Project Website

Information about projects under study by the RTA may be found at www.RTAMoves.com. Project information includes:

- Project description
- Current engagements for collaboration
- Upcoming and past events
- Project timeline
- Comment/question form
- Document library containing any engagement recaps or documents useful to a project
- Project contacts
- Social media links

Social Media

The RTA's Facebook and Twitter accounts will be used to guide Key Groups strategically to the engagements and information on www.RTAMoves.com during each Engagement Campaign. The RTA advertises engagement activities, upcoming events, and project milestones, as well as responds to any Facebook Messages. Social media has a broad reach and will contribute to RTA awareness and activities.

You Tube

The RTA's official YouTube channel houses all videos or recorded past events or meetings. The RTA utilizes this platform to provide transparency to the public with documentation of all past meetings and engagements. Videos posted can include monthly RTA Board Meetings, town halls (virtual or in person), meetings in Member Cities, and more. The YouTube video links are shared on project updates, meetings, and RTA's social media platforms.

Email Updates

The RTA has merged subscriber lists between www.RTAOK.org and www.RTAMoves.com so that anyone who subscribes for updates on either site can receive email updates. Email updates will be sent out to subscribers about current or scheduled engagement activities for collaboration or new information that is posted for review and comment.

Proactive Press and Notifications

Press releases are prepared at the beginning of new engagement campaigns that will detail current engagements available on www.RTAMoves.com for collaboration or new information that is posted for review and comment. The RTA distributes press releases to Member City media outlets and posts them on the RTA's Facebook and Twitter, as well as on its website.

Public Comments

There are multiple ways that individuals can provide verbal or written comments about any subject to the RTA. Comment cards are supplied at all community meetings, open houses, workshops, public hearings, and public meetings. The RTA website has multiple mechanisms to receive comments including a comment form, an email button that automatically begins an email to the RTA, comment forms on project pages, mailing address, and a customer service phone number where staff can take comments over the phone.

Surveys

The RTA may conduct surveys in print, by phone, in-person, and or online to collect public opinion on specific topics or issues. Depending on the data being collected, the RTA considers the methodologies that provide statistically valid data when possible. Surveys are available in English and Spanish, to increase the response rate from low income, minority, and LEP populations.

Conclusion

The RTA understands the importance of reaching under-represented populations, both as part of its commitment to being a valued community partner and in recognition of the significant proportion of its customer base which is included in these populations.

It is necessary to establish procedures that allow for, encourage, solicit, and monitor participation of all stakeholders in the RTA transportation district area to ensure proactive public involvement in the planning process. The goal of this PEP is to have significant and ongoing public involvement, by all identified audiences, in the public participation process for RTA outreach efforts.

Attachment D – Limited English Proficiency Plan

Regional Transportation Authority of Central Oklahoma

LIMITED ENGLISH PROFICIENCY PLAN

2023

Limited English Proficiency Plan

Introduction

The Need for an LEP Plan

Individuals with a limited ability to read, write, speak, or understand English are considered Limited English Proficient or “LEP.” This language barrier may prevent individuals from accessing public services and benefits, including public transit services.

The RTA’s LEP Plan is a critical component in meeting the transit needs of the diverse communities comprising its regional transportation district. Providing language assistance in a competent and effective manner will help ensure that the RTA’s services and communications are safe, reliable, convenient, and accessible to LEP persons in the community.

Federal Requirements

Title VI of the Civil Rights Act of 1964 and Executive Order 13166, signed on August 11, 2000, are the federal legislation necessitating LEP plans from public agencies receiving federal funds.

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., and its implementing regulations provide that 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 otherwise subjected to discrimination under any program or activity that receives federal financial assistance. The U.S. Supreme Court has ruled that LEP is a component of the protected class of national origin.

Executive Order 13166, “Improving Access to Services with Limited English Proficiency,” requires Federal agencies to examine the services they provide, identify any need for services to those with LEP, and develop and implement a system to provide those services so LEP persons can have meaningful access to them. Executive Order 13166 also requires that the federal agencies work to ensure that recipients of federal financial assistance provide meaningful access to their LEP applicants and beneficiaries. The Executive Order applies to all federal agencies and all programs and operations of entities that receive funding from the federal government—including state agencies, local agencies and governments, private and non-profit entities, and sub-recipients, such as public transit agencies.

The U.S. Department of Transportation (DOT) published revised LEP guidance for its recipients on December 14, 2005. The Federal Transit Authority (FTA) references the DOT LEP guidance in its Circular 4702.1A, “Title VI and Title VI-Dependent Guidelines for FTA Recipients,” which was published on April 13, 2007. This Circular reiterates the requirement to take responsible steps to ensure meaningful access to benefits, services, and information for LEP persons and suggests that FTA recipients and sub-recipients develop a language implementation plan consistent with the provisions of Section VII of the DOT LEP guidance.

