



## **CITY OF MADRAS**

### **Title VI Program**

*Adopted September 24, 2019*

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## **INTRODUCTION**

The City of Madras assures that no person shall on the grounds of race, color and national origin, sex or creed as protected by Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987 (PL 100.259), Section 520 of the Airport and Taxiway Improvement Act of 1982 and the Federal Transit Administration (FTA) Circular 4702.1.B, be excluded from participated in, be denied the benefit of, or be otherwise subjected to discrimination under any program or activity receiving Federal financial assistance.

The City of Madras further assures every effort will be made to ensure nondiscrimination in all its programs and activities, whether those programs are federally funded or not. Anytime communities may be impacted by programs or activities every effort will be made to involve their leaders and the general public in the decision-making process. Awards of contracting, concessionaires, and leases are made without regard for race, color, national original, sex or creed.

The City of Madras requires Title VI assurances from each tenant, contractor, and concessionaire providing an activity, service or facility at the airport under lease, contract or franchise from the airport. The City also requires that such tenants, contractors, and concessionaires require Title VI assurances of their subcontractors.

The City Administrator's Office is responsible for initiative and monitoring Title VI activities, preparing required reports and other responsibilities as required by 49 CFR 21.

<b>TITLE VI ADMINISTRATION</b>
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The City Administrator's Office is responsible for initiating and monitoring Title VI activities, preparing required reports and other responsibilities.

In addition, the following programs maintain a Title VI liaison responsible for coordinating Title VI information, data, and notices related to the program:

- Community Development Department
- Public Works Department
- Airport
- City Manager's Office

## TITLE VI ADMINISTRATIVE RESPONSIBILITIES

### Airport Complaints:

The Title VI Coordinator (in this case, someone within the City Administrator's Office) receives, records and forwards a copy of Title VI complaints to the Federal Aviation Administration (FAA) within 15 days of receipt when they are specific to the Airport. The Coordinator provides the FAA with an explanation of resolution attempts regarding the complaint. 49 CFR Part 21 Appendix C(b)(3).

Annually reviews the airport's Title VI plan and disseminates Title VI information, education, etc. to program liaisons.

Responds to requests by FAA for data and records to determine Title VI compliance. Coordinates with program liaisons to ensure that racial and ethnic data showing the extent to which minority groups are beneficiaries of or impacted by airport programs is available. 49 CFR § 21.9(b) & (c).

Maintains a list of the race, color, and national origin representation on non-elected planning and advisory bodies for the airport. Identifies any disparity between representation on these entities and the airport beneficiaries to the selecting official/committee when vacancies occur. DOT Order 1000.12(4)(b)(2)(a).

Maintains a copy of 49 CFR Part 21 for inspection by any person asking for it during normal working hours. This regulation is available at <http://www.usdoj.gov/crt/cor/byagency/dotvi.htm> or <http://www.usdoj.gov/crt/cor/byagency/dotvi.pdf>.

### ODOT Transportation Complaints:

## GRANT ASSURANCES

### 49 CFR § 21.7 (a)(1); 49 CFR Part 21:

The City of Madras, upon application for its first grant to purchase land or an airport or noise implementation project involving construction, executed the complete standard DOT Title VI assurances.

In subsequent grants the City includes the Civil Rights Grant Assurance as provided in the grant application package for all FAA-assisted contracts. These assurances can also be found on the Internet at <http://www.nw.faa.gov/airports/inetform.htm#APPS>.

Clauses/Covenants:

a. All contracts, leases, deeds, licenses, permits or other similar instruments, not only those resulting from the first grant, but in all instruments from that point on, contain the contractual requirements and clauses outlined in attachments one and two of the standard DOT Title VI Assurance.

b. The general Civil Rights Provision is inserted into all contractor, tenant, concessionaire, and lessee agreements. Further the City requires this provision to be included in all subcontracts, subleases and other agreements at any tier.

**TRANSPORTATION - AIRPORT**

49 Part CFR 21:

In the community statistics section of this plan, we identified the Latino and American Indian populations as disadvantaged communities. We have coordinated with East Cascade Transit to provide access to the airport from these locations.

**MINORITY BUSINESS NOTIFICATION - AIRPORT**

49 CFR 21:

Bids for airport concessions are solicited from area minority businesses through the following avenues: Local minority and general newspapers, trade journals, and a professional services directory, etc. Some of the bid notification sources include: The Madras Pioneer Newspaper, KWSO Radio Station, Central Oregon Builders Association (COBA), and the Latino Community Association. The concession award process is not based on race, color, national origin, sex or creed. Information on the award process and documentation for specific bid decisions is kept with the City of Madras Public Works Department.

