

Northern Oklahoma Development Authority

Dbas: Cherokee Strip Transit

Title VI Program

Date filed with ODOT Transit Division Programs:

(September 22, 2022)

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A. Introduction

Northern Oklahoma Development Authority (NODA), agrees to comply with all provisions prohibiting discrimination on the basis of race, color, or national origin of Title VI of the Civil Rights Act of 1964, as amended, 42 U.S.C. 200d *et seq.*, and with U.S. DOT regulations, “Nondiscrimination in Federally-Assisted Programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act,” 49 CFR part 21.

Northern Oklahoma Development Authority assures that no person shall, as provided by Federal and State civil rights laws, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity. Northern Oklahoma Development Authority further ensures every effort will be made to ensure non-discrimination in all programs and activities, whether those programs and activities are federally funded or not.

Northern Oklahoma Development Authority meets the objectives of the FTA Master Agreement which governs all entities applying for FTA funding, including Cherokee Strip Transit and its third-party contractors by promoting actions that:

- A. Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin.
- B. Identify and address, as appropriate, disproportionately high and adverse effects of programs and activities on minority populations and low-income populations.
- C. Promote the full and fair participation of all affected Title VI populations in transportation decision making.
- D. Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations.
- E. Ensure meaningful access to programs and activities by persons with Limited English Proficiency (LEP).

B. Agency Information

1. Mission of Cherokee Strip Transit

The main office is located in Garber with satellite offices in Perry, Tonkawa, Watonga, Cherokee, Blackwell, Medford, and Kingfisher. CST vehicles provide transportation for shopping, medical needs, and schooling in the counties served.

2. History

In 1991, Cherokee Strip Transit (CST), originally known as Garber Elderly Transportation Systems (GETS) began meeting the basic transportation needs of elderly clients in eastern Garfield County. With the great demand for public transportation, CST has seen many changes and expansion of services due to signing a contract with the Oklahoma Department of Transportation in 1995, and with the merger with NODA in March 1999.

3. Regional Profile

| NODA Region Population and Projections | | | | | | | | | |
|----------------------------------------|---------|--------|----------|-------|--------|------------|-------|--------|---------|
| | Alfalfa | Blaine | Garfield | Grant | Kay | Kingfisher | Major | Noble | Total |
| 2000 | 6,105 | 11,976 | 57,813 | 5,144 | 48,080 | 13,926 | 7,545 | 11,411 | 162,000 |
| 2010 | 5,642 | 11,943 | 60,580 | 4,527 | 46,562 | 15,034 | 7,527 | 11,561 | 163,376 |
| 2020 | 5,699 | 8,735 | 62,846 | 4,169 | 43,700 | 15,184 | 7,782 | 10,924 | 159,039 |
| 2030 | 5,129 | 8,830 | 61,328 | 3,452 | 43,111 | 15,453 | 7,184 | 11,068 | 155,555 |
| 2040 | 4,776 | 7,936 | 61,718 | 2,866 | 41,731 | 15,835 | 6,933 | 10,990 | 152,785 |

4. Population served

Cherokee Strip Transit serves a population of 151,257 within their 7 county service area - 95% of NODA's regional population.

5. Service area

See map in Appendix 1.

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

| Table Depicting Membership of Committees, Councils, By Race | | | | | |
|-------------------------------------------------------------|-----------|--------|------------------|----------------|-------|
| Committee | Caucasian | Latino | African American | Asian American | Total |
| Population Committee | 21 | 0 | 0 | 0 | 21 |

Section 1, Trustees, of Article III, Terms of Office, of the Northern Oklahoma Development Authority bylaws reads as follows,

(a) Trustees appointed to represent Alfalfa, Garfield, Kingfisher, and Noble counties will be appointed initially to serve until June 30. Thereafter, their successors shall be appointed for two year terms beginning July 1, of odd numbered years.

(b) Trustees appointed to represent Blaine, Grant, Kay, and Major counties will be appointed initially to serve until June 30. Thereafter, their successors shall be appointed for two year terms beginning June 1, of even numbered years.

(c) Trustees appointed to represent cities and towns in Blaine, Grant, Kay, and Major counties will be appointed initially to serve until June 30. Thereafter, their successors shall be appointed for two year terms beginning June 1, of odd numbered years.

(d) Trustees appointed to represent cities and towns in Alfalfa, Garfield, Kingfisher and Noble counties will be appointed initially to serve until June 30. Thereafter, their successors shall be appointed for two year terms beginning June 1, of even numbered years.

(e) Trustees appointed to represent conservation districts will be appointed in the same manner as trustees representing counties.

(f) The at-large trustees shall serve initially until June 30. The successor at-large Trustee shall thereafter be elected annually for a one (1) year term at the May meeting of the Board of Trustees.

(g) All trustees will serve as indicated above, except that their terms shall continue until their successors take office. A vacancy during a Trustee's term of office will be filled in the same manner as the Trustee was originally appointed. Trustees may succeed themselves in office.