RTA LEP Plan

The Regional Transportation Authority of Central Oklahoma (RTA) has developed this Limited English Proficiency Plan to assist in identifying reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access RTA services. 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 to provide this assistance; and
- How to notify LEP persons that assistance is available.

The “Four Factor Analysis”

Recipients of federal funds are required to take reasonable steps to ensure meaningful access to LEP persons to the programs and activities initiated by the recipient. According to Executive Order 13166, LEP Persons are defined as those who have limited ability to read, speak, write, or understand English. The RTA used the DOT guidance related to the “four factors” that recipients are to consider when assessing language needs and determining appropriate steps to ensure meaningful access for the LEP community. By conducting the “Four Factor Analysis,” the RTA is better positioned to implement a cost-effective and appropriate mix of proactive language assistance measures and to respond to requests for LEP assistance from constituents.

The four (4) factors are:

- The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee;
- The frequency with which LEP individuals come in contact with the program;
- The nature and importance of the program, activity, or service provided by the recipient to the LEP Community; and
- The resources available to the recipient and the overall cost.

Size of Language Group	Recommended Provision of Written Language Assistance
1,000 or more in the eligible population in the market area or among current beneficiaries	Translated vital documents
More than 5% of the eligible population or beneficiaries and more than 50 in number	Translated vital documents
More than 5% of the eligible population or beneficiaries and 50 or less in number	Translated written notice of right to receive free oral interpretation of documents
5% or less of the eligible population or beneficiaries and less than 1,000 in number	No written translation is required

Table 1: LEP Provision of Written Language Assistance Requirements

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee

To identify the number of LEP persons in the RTA service area, the RTA utilized the US Census Bureau American Community Survey 2017-2021 5-year estimates of language spoken at home. The LEP population was determined by the RTA Service Area which is currently defined by the member cities of the RTA, including Oklahoma City, Edmond, and Norman (see Figure 1). Table 2, shown below, highlights the number and percentage of LEP people based off their language spoken at home based on the Census results.