## TITLE VI COMPLAINT PROCEDURES

In order to comply with 49 CFR Section 21.9(b), the City of Madras has developed procedures for investigating and tracking Title VI complaints filed against them. These procedures are available to members of the public upon request. Complainants, or their representative, may file a written complaint with the City Administrator.

For airport-related complaints, written Title VI complaints received by airport personnel are forwarded to the Title VI coordinator. The coordinator maintains a record of the complaint, conducts a preliminary review and attempt at resolution, and forwards a copy of the complaint and a description of the resolution efforts to the FAA within 15 days of receipt.

The following are our complaint procedures.

### **How to file a Title VI Complaint**

These procedures are for complaints of discrimination, other than employment discrimination by the City.

Any person that believes she or he has been discriminated against on the basis of race, color, or national origin by the City may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. The City will process complaints that are complete.

Once the complaint is received, the City will review it to determine which office has jurisdiction (FAA or FTA). The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by the FAA or FTA.

### Federal Aviation Administration Complaints:

They apply to discrimination by airport employees, contractors, concessionaires, lessees, or tenants of the Airport, or at Airport facilities based upon race, creed, color, national origin, or gender, including but not necessarily limited to complaints under Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987. They cover any program or activity administered by the City. Any person who feels that he or she has been subjected to discrimination based on race, creed, color, national origin, or gender has the right to file a complaint with the Airport. These procedures do not deny or limit the right of a complainant to file a formal complaint with an outside agency, such as the U.S. Department of Transportation or Federal Aviation Administration (FAA), or to seek private legal counsel regarding discrimination.

Complaints must be filed within ninety days (90) days after the discriminatory event, must be in writing, and must be delivered to:

City of Madras (attn.: City Recorder)  
125 SW E Street  
Madras, OR 97741  
By phone: 541-475-2344  
By email: [madrasinfo@ci.madras.or.us](mailto:madrasinfo@ci.madras.or.us)

If a complaint is initially made by phone, it must be supplemented with a written complaint within 90 days after the discriminatory event. Accommodation will be provided upon request to individuals unable to file a written complaint due to a disability.

A copy of complaints alleging what amounts to a Title VI violation by airport employees, contractors, concessionaires, lessees, or tenants, relative to the airports aviation activities, will be forwarded to the FAA. For information on filing a complaint with DOT/FAA contact the individual named above.

The Title VI Coordinator may meet with the complainant to clarify the issues, obtain additional information, and determine if informal resolution might be possible. The Title VI Coordinator will issue a written decision.

ODOT Transportation Complaints:

You may file a signed, written complaint up to one hundred eighty days (180) from the date of alleged discrimination. The complaint should include the following information:

- Your name, mailing address, and how to contact you (i.e., telephone number, email address, etc.)
- Name, address, phone number and relationship of Representative to Complainant, if applicable
- How, when, where and why you believe you were discriminated against. Include the location, names and contact information of any witnesses.
- Other information that you deem significant

A form is available at <http://www.ci.madras.or.us>, which may be completed for this purpose. (Attachment A)

**The complaint may also be filed in writing with the City of Madras at the following address:**

City of Madras (attn.: City Recorder)  
125 SW E Street  
Madras, OR 97741  
By phone: 541-475-2344  
By email: [madrasinfo@ci.madras.or.us](mailto:madrasinfo@ci.madras.or.us)

*NOTE: The City of Madras encourages all complainants to certify all mail that is sent through the U.S. Postal Service and/or ensure that all written correspondence can be tracked easily. For complaints originally submitted by an original, signed copy of the complaint must be mailed to the City Recorder as soon as possible, but no later than 180 days from the alleged date of discrimination.*

What happens to your complaint after it is submitted to the City of Madras?

These procedures are for complaints of discrimination, other than employment discrimination by the City. They apply to employees, contractors, concessionaires, lessees, or tenants based on race, color, national origin, or gender, including but not necessarily limited to complaints under Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987. They additionally cover any program or activity administered by the airport.

All complaints alleging discrimination based on race, color or national origin in a service or benefit provided by the City will be directly addressed. The City Administrator, or designee, will investigate the complaint and make a determination. The investigator will endeavor to avoid interfering with the investigation, will cooperate with the agency holding jurisdiction when possible, and will share factual information with the FAA or FTA.