(h) All trustees will be confirmed by a vote of the NODA Board of Trustees, whose decision is final.

C. Notice to the Public

NOTIFYING the PUBLIC of RIGHTS UNDER TITLE VI Cherokee Strip Transit

- The Cherokee Strip Transit operates its programs without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the Cherokee Strip Transit.
- For more information on the Cherokee Strip Transit's civil rights program, and procedures to file a complaint, contact 580-863-2279, 800-722-0353; email rita@noda-ok.org; or visit our administrative office at 2901 N. Van Buren, Enid, Oklahoma 73703.
- A complainant may file a complaint directly with the Oklahoma Department of Transportation by filing a complaint with the Compliance Division, Attention: Compliance Division Manager, 200 NE 21st Street, Room 1C1, Oklahoma City, OK 73105-3204.
- If information is needed in another language contact: 580-863-2279

Posting of Title VI Information

NODA/ Cherokee Strip Transit Facilities

NODA Main Office:

Northern Oklahoma Development
Authority
2901 N. Van Buren
Enid, OK 73738
580-237-4810

Cherokee Strip Transit Main Office

Garber:

622 Comanche
Box 344
Garber, OK 73738
Telephone 580-863-2279
863-2278
Fax: (580) 863-2277

Kingfisher:

Kingfisher Cemetery Building
Municipal Cemetery (South Side)
14214 State Highway 33
Kingfisher, OK 73750
Telephone# (405) 375-3512
Fax: (405) 375-3515
City of Kingfisher-Property owned

Perry:

Cherokee Strip Transit
612 Jim Davis Ave
Perry, OK 73077
Telephone: (580) 336-5771
Fax: (580) 336-4897
Located at Perry Wheatheart

Tonkawa:

Cherokee Strip Transit
118 South Seventh
Tonkawa, OK 74653
Telephone: (580) 628-3316
Fax: (580) 628-2100
Located in Tonkawa Wheatheart

Watonga:

Cherokee Strip Transit
119 N. Grand Ave
Watonga, OK 73772
Telephone# (580) 623-3000
623-2501
** Located in Blaine Co. Courthouse

Blackwell

Blackwell CST
402 W. Blackwell
Blackwell, OK 74653
Telephone # 580-363-7221
Fax# 580-363-7222
** Located in Blackwell Sr. Citizen

**** ALSO POSTED IN EACH OF VEHICLES and on the NODA website**

D. Procedure for Filing a Title VI Complaint

Filing a Title VI Complaint

The complaint procedures apply to the beneficiaries of Cherokee Strip Transit 's programs, activities, and services.

RIGHT TO FILE A COMPLAINT: Any person who believes they have been discriminated against on the basis of race, color, or national origin by Cherokee Strip Transit may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. Title VI complaints must be received in writing within 180 days of the alleged discriminatory complaint.

HOW TO FILE A COMPLAINT: Information on how to file a Title VI complaint is posted on our agency's website, and in public areas of our agency.

You may download the Cherokee Strip Transit Title VI Complaint Form at <https://noda-ok.org/title-vi-complaint-procedures/> or request a copy by writing to 2901 N. Van Buren, Enid, Oklahoma 73703. Information on how to file a Title VI complaint may also be obtained by calling Cherokee Strip Transit at 580-863-2279.

See Attachment 4 for copy of the Title VI Compliant form.

You may file a signed, dated complaint no more than 180 days from the date of the alleged incident. The complaint should include:

- Your name, address and telephone number.
- Specific, detailed information (how, why and when) about the alleged act of discrimination.
- Any other relevant information, including the names of any persons, if known, the agency should contact for clarity of the allegations.

Please submit your complaint form to 2901 N. Van Buren, Enid, Oklahoma 73703, or email rita@noda-ok.org.

COMPLAINT ACCEPTANCE: Cherokee Strip Transit will process complaints that are complete.

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

INVESTIGATIONS: Cherokee Strip Transit will generally complete an investigation within 90 days from receipt of a completed complaint form. If more information is needed to resolve the case, NODA's Title VI Coordinator may contact the complainant. Unless a longer period is specified by NODA's Title VI Coordinator, the complainant will have ten (10) days from the date of the letter to send requested information to Cherokee Strip Transit investigator assigned to the case.

If the requested information is not received within that timeframe the case will be closed. Also, a case can be administratively closed if the complainant no longer wishes to pursue the case.

LETTERS OF CLOSURE OR FINDING: After the Title VI investigator reviews the complaint, the Title VI investigator will issue one of two letters to the complainant: a closure letter or letter of finding (LOF).

- A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.
- A Letter of Finding (LOF) summarizes the allegations and provides an explanation of the corrective action taken.

If the complainant disagrees with Cherokee Strip Transit 's determination, the complainant may request reconsideration by submitting the request in writing to the Title VI investigator within seven (7) days after the date of the letter of closure or letter of finding, stating with specificity the basis for the reconsideration. Cherokee Strip Transit will notify the complainant of the decision either to accept or reject the request for reconsideration within ten (10) days. In cases where reconsideration is granted, Cherokee Strip Transit will issue a determination letter to the complainant upon completion of the reconsideration review.