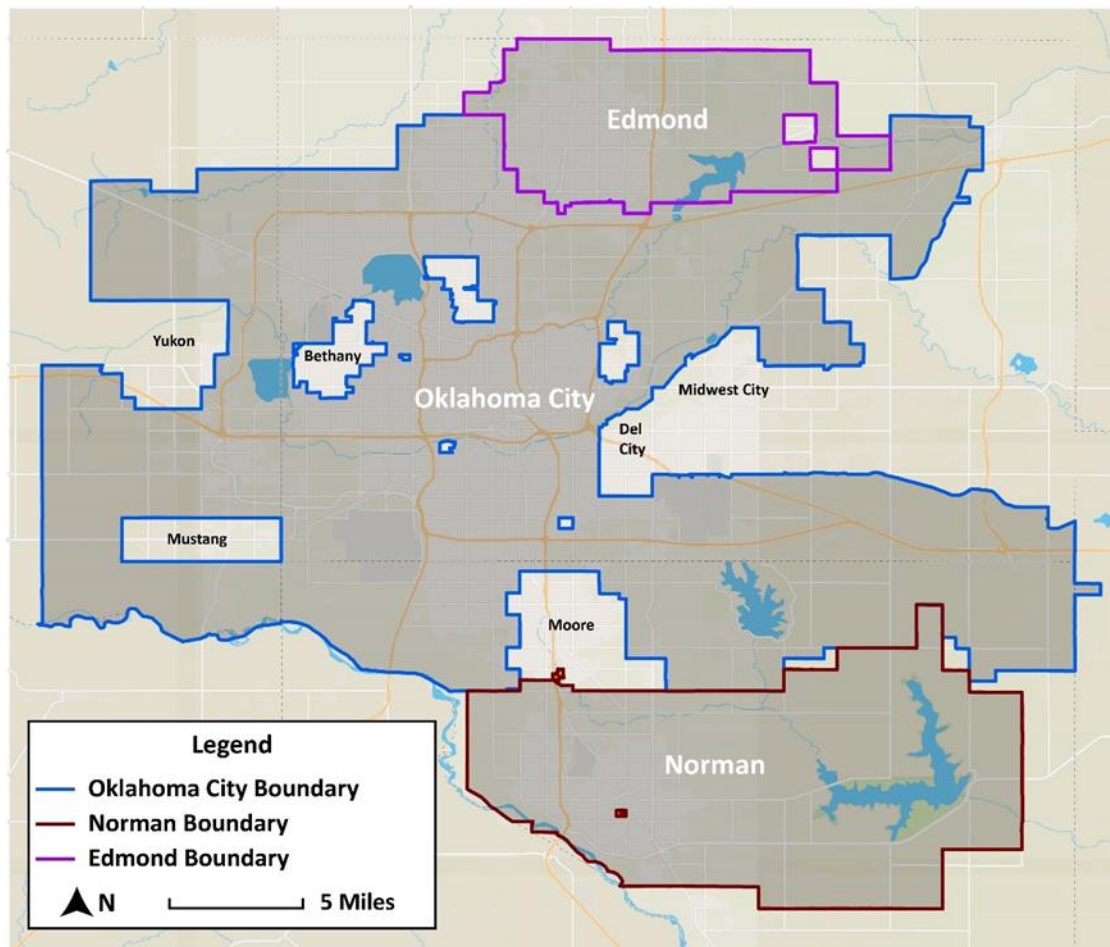


Figure 1: RTA Service Area

The LEP population makes up 6.7% of the RTA Service Area population. Results from this analysis shows that Spanish encompasses the largest group of LEP Persons (5% of LEP Persons), Vietnamese is the second largest group (0.6% of LEP Persons), and Other Asian and Pacific Island Languages is the third largest (0.3% of LEP Persons). These languages, along with Chinese (including Mandarin, Cantonese) and Other and unspecified languages, meet the thresholds found in Table 1 for the translation of vital documents. Table 2 highlights the total population of the service area, the number of people who speak English less than “very well”, and the percent LEP persons in the population. The populations that meet the thresholds for the translation of vital documents are highlighted in Table 2.

LEP Assessment, Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over, Oklahoma City, Edmond, and Moore, Oklahoma, ACS 2017-2021				
Language Spoken at Home	Total Population	Percent of Population	Total Speak English less than "very well"	Percent LEP Persons
Total	773,392			
Speak only English	636,924	82.4%		
Spanish	98,466	12.7%	38,433	5.0%
Vietnamese	8,436	1.1%	4,875	0.6%
Other Asian and Pacific Island languages	5,850	0.8%	2,208	0.3%
Chinese (incl. Mandarin, Cantonese)	4,402	0.6%	1,995	0.3%
Other and unspecified languages	4,721	0.6%	1,123	0.1%
Other Indo-European languages	5,907	0.8%	929	0.1%
Korean	1,450	0.2%	624	0.1%
French, Haitian, or Cajun	1,915	0.2%	410	0.1%
Arabic	1,323	0.2%	345	<0.1%
German or other West Germanic languages	1,664	0.2%	342	<0.1%
Russian, Polish, or other Slavic languages	1,685	0.2%	321	<0.1%
Tagalog (incl. Filipino)	649	0.1%	226	<0.1%

Table 2: LEP Assessment

Factor 2: The frequency with which LEP individuals come in contact with the program

To conduct Factor 2, the RTA relied on an audit of the engagement events completed since January 2021. Since the RTA is still new as an agency and not actively providing any transit services, contact with LEP Persons are taking place at engagement events virtually and in-person. RTA has provided Spanish translation at in-person and virtual events and provides translation of printed materials upon request. Due to a lack of data regarding contact with LEP persons, the RTA will develop a methodology to collect and report this data on a regular basis.

Factor 3: The nature and importance of the program, activity, or service provided by the recipient to the LEP Community

The RTA is currently evaluating the translation services that will be provided to the public. Based upon the LEP populations identified within the RTA service area, there will be additional training for RTA staff

to understand how to best engage and assist LEP persons. Currently, the RTA has engaged with LEP persons at engagement events, provided translation services for Spanish speakers, and provided the translation of documents.

Factor 4: The resources available to the recipient and the overall cost

The RTA's annual budget has provided funding for translation services during each public engagement campaign. As the RTA continues to plan and design future transit services, engaging the public and providing translation services will remain a high priority. In the past fiscal year (July 2022-June 2023), the RTA has allocated approximately \$4,000 to written and spoken translation services. The RTA remains committed to implementing the staff training, outlined below, to work with LEP populations, be inclusive of all cultures, and work with non-English speaking customers.

Language Assistance

A person who does not speak English as their primary language and who has a limited ability to read, write, speak, or understand English may be a limited English proficient person and may be entitled to language assistance with respect to RTA programs and activities. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language or translation, which means the written transfer of a message from one language into another language.