Formal investigation of the complaint will be confidential and will include, but is not limited to, details of the specific incident, frequency and dates of occurrences and names of any witnesses.

The City of Madras shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. Additionally, the City shall make every effort to address all complaints in an expeditious and thorough manner.

In instances where additional information is needed for investigation of the complaint, the City Administrator, or designee, will contact the complainant in writing. Please note that in responding to any requests for additional information, a complainant's failure to provide the requested information within seven (7) calendar days may result in the administrative closure of the complaint.

Every attempt will be made to complete discrimination complaint investigations within sixty (60) calendar days after the complaint is received but recognizes that some investigations will take longer.

The Title VI Coordinator will quickly and fairly resolve disputes with complainants, or with contractors, tenants, or other persons, through negotiation, mediation, or some other form of conflict resolution (whichever is deemed most appropriate).



In addition to acting with respect to any specific instances of discrimination, the City will identify and implement measures to reduce the chances of similar discrimination in the future.

City employees will not intimidate or retaliate against a person who has filed a complaint alleging discrimination.

If a verbal complaint is received, the complainant should be given a copy of the Discrimination Complaint Procedures and instructed to submit a written complaint. Accommodation will be provided upon request to individuals unable to file a written complaint due to a disability.

The Title VI Coordinator will log in the complaint and promptly send copies of the complaint to the City Administrator, HR Director, Public Works Director, and Airport Manager (if appropriate).

If the discrimination complaint deals with the airport, then within 15 days of receipt, the Title VI Coordinator will forward a copy of the complaint and a statement describing all actions taken to resolve the matter and the results thereof to the FAA, Regional Civil Rights Staff.

After completing the investigation, the Title VI Coordinator will prepare a written report and consult the City's Legal Counsel regarding the investigation and the report.

How will you be notified of the outcome of your complaint?

The City will send a final written response to the complainant which will be either a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states there was not a Title VI violation and the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident and explains whether any disciplinary action, additional training of staff, or other action will occur. An appeal of the closure letter or IOF must be made within seven (7) calendar days of the notification. The written appeal must contain all arguments, evidence, and documents supporting the basis for the appeal. The City Administrator will issue a final written decision in response to the appeal.

Federal Aviation Administration Complaints:

Copies of each Title VI complaint, a summary of the investigation report, any response, and the Airport's transmittal letter to the complainant will be sent to the FAA.

ODOT Transportation Complaints:

A complaint may also be filed directly with the Federal Transit Administration at:

Federal Transit Administration Office of Civil Rights  
1200 New Jersey Ave., SE  
Washington, DC 20590  
[www.fta.dot.gov/contract\\_us.html](http://www.fta.dot.gov/contract_us.html)  
TTY: 1-800-877-8339  
Voice: 1-866-377-8642  
VCO: 1-877-877-6280

Recording Title VI Investigations, Complaints and Lawsuits

In order to comply with 49 CFR Section 21.9(b), the City of Madras prepares and maintains a list of any active investigations conducted by entities other than the FAA or FTA, lawsuits, or complaints naming the City of Madras that allege discrimination on the basis of race, color, or national origin. This list includes the date of the investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response to the investigation, lawsuit, or complaint. The City Recorder maintains these files until closed. The City Recorder will also maintain a log of all complaints received. Records will be stored according to state and federal record retention requirements. Tracked information will be reported to the Oregon Department of Transportation as the grantor of the funds.

Additional Information Upon Request

At the discretion of FTA and FAA, additional information may be requested, in writing, from the City in order to investigate complaints of discrimination or to resolve concerns about possible noncompliance with Title VI requirements.

**TITLE VI REPORTS AND FORMS**

The Public Works Department completes the “Title VI Pre-Award Sponsor Checklist” as part of the grant application package for projects that meet one or more of the following criteria: 1) Environmental assessment or impact statement; 2) Major runway extension; 3) Relocation of airport, runway, person or structure; or 4) Impact access or preservation of burial, ceremonial or other sacred or historic structure or lands of any indigenous or ethnic population.

The checklist is available on the City’s website at <http://ci.madras.or.us> or by calling your FAA Regional Civil Rights Staff.

The Title VI Coordinator will provide oversight of the entire Title VI Program. This includes ensuring training is conducted, language translation services are available, and

appropriate Title VI signage is posted. This also includes updating community statistics and corresponding with the FTA and FAA as necessary.