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

If information is needed in another language, contact Rita Kroll at 2901 N. Van Buren, Enid, Oklahoma, 73703, or at 580-863-2279.

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

Documenting Title VI Complaints/Investigations

All Title VI complaints will be entered and tracked in Cherokee Strip Transit’s complaint log. Active investigations will be monitored for timely response on the part of all parties. The agency’s Title VI Coordinator shall maintain the log.

Agency Title VI Complaint Log

| Date complaint filed | Complainant | Basis of complaint R-C-NO | Summary of allegation | Pending status of complaint | Actions taken | Closure Letter (CL) | Letter of Finding (LOF) | Date of CL or LOF |
|----------------------|-------------|---------------------------|-----------------------|-----------------------------|---------------|---------------------|-------------------------|-------------------|
| N/A | | | | | | | | |
| N/A | | | | | | | | |
| N/A | | | | | | | | |
| N/A | | | | | | | | |
| N/A | | | | | | | | |

Documenting Evidence of Agency Staff Title VI Training

Cherokee Strip Transit’s staff is given Title VI training, and agency can answer affirmatively to all the following questions:

1. Are new employees made aware of Title VI responsibilities pertaining to their specific duties?
2. Do new employees receive this information via employee orientation?
3. Is Title VI information provided to all employees and program applicants?
4. Is Title VI information prominently displayed in the agency and on any program materials distributed, as necessary?

Public Participation Plan

Goal

The goal of the Public Participation Plan is to have significant and ongoing public involvement, by all identified audiences, in the public participation process for major agency outreach efforts.

Objectives

- To understand the service area demographics and determine what non-English languages and other cultural barriers exist to public participation.
- To provide general notification of meetings and forums for public input, in a manner that is understandable to all populations in the area.
- To hold public meetings in locations that are accessible to all area stakeholders, including but not limited to minority and low income members of the community.
- To provide methods for two-way communication and information and input from populations which are less likely to attend meetings.
- To convey the information in various formats to reach all key stakeholder groups.

Identification of Stakeholders

Stakeholders are those who are either directly or indirectly affected by an outreach effort, system or service plan or recommendations of that plan. Stakeholders include but are not limited to the following:

- Board of Directors – the governing board of the agency. The role of the Board is to establish policy and legislative direction for the agency. The Board defines the agency's mission, establishes goals, and approves then budget to accomplish the goals.
- Advisory Bodies – non-elected advisory bodies review current and proposed activities of the agency, and are encouraged to be active in the agency's public participation process. Advisory bodies provide insight and feedback to the agency.
- Agency Transit riders and clients
- Minority and low income populations, including limited English proficient persons
- Local jurisdictions and other government stakeholders
- Private businesses and organizations
- Employers
- Partner agencies

Elements of the Public Participation t Plan

It is necessary to establish a public participation plan that includes an outreach plan to engage minority and limited English proficient (LEP) populations.

Elements of the Public Engagement Plan include:

1. Public Notice

- a. Official notification of intent to provide opportunity for members of the general public to participate in public engagement plan development, including participation in open Board/council meetings, and advisory committees.

2. Public Engagement Process/Outreach Efforts:

- a. Public meetings
- b. Open houses
- c. Rider forums
- d. Rider outreach
- e. Public hearings
- f. Focus groups
- g. Surveys
- h. Services for the Disabled (Notices of opportunities for public involvement include contact information for people needing these or other special accommodations.)

Events such as public meetings and/or open houses are held at schools, churches, libraries and other non-profit locations easily accessible to public transit and compliant with the Americans with Disabilities Act.

3. Public Comment

- a. Formal public comment periods are used to solicit comments on major public involvement efforts around an agency service or system change.
- b. Comments are accepted through various means:
 - i. Dedicated email address.
 - ii. Website.
 - iii. Regular mail.
 - iv. Forms using survey tool for compilation.
 - v. Videotaping.
 - vi. Phone calls to Customer Service Center [phone]

4. Response to Public Input

All public comments are provided to the Board of Directors prior to decision making. A publicly available summary report is compiled, including all individual comments.

Title VI Outreach Best Practices

Cherokee Strip Transit ensures all outreach strategies, communications and public involvement efforts comply with Title VI. The Northern Oklahoma Development Authority has adopted the Northern Oklahoma Regional Transportation Planning Organizations (NORTPO) Public Participation Plan for Cherokee Strip Transit. The Public Participation Plan proactively initiates the public involvement process and makes concerted efforts to involve members of all social,

economic, and ethnic groups in the public involvement process. Aligned with the above referenced communication tactics, Cherokee Strip Transit provides the following:

- a. Public notices published in non-English publications (if available).
- b. Title VI non-discrimination notice on agency's website.
- c. Agency communication materials in languages other than English (subject to Safe Harbor parameters).
- d. Services for Limited English Proficient persons. Upon advance notice, translators may be provided.