The RTA will determine when interpretation or translation are needed and are reasonable. RTA staff may identify an LEP person who needs language assistance by:

- Examining records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed in the future;
- Having Language Identification ("I Speak") Flashcards available at the customer service desk and easily accessible to operators, supervisors, dispatchers, and schedulers as needed; and/or
- Periodically interviewing operators, dispatchers, schedulers and other front-line staff on their experience concerning any contacts with LEP persons during the previous year.

Language Assistance Measures

There are several language assistance measures available to LEP persons, including both oral and written language services. There are also various ways in which RTA staff may respond to LEP persons, whether in person, by telephone, or in writing, to include, but not limited to, the following:

- The RTA will provide an interpreter to an LEP person if they request language assistance or it is evident that such assistance is needed.
- If an LEP person asks for language assistance and the RTA determines that language assistance is necessary to provide meaningful access, reasonable efforts will be made to provide free language assistance.
- When an interpreter is needed, in person or on the telephone, staff will attempt to determine what language is required and then make available interpretation services for the LEP person.
- Bilingual RTA staff will provide language services to LEP persons upon request and if available. RTA will take reasonable steps to ensure that staff provides interpretative services at a level of

fluency, comprehension, and confidentiality appropriate to the specific nature, type, and purpose of information at issue.

- An LEP person may use an informal interpreter of their choosing and at their own expense, either in place of or as a supplement to the language assistance offered by RTA. Informal interpreters may include family members, friends, legal guardians, service representatives, or advocates of the LEP person.
- The RTA will periodically assess customer needs for language assistance based on requests for interpreters and/or translation, as well as the literacy skills of the clients.

LEP Assessment

Staff Training

The following training will be provided to RTA staff:

- Information on the Title VI Policy and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of the Language Identification (“I Speak”) Flashcards.
- Documentation of language assistance requests.
- How to handle a potential Title VI / LEP complaint.

All contractors or subcontractors performing work for RTA will be required to follow the Title VI/LEP guidelines.

Translation of Documents

The RTA currently offers the following translation services:

- When the RTA prepares a document or schedules a meeting for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in alternative language based on the known LEP population.
- Schedules, maps, and other transit publications will be made available in an alternative language when a specific and concentrated LEP population is identified, and requests are made.
- RTA website translation: Google Translate is available for use on the RTA website (www.RTAMoves.com) for Spanish, Vietnamese, and Chinese. Analytics during the previous submission period indicate 96.8% of website traffic was viewed in English. About 0.54% of website traffic was translated to Spanish and 0.39% to Chinese.
- Vital documents and content such as the Title VI Notice to the Public and translation information for all public notices are provided in Spanish, Vietnamese, and Chinese. The RTA will translate vital documents in any of these languages upon request.

Providing Notice to LEP Persons of the Availability of Language Assistance

The RTAs current and planned measures to inform LEP persons of the availability of language assistance includes, but is not limited, to the following:

- Public Notices: The RTA includes a statement on important notices that informs LEP persons of the availability of the information in a language accessible to them. This statement currently includes Spanish, Vietnamese, and Chinese.
- Local non-English newspapers: The RTA will issue media press releases in Spanish and purchase advertisements in local non-English newspapers publicizing language assistance measures offered by the RTA.
- Direct engagement with LEP populations and community organizations: Through working with various community organizations, the RTA will seek to identify and engage RTA populations in the community and inform them of available public transportation services and related language assistance mediums. Conducting “How to Ride” clinics in partnership with community organizations is a great tool in educating LEP persons on how to use RTA services. Direct engagement with LEP persons will also help the RTA learn what additional agency information may need translation.

Monitoring and Updating the LEP Plan

The RTA will update the LEP as needed. At a minimum, the plan will be reviewed and updated on a five-year cycle, or when higher concentrations of LEP individuals are present in the RTA service area.

Updates will include the following:

- The number of documented LEP person contacts encountered annually;
- How the needs of LEP persons have been addressed;
- Determination of the current LEP population in the service area;
- Determine whether local language assistance programs have been effective and sufficient to meet the need;
- Determine whether RTA’s financial resources are sufficient to fund language assistance resources needed;
- Determine whether RTA fully complies with the goals of this LEP plan;
- Determine whether complaints have been received concerning the RTAs failure to meet the needs of LEP individuals; and
- Maintain a Title VI complaint log, including LEP, to determine issues and basis of complaints.

Dissemination of Plan

The RTAs LEP Plan is available for viewing and downloading on its website at www.RTAok.org. The plan is also available upon request to the RTAs Title VI Coordinator by phone at (405) 297-1331, email at info@rtaok.org, or mail to:

RTA
Attn: Title VI Coordinator
2000 S. May Ave.
Oklahoma City, OK 73108

Questions about language assistance and the RTAs LEP Plan may also be directed to the RTAs Title VI Coordinator.