### **TITLE VI NOTICE REQUIREMENT**

We conspicuously display the Title VI Notification of Compliance. The Title VI coordinator ensures these notices are visible and maintained. Our City Administrator's Office ensures that required notices of public hearings and opportunities to comment on proposed airport actions reach all segments of the impacted community. Such notices are announced over general and minority newspapers and broadcast media, where available and as appropriate. Our City Administrator's Office contacts leaders in affected communities directly and solicits their participation. The office maintains records of all such notices and the efforts made to reach the affected community.

To ensure that the community is effectively informed of and able to participate in public hearings, our City Recorder advertises public notices in appropriate languages when a significant number or proportion of the affected community has limited English proficiency. Such notices will include direction for obtaining an interpreter free of charge for the public hearing. 28 CFR § 42.405(d)

## NOTIFICATION OF COMPLIANCE WITH TITLE VI

In order to comply with 49 CFR Section 21.9 (d) the City of Madras has posted information for the public regarding the Title VI obligations and protections against discrimination afforded to the public by Title VI on the City of Madras website. The City of Madras has also posted the following notice of compliance with Title VI, which is visible to the public at City Hall and directs the public to the City website and to the appropriate phone number to inquire for more information. This information is also available upon request.



### Notification of Compliance with Title VI

The City of Madras operates its programs and services without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act. Any person who believes they have been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the City of Madras, FTA and ODOT Office of Civil Rights.

Information on the City of Madras' civil rights program, and the obligations and procedures to file a complaint, can be found on the City of Madras website at <http://www.ci.madras.or.us>. This information is also available upon request, please inquire at City Hall or contact the City Recorder at (541) 475-2344.

Our City Administrator's Office ensures that required notices of public hearings and opportunities to comment on proposed airport actions and transportation actions reach all segments of the impacted community. Such notices are announced over general and minority newspapers and broadcast media, where available and appropriate.

Our City Administrator's Office contacts leaders in affected communities directly and solicits their participation. The office maintains records of all such notices and the efforts made to reach the affected community.

To ensure that the community is effectively informed of and able to participate in public hearings, our City Recorder's Office advertises public notices in appropriate languages

when a significant number or proportion of the affected community has limited English proficiency. Such notices will include direction for obtaining an interpreter free of charge for the public hearing. 28 CFR § 42.405(d)

For Federal Aviation Administration Complaints:

A complainant may also file a complaint directly with the Federal Aviation Administration

For ODOT Transportation Complaints:

A complainant may also file a complaint directly with the Federal Transit Administration: Office of Civil Rights, Attn: Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

A complainant may also file a complaint directly with the Oregon Department of Transportation: Office of Civil Rights-MS 23, 3930 Fairview Industrial Drive SE, Salem, OR 97302.

If information is needed in another language contact the City Recorder at 541-475-2344.  
Si se necesita información en otro contacto de lenguas de la grabadora Ciudad al 541-475-2344.



# THE CITY OF MADRAS

## TITLE VI COMPLAINT FORM

<b>Section I:</b>			
Name:			
Address:			
Telephone (Home):		Telephone (Work):	
Electronic Mail Address:			
Accessible Format Requirements?	Large Print		Audio Tape
	TDD		Other
<b>Section II:</b>			
Are you filing this complaint on your own behalf?		Yes*	No
*If you answered "yes" to this question, go to Section III.			
If you answered "no", please supply the name and relationship of the person for whom you are complaining:			
Please 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
<b>Section III:</b>			
I believe the discrimination I experienced was based on (check all that apply):			
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin			
<input type="checkbox"/> Other _____			
Date of Alleged Discrimination (Month, Day, Year): ___/___/___			

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.

**Section IV:**

Have you previously filed a Title VI complaint with this agency?	Yes		No	
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**Section V:**

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?	Yes		No	
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If yes, check all that apply:

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

Federal Court: \_\_\_\_\_

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

State Court: \_\_\_\_\_

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

Please provide information about a contact person at the agency/court where the complaint was filed.