2019 – 2023 Title VI Program Public Participation Process

NORTPO has conducted a Public Participation Process for the 2019-2023 Title VI Program. This process includes Community Meetings to seek input, provide education, and highlight key components of the Title VI Plan. Materials have been created to explain Title VI policies as well as provide education on how they relate to minority populations.

Cherokee Strip Transit **has provided** briefings to the Board of Directors and Advisory Bodies.

NORTPO **has conducted** a 30 day public comment period to provide opportunities for feedback on the 2019-2023 Title VI Program.

Comments are accepted during the public outreach period via:

- a. Email
- b. Mail
- c. Phone
- d. In person
- e. Survey tool

Summary of 2019-2023 Public Outreach Efforts

NODA holds monthly meetings at their administrative offices in Enid which are open to the public and advertised with special accommodation notices 72 hours in advance.

Additionally, prior to each annual recertification cycle CST holds public meetings in each of the counties they service to invite feedback on their system. These meetings are open to the public and key stakeholders and agencies from the region are invited to attend.

F. Language Assistance Plan

Cherokee Strip Transit Limited English Proficiency Plan

This limited English Proficiency (LEP) Plan has been prepared to address Cherokee Strip Transit's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964; Federal Transit Administration Circular 4702.1B, dated October 1, 2012, which states that the level and quality of transportation service is provided without regard to race, color, or national origin.

Executive order 13166, titled "Improving Access to Services for Persons with Limited English Proficiency," indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discriminations do not take place. This order applies to all state and local agencies which receive federal funds.

Cherokee Strip Transit services the Counties of Alfalfa, Blaine, Garfield, Grant, Kay, Kingfisher, and Noble

Cherokee Strip Transit has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided by Cherokee Strip Transit. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify a person who may need language assistance, and the ways in which assistance may be provided. In September FY 2023, NODA adopted the Northern Oklahoma Regional Transportation Planning Organization's LEP Plan for CST to abide by all Title VI compliances outlined within the plan.

In order to prepare this plan, Cherokee Strip Transit undertook the **four-factor LEP analysis** which considers the following factors:

Four Factor Analysis

1. The number and proportion of LEP persons eligible to be served or likely to be encountered in the service area:

A significant majority of people in the Cherokee Strip Transit service area are proficient in the English language. Based on 2020 Census data, 8.9% of the population five years of age and older speak English "less than very well" – a definition of limited English proficiency.

| Languages Spoken by County - Cherokee Strip Transit Service Area | | | | | | | | | | | | | | | | |
|------------------------------------------------------------------|---------|-------|--------|-------|----------|-------|-------|-------|--------|-------|------------|-------|--------|-------|---------|------------|
| | Alfalfa | | Blaine | | Garfield | | Grant | | Kay | | Kingfisher | | Noble | | Total | % of Total |
| | Total | % | Total | % | Total | % | Total | % | Total | % | Total | % | Total | % | | |
| Population 5 years and over | 5,535 | | 9,038 | | 57,466 | | 4,153 | | 41,441 | | 14,615 | | 10,624 | | 142,872 | |
| English only | 5,232 | 94.5% | 8,040 | 89.0% | 50,098 | 87.2% | 4,038 | 97.2% | 38,846 | 93.7% | 12,403 | 84.9% | 10,418 | 98.1% | | |
| Speaks English less than "very well" | 121 | 2.2% | 538 | 6.0% | 3,774 | 6.6% | 27 | 0.7% | 754 | 1.8% | 820 | 5.6% | 89 | 0.8% | 6,123 | 4.3% |
| Spanish | 236 | 4.3% | 911 | 10.1% | 5,064 | 8.8% | 91 | 2.2% | 1,936 | 4.7% | 2,127 | 14.6% | 108 | 1.0% | | |
| Speaks English less than "very well" | 106 | 1.9% | 533 | 5.9% | 2,569 | 4.5% | 18 | 0.4% | 616 | 1.5% | 801 | 5.5% | 66 | 0.6% | 4,708 | 3.3% |
| Other Indo-European languages | 45 | 0.8% | 34 | 0.4% | 290 | 0.5% | 12 | 0.3% | 277 | 0.7% | 40 | 0.3% | 34 | 0.3% | | |
| Speaks English less than "very well" | 13 | 0.2% | 5 | 0.1% | 20 | 0.0% | 0 | 0.0% | 54 | 0.1% | 6 | 0.0% | 7 | 0.1% | 105 | 0.1% |
| Asian and Pacific Islander languages | 14 | 0.3% | 0 | 0.0% | 1,710 | 3.0% | 12 | 0.3% | 102 | 0.2% | 41 | 0.3% | 8 | 0.1% | | |
| Speaks English less than "very well" | 0 | 0.0% | 0 | 0.0% | 1,129 | 2.0% | 9 | 0.2% | 28 | 0.1% | 9 | 0.1% | 6 | 0.1% | 1,181 | 0.8% |
| Other languages | 8 | 0.1% | 53 | 0.6% | 304 | 0.5% | 0 | 0.0% | 280 | 0.7% | 4 | 0.0% | 56 | 0.5% | | |
| Speaks English less than "very well" | 2 | 0.0% | 0 | 0.0% | 56 | 0.1% | 0 | 0.0% | 56 | 0.1% | 4 | 0.0% | 11 | 0.1% | 129 | 0.1% |
| Total | | | | | | | | | | | | | | | | |
| Speaks English less than "very well" | 242 | | 1,076 | | 7,548 | | 54 | | 1,508 | | 1,640 | | 178 | | 12,246 | |
| Percent of total | | | | | | | | | | | | | | | 8.60% | |

Source: 2020 ACS Data

2. Frequency of Contact by LEP Persons with Cherokee Strip Transit 's Services:

The Cherokee Strip Transit staff reviewed the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP persons. To date, Cherokee Strip Transit has had one documented request for a NORTPO survey to be delivered in Spanish. Cherokee Strip Transit averages 0 phone calls per month. Following the adoption of this plan all requests made by persons experiencing LEP will be recorded by CST staff using the LEP Reporting Form in the adopted LEP Plan.

LEP Staff Survey Form

Cherokee Strip Transit is studying the language assistance needs of its riders so that we can better communicate with them if needed.

1. How often do you come into contact with passengers who do not speak English or have trouble understanding you when you speak English to them?

DAILY WEEKLY MONTHLY LESS THAN MONTHLY

2. What languages do these passengers speak?
3. What languages (other than English) do you understand or speak?
4. Would you be willing to serve as a translator when needed?

Frequency of Contact with LEP Persons

| Frequency | Language Spoken by LEP Persons |
|------------------------------|--------------------------------|
| Daily | |
| Weekly | |
| Monthly | |
| Less frequently than monthly | Spanish |

3. The importance of programs, activities or services provided by Cherokee Strip Transit to LEP persons:

Outreach activities, summarized in Cherokee Strip Transit 's Title VI Public Engagement Plan, include events such as public meetings and/or open houses held at schools, churches, libraries and other non-profit locations, and include specific outreach to LEP persons to gain understanding of the needs of the LEP population, and the manner (if at all) needs are addressed.

Outside Organization LEP Survey

Organization: _____

1. What language assistance needs are encountered?
2. What languages are spoken by persons with language assistance needs?
3. What language assistance efforts are you undertaking to assist persons with language assistance needs?
4. When necessary, can we use these services?

4. The resources available to Cherokee Strip Transit and overall cost to provide LEP assistance:

Strategies for Engaging Individuals with Limited English Proficiency include:

1. Language line. Upon advance notice, translators can be provided.
2. Language identification flashcards.
3. Written translations of vital documents (identified via safe harbor provision)
4. One-on-one assistance through outreach efforts.
5. Website information.
6. To the extent feasible, assign bilingual staff for community events, public hearings and Board of Directors meetings and on the customer service phone lines.

Based on our demographic analysis (Factor 1) Cherokee Strip Transit has determined that no language group(s) within its service area meets Safe Harbor criteria requiring written translated "vital documents" by language group(s).

Cherokee Strip Transit will provide assistance and direction to LEP persons who request assistance.

Staff LEP Training

The following training will be provided to Cherokee Strip Transit staff:

1. Information on Cherokee Strip Transit Title VI Procedures and LEP responsibilities.
2. Description of language assistance services offered to the public.
3. Use of Language Identification Flashcards.
4. Documentation of language assistance requests.

Monitoring and Updating the LEP Plan

The LEP Plan is a component of Cherokee Strip Transit 's Title VI Plan requirement.

Cherokee Strip Transit will update the LEP plan as required. At minimum, the plan will be reviewed and updated when it is clear that higher concentrations of LEP individuals are present in the Cherokee Strip Transit service area. Updates include the following:

1. How the needs of LEP persons have been addressed.
2. Determine the current LEP population in the service area.
3. Determine as to whether the need for, and/or extent of, translation services has changed.
4. Determine whether local language assistance programs have been effective and sufficient to meet the needs.
5. Determine whether Cherokee Strip Transit 's financial resources are sufficient to fund language assistance resources as needed.
6. Determine whether Cherokee Strip Transit has fully complied with the goals of this LEP Plan.
7. Determine whether complaints have been received concerning Cherokee Strip Transit 's failure to meet the needs of LEP individual.

G. Advisory Bodies

Table Depicting Membership of Committees, Councils, By Race

| Committee [examples] | Caucasian | Latino | African American | Asian American | | Total |
|---------------------------------|------------------|---------------|-----------------------------|---------------------------|--|--------------|
| Population Committee | 21 | 0 | 0 | 0 | | 100% |
| Access Committee | 0 | 0 | 0 | 0 | | 0% |
| Citizens Advisory Council | 0 | 0 | 0 | 0 | | 0% |

Description of efforts made to encourage minority participation on committees:

- Engaging with tribal governments to inform them of the Board and the services NODA provides to members.