Name:	Agency:
Title:	Telephone:
Address:	

**Section VI:**

Name of agency complaint is against:
Contact person:
Title:
Telephone number:

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date required below:

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

*Please submit this form in person at the address below, or mail this form to:*

City of Madras  
City Recorder  
125 SW E Street  
Madras, OR 97741



**RECORD OF TITLE VI OR OTHER CIVIL RIGHTS  
INVESTIGATIONS, COMPLAINTS OR LAWSUITS**

Transit-Related Title VI Investigations, Complaints and Lawsuits List:

*To-date, there have been no Title VI investigations, complaints or lawsuits.*

	Date	Summary (include compliant basis: race, color, or national origin)	Status	Action(s) Taken
<b>Investigations</b>				
1.				
<b>Lawsuits</b>				
1.				
<b>Complaints</b>				
1.				

FAA-Related Title VI Investigations, Complaints and Lawsuits List:

*To-date, there have been no Title VI investigations, complaints or lawsuits.*

	Date	Summary (include compliant basis: race, color, or national origin)	Status	Action(s) Taken
<b>Investigations</b>				
1.				
<b>Lawsuits</b>				
1.				
<b>Complaints</b>				
1.				

## **PUBLIC PARTICIPATION PLAN**

Community Outreach is a requirement of Title VI under 49 USC Sections 5307 (b) and 5307 (c)(1)(I). Recipients have wide latitude to determine what specific measures are most appropriate and should make this determination based on the composition of the affected population, the public involvement process, and the resources of the City. The City also follows public notification regulations as required by any federal funds received. Examples of how the City strives to meet this requirement are as follows:

- Provides for early, frequent and continuous engagement and comment periods with the public in its planning and decision-making processes (including but not limited to transportation, parks/open space, airport, water, wastewater, housing and economic development initiatives)
- Promotes inclusive participation of low-income, minority, and people with disabilities.
- Utilizes various forms of media and communication outlets to maximize the demographic reached (i.e. social media sites, local printed newspaper, radio stations – and doing so in both English and Spanish).
- Selects various meeting locations, days and times to best accommodate the largest portions of the community.

Our website includes our Title VI Program, Title VI Compliance Statement, and Complaint Form. The City's Title VI Compliance Statement and complaint form are also posted at City Hall (located at 125 SW E Street, Madras, OR 97741). Individuals who believe they have been discriminated against may request a complaint form from the City Recorder.

## **LIMITED ENGLISH PROFICIENCY (LEP) PLAN**

The City of Madras is committed to breaking down language barriers by implementing consistent standards of language assistance across its service area.

The United States is home to millions of national origin minority individuals with Limited English Proficiency (LEP). That is, their primary language is not English, and they cannot speak, read, write or understand the English language at a level that permits them to interact effectively with recipients of Federal financial assistance.

Because of language differences and the inability to effectively speak or understand English, persons with LEP may be subject to exclusion from programs or activities, experience delays or denials of services. These individuals may be entitled to language

assistance with respect to a service. The federal government and those receiving assistance from the federal government must take reasonable steps to ensure that LEP persons have meaningful access to the programs, services, and information those entities provide. This will require agencies to establish solutions to address the needs of this growing population of individuals, for whom English is not their primary language.

## **LEP FOUR FACTOR ANALYSIS & IMPLEMENTATION LANGUAGE ASSISTANCE PLAN**

### **Factor No. 1: Demography.**

The City of Madras is largely English speaking. Most of the population with which we interact is proficient in English. According to the 2017 American Community Survey, 68% of Oregon's population age five and up speaks English, while 32% of the community predominantly speak Spanish.

### **Factor No. 2. Frequency.**

Contacts with the City of Madras are made at City Hall and through our website, [www.ci.madras.or.us](http://www.ci.madras.or.us). The City of Madras currently has two full time administrative staff members that speak fluent Spanish – the Customer Accounting Clerk and the Associate Planner. The Customer Accounting Clerk is seated at the front counter and interacts with customers regularly. She can provide both translation and interpretation services for our agency daily. On average, nearly 30 percent of our customer contacts would otherwise require translation services if we didn't have someone on staff that spoke Spanish. In addition, the City partners with Certified Languages International to provide translation services as necessary.

### **Factor No. 3: Importance.**

The City of Madras provides important mobility management and transportation coordination services to the public through Cascades East Transit and a contract with Central Oregon Intergovernmental Council which runs the program. In addition, the City receives funding assistance including (but not limited to) the Oregon Department of Transportation, the Federal Aviation Administration, and the Community Development Block Grant Program.

### **Factor No. 4. Resources and Costs.**

The City's current in-house language capabilities are English and Spanish and can be expanded to other languages with the use of contractual translation services. The City has the resources and ability to obtain additional language capabilities through external third parties as needed (i.e. contractually sourced for translators, sign language, etc.)

## **Implementation of Plan.**

As stated in DOT Notice 2001-8696 (FR22ja01-233) transportation is considered an essential service to participation in modern society. Therefore, we have made the following plans to provide translation services free of charge to ensure that individuals with LEP have access to the benefits of the airport and the public transportation system:

- 1) The City of Madras reviews its implementation plan annually, including any contacts with LEP persons, to determine the frequency of contacts, the language used, and how the contacts were handled.
- 2) All written notices contain a statement in the identified languages, when appropriate, of how to receive translated written materials and/or to arrange for a translator at a public meeting.
- 3) We have a significant community of Spanish speaking individuals with Limited English Proficiency (LEP). Therefore, all public notices and broadcasts are issued in English with a reference made in Spanish to contact the office of primary responsibility for a translation if required. Information regarding translation services can be obtained at City Hall and from the General Aviation Building.
- 4) The City Administrator's Office maintains a list of bilingual and multilingual employees, the languages they speak, and their associated office telephone numbers. The list is updated annually in the Public Information Handbook and provided to all airport employees. Generally, these employees are available to assist the public during normal business hours.
- 5) In addition, the City contracts with Certified Languages International to provide on demand telephone interpretation services to beneficiaries – which is also available at the airport.
- 6) Efforts are underway to contract for written translations should the need arise.
- 7) Bus schedules for Cascades East Transit are available at City Hall and contain Title VI language.

On an annual basis, all City employees will be trained to provide language assistance to LEP persons. This training will occur in the form of review of this policy annually and each employee will sign an acknowledgement of understanding that they've reviewed the policy.

In addition to the above noted efforts, the City's Diversity and Inclusion Action Plan supports the overall efforts of this plan.

## COMMUNITY STATISTICS

Several regulations relating to Title VI of the Civil Rights Act of 1964 require federal grant recipients to know the community demographics. Within a 50-mile radius of Madras, three counties are encompassed – Jefferson County (where Madras resides), Crook and Deschutes Counties.

**Low Income Communities:** A low-income area is an identifiable group of persons living in geographic proximity whose median household income is at or below the Department of Health and Human Services poverty guidelines. According to a 1999 U.S. Census Report the overall poverty level for the state is approximately 13.2%. The state poverty rate remains one of the lowest in the country. Based on the 2018 U.S. Census estimates, we found the poverty rate in Jefferson County to be 17.2%, Crook County to be 13.3%, and Deschutes County to be 9.7%.

## MINORITY REPRESENTATION TABLE

**Limited English Proficiency:** The following languages are the top 5 spoken in homes (by individuals who believe they “do not speak English well”) in the State, County, and then those that represent the Madras City Council.

The City of Madras is overseen by an elected City Council. The table below depicts Council membership as of July 2019. As a result of the lack of diversity in both the City’s staff and its elected officials, the City adopted a Diversity and Inclusion Action Plan in Summer 2017. The Diversity Plan outlines goals, objectives and action items for the agency to focus on to help further diversity and be more inclusive of the more culturally diverse portions of the Madras community.

	<b>Caucasian</b>	<b>Hispanic or Latino (of any race)</b>	<b>Black or African American</b>	<b>Asian</b>	<b>Native Hawaiian</b>	<b>American Indian or Alaskan Native</b>	<b>Two or more races</b>
<b>Oregon</b> (2018 Est. Census)	86.8%	13.3%	2.2%	4.8%	.5%	1.8%	3.9%
<b>Jefferson County</b> (2018 Est. Census)	<b>75.4%</b>	<b>20.2%</b>	1.4%	.8%	.3%	<b>18.8%</b>	3.4%
<b>Madras City Council</b>	83%	0%	0%	17%	0%	0%	0%

## TITLE VI (FACILITY LOCATION) EQUITY ANALYSIS

In the event the City plans to acquire land to construct certain types of facilities, it will not discriminate based on race, color, or national origin, against persons who may, as a result of the construction, be displaced from their homes or businesses.

During the planning phases of any such event, attention will be paid to equity and no-discrimination through equity analysis. The analysis will be done before the selection of the preferred site.

When evaluating locations, the City will investigate other facilities that have been built in the area with similar impact to determine if there are any cumulative adverse impacts.

If the selected location of the constructed facility results in “disparate treatment” the City will show both substantial legitimate justification for locating the facility there and evidence that there are no alternative locations.