H. Sub recipient Assistance

Sub recipient Assistance

OPTION A

Cherokee Strip Transit does not have any sub recipients.

I. Sub recipient Monitoring

Sub recipient Monitoring

OPTION A

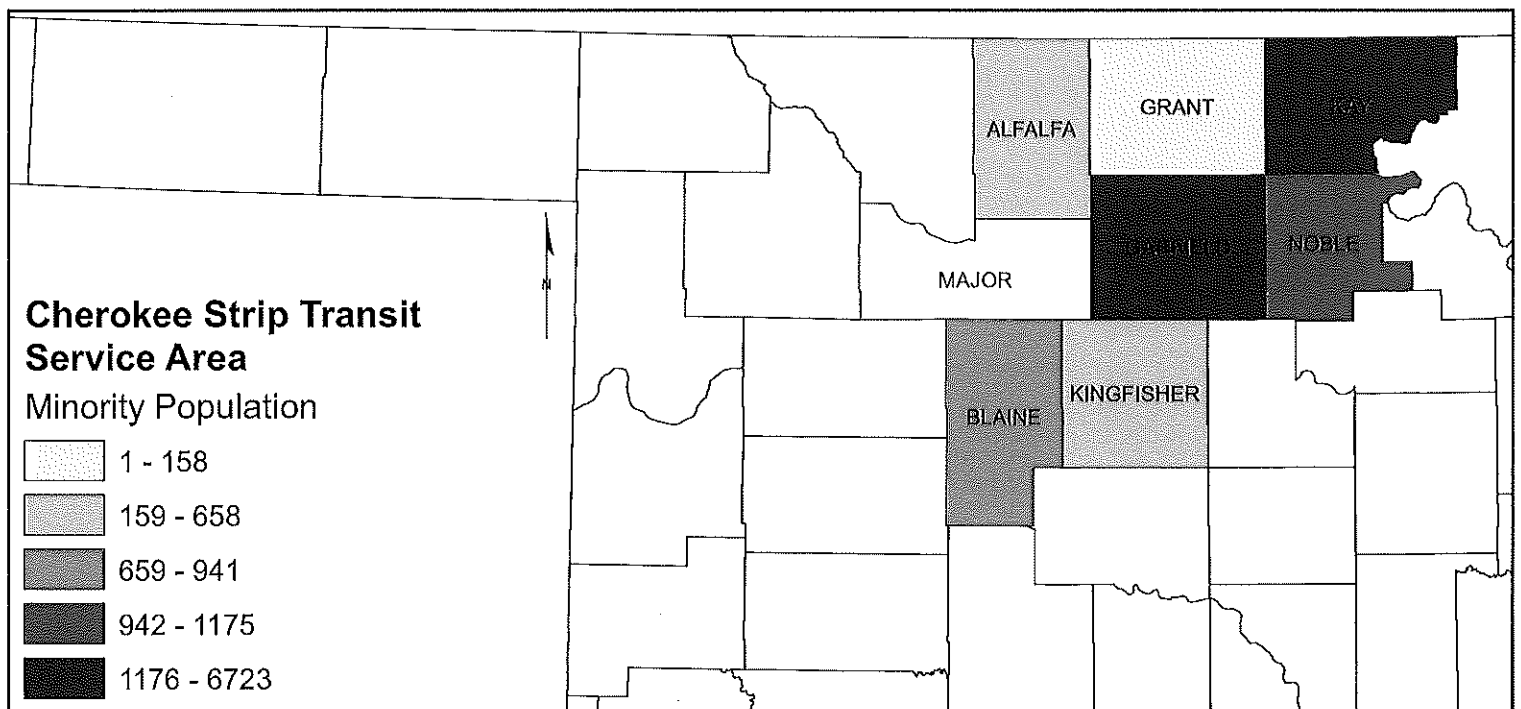
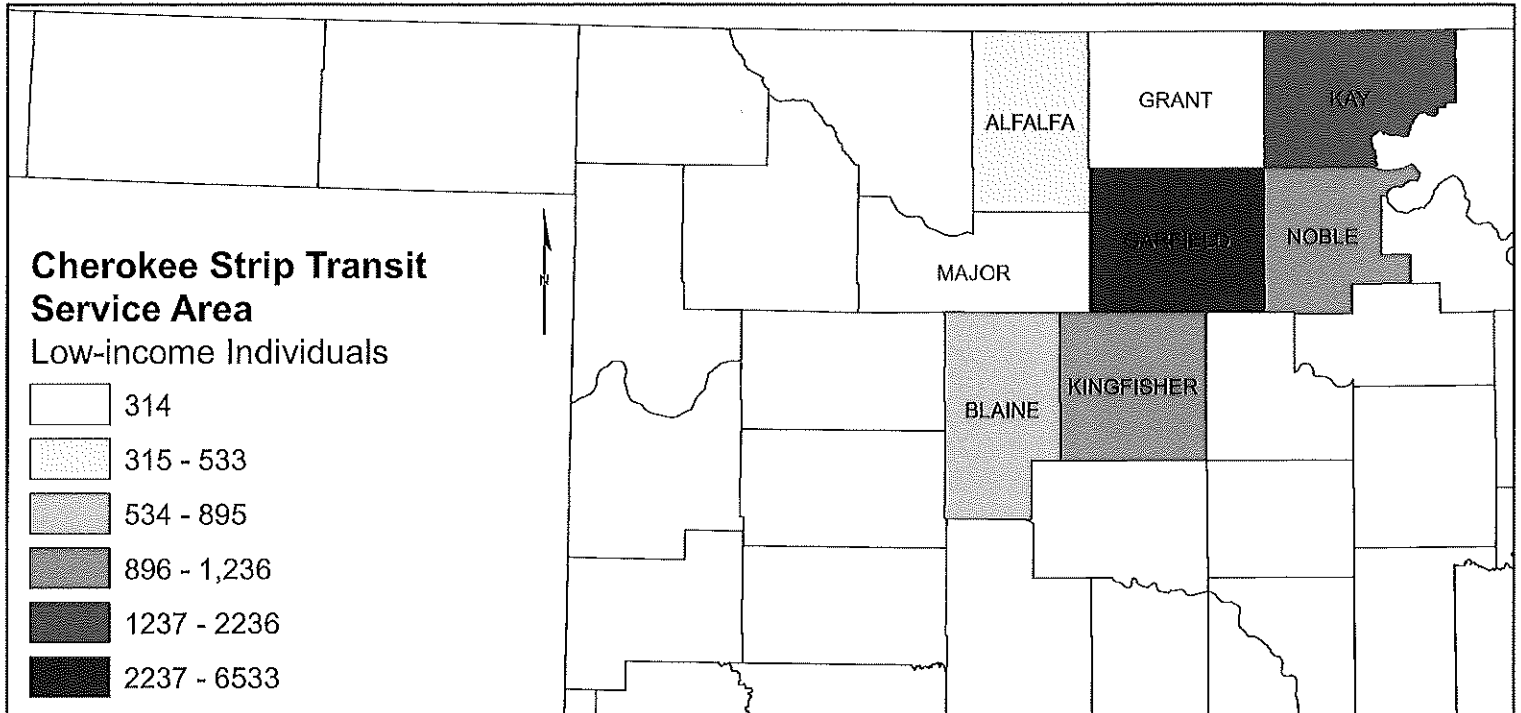
Cherokee Strip Transit does not have any sub recipients.

J. Equity Analysis of Facilities

Cherokee Strip Transit has not constructed any storage facilities, maintenance facilities, or operations centers in the last three years.

Equity Analysis of Cherokee Strip Transit Service Area

Alfalfa, Grant, Kay, Garfield, Noble, Blaine, Kingfisher



Data represented as totals. Source 2020 ACS, Decennial Census.

**RESOLUTION OF THE
NORTHERN OKLAHOMA DEVELOPMENT AUTHORITY
A LOCAL COUNCIL OF GOVERNMENTS
APPROVING
TITLE VI PROGRAM PLAN**

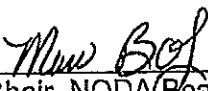
WHEREAS, the Northern Oklahoma Development Authority (NODA) was established to serve as the planning organization and to provide guidance to local governments. This includes the counties of Alfalfa, Blaine, Garfield, Grant, Kay, Kingfisher, Major, and Noble.

WHEREAS, Title VI of the Civil Rights Act of 1964, guides the Title VI Program at NODA, and

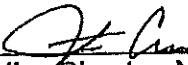
WHEREAS, Northern Oklahoma Development Authority has adopted the Title VI Program to provide all its stakeholders the opportunity to be informed about the operations and opportunities to participate in the planning processes, and

NOW THEREFORE, BE IT RESOLVED that the Northern Oklahoma Development Authority does adopt and endorse the Title VI Program Plan, for all programs administered and or managed by NODA as the guide for informing the public and communicating the opportunities available to them pursuant with Title VI of the Civil Right Act.

PASSED, APPROVED AND ADOPTED by the NODA Board on the 22nd day of September 2022.

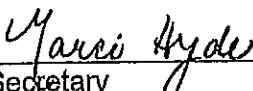


Chair, NODA Board



Executive Director, NODA

Attest:



Secretary

**RESOLUTION OF THE
NORTHERN OKLAHOMA DEVELOPMENT AUTHORITY
A LOCAL COUNCIL OF GOVERNMENTS
APPROVING
PUBLIC PARTICIPATION PLAN**

WHEREAS, the Northern Oklahoma Development Authority (NODA) was established to serve as the planning organization and to provide guidance to local governments. This includes the counties of Alfalfa, Blaine, Garfield, Grant, Kay, Kingfisher, Major, and Noble.


WHEREAS, the Northern Oklahoma Development Authority has adopted the Public Participation Plan outlining the means of encouraging, gathering, and incorporating the public's input;

NOW THEREFORE, BE IT RESOLVED that the Northern Oklahoma Development Authority does approve, adopt and endorse the Public Participation Plan as the guide for gathering and incorporating public input into the planning process for all programs administered and or managed by NODA.

PASSED, APPROVED AND ADOPTED by the NODA Board on the 22nd day of September 2022.



Chair, NODA Board



Executive Director, NODA

Attest:



Secretary

**RESOLUTION OF THE
NORTHERN OKLAHOMA DEVELOPMENT AUTHORITY
A LOCAL COUNCIL OF GOVERNMENTS
APPROVING
LIMITED ENGLISH PROFICIENCY PLAN**


WHEREAS, the Northern Oklahoma Development Authority (NODA) was established to serve as the planning organization and to provide guidance to local governments. This includes the counties of Alfalfa, Blaine, Garfield, Grant, Kay, Kingfisher, Major, and Noble.

WHEREAS, Executive Order 13166 signed on August 11, 2000 guides the Limited English Proficiency Plan, and


WHEREAS, Northern Oklahoma Development Authority has adopted the Limited English Proficiency Plan to provide all its stakeholders the opportunity to participate in the transportation planning process, regardless of their proficiency in speaking the English language, and

NOW THEREFORE, BE IT RESOLVED that the Northern Oklahoma Development Authority does adopt and endorse the Limited English Proficiency Plan, as the guide for reaching those not proficient in speaking the English language for all programs administered and or managed by NODA.

PASSED, APPROVED AND ADOPTED by the NODA Board on the 22nd day of September 2022.



Chair, NODA Board

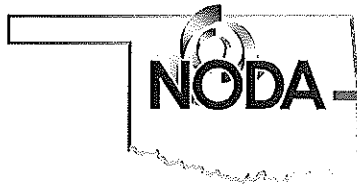


Executive Director, NODA

Attest:



Secretary



Attachment 4

TITLE VI COMPLAINT FORM

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

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

Northern Oklahoma Development Authority

2901 N. Van Buren

Enid, OK 73703

Phone: 580-237-4810

<http://www.noda-ok.org>

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

Race Color National Origin Other

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

| | |
|---------------------------|--|
| Name(s): | |
| Work Location (if known): | |
| Work Phone: | |
| Date of alleged incident: | |

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

| | |
|-----------------|--|
| Name: | |
| Address: | |
| Work Phone: | |
| E-mail Address: | |

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

What remedy are you requesting? Please be specific:

Have you filed or do you intend to file a charge or complaint concerning the matters raised in this complaint with any other agencies (Federal, State, or local):

Yes No

If so, please provide the following information:

| | |
|----------------------------------|--|
| Agency: | |
| Address: | |
| Name of Investigator (if known): | |
| Phone Number: | |
| E-mail Address: | |
| Date Filed: | |
| Status of case: | |

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

Print or typed name of complainant:

[Empty text box for name]

Signature

Date

Completed forms must be submitted to the Northern Oklahoma Development Authority.
If you require any assistance in filling out this form please contact the Title VI Coordinator at 580-237-4810.

Print Form

Attachment 5

| TITLE VI SELF-SURVEY | | |
|------------------------------------------------------------------------------------|-----------|----------|
| Name of Program: | | |
| Date Filed with ODOT/Transit Programs Division: | | |
| | | |
| Survey Date: | | |
| Period Covered: | | |
| A. Summary of complaints: | | |
| B. Number of complaints for the period: | | |
| C. Number of complaints voluntarily unresolved: | | |
| D. Number of complaints currently unresolved: | | |
| E. Attach a summary of any type of complaint and provide: | | |
| • Name of complainant: | | |
| • Race: | | |
| • Allegation: | | |
| • Findings: | | |
| • Corrective Action: | | |
| • Identify any policy/procedure changes made as a result of the complaint: | | |
| • Provide the date history: <i>(date complaint received through resolution)</i> | | |
| Distribution of Title VI Information | | |
| 1. Are new employees made aware of the Title VI responsibilities | YES _____ | NO _____ |

| | | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|----------|
| pertaining to their specific duties? | | |
| 2. Do new employees receive this information via employee orientation? | YES _____ | NO _____ |
| 3. Is Title VI information provided to all employees and program applicants? | YES _____ | NO _____ |
| 4. Is Title VI information prominently displayed in the organization and on relevant program materials? | YES _____ | NO _____ |
| 5. Identify any improvements you have implemented since the last self-survey to support Title VI communication to employees and program applicants: | | |
| 6. Identify any improvements you plan to implement before the next self-survey to support Title VI communication to employees and program applicants: | | |
| 7. Identify any problems encountered with Title VI compliance, and discuss possible remedies: | | |
| Signature: | | |
| Title: | | |
| Date: | | |