



SOUTHERN OREGON ASPIRE INC.

TITLE VI / NON-DISCRIMINATION PLAN



*Inspiring Unlimited Opportunities for People to Create the Life They Choose*

**Southern Oregon Aspire**

**Corporate Resolution**

The Southern Oregon Aspire, Inc. Board of Directors, at their October 11, 2021 regular meeting approved, by vote of the majority according to the bylaws, the Southern Oregon Aspire 2021 Title VI Plan.

It is hereby resolved that the Board of Directors has given Meghan Boehm, CFO, the authority to submit this plan.

The officers of this corporation are authorized to perform the acts to carry out this corporate resolution.

  
Janet Capetty, President

10/12/2021  
Date

  
Angell Webb, Secretary / Treasurer

10/12/2021  
Date

**Table of Contents**

Non-Discrimination Policy Statement..... 1  
Introduction and Federal Regulations..... 2  
Southern Oregon Aspire Area Demographic Profile. .... 4  
Southern Oregon Aspire Title VI/ Non-Discrimination Program ..... 8  
Attachment 1: Language Assistance Plan and Four Factor Analysis ..... 11  
Attachment 2: Southern Oregon Aspire Title VI/ Non-Discrimination Statement.....13  
Attachment 3: Discrimination Complaint Procedure..... 14  
Attachment 4: Southern Oregon Aspire Title VI Complaint Form .....16

**List of Tables**

Table 1: Percentage of Families and People Below the Poverty Level in Josephine County.....4  
Table 2: Race of Residents in Josephine County .....5  
Table 3: National Origin of Josephine County Residents.....6  
Table 4: Age of Residents in the United States Compared to Josephine County .....7  
Table 5: Disability Status within Josephine County .....7  
Table 6: Language Spoken at Home in Josephine County..... 11

## Non-Discrimination Policy Statement

In accordance with Title VI of the Civil Rights Act of 1964 and subsequent federal nondiscrimination directives such as the Federal-Aid Highway Act of 1973, the Rehabilitation Act of 1987, Americans with Disabilities Act of 1990 (ADA), Executive Order 12898 (Environmental Justice), and Executive Order 13166 (Limited English Proficiency), Southern Oregon Aspire assures that no person shall, on the grounds of race, color, national origin, limited English proficiency, sex, income, age or disability, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any of its programs or activities, whether or not they are federally funded.

Additionally, under Executive Order 12898 (Environmental Justice) and the subsequent USDOT, FHWA and FTA directives, Southern Oregon Aspire shall make every effort to identify and address, as appropriate, disproportionately high and adverse human health or environmental effects of Southern Oregon Aspire programs, policies and activities on Title VI protected populations.

Southern Oregon Aspire recognizes that the Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of "programs and activities" to include all programs or activities of Federal Aid recipients, sub-recipients and contractors/consultants, whether or not those programs are federally assisted.

In the event that Southern Oregon Aspire distributes federal aid funds to another governmental entity or subcontractor, Southern Oregon Aspire will include Title VI language in all written agreements and will monitor for compliance. The Southern Oregon Aspire Title VI Coordinator is responsible for initiating and monitoring Title VI activities, preparing required reports and other responsibilities as required by Title 23 Code of Federal Regulations (CFR) Part 200 and Title 49 CFR Part 21.

Signed:

  
\_\_\_\_\_  
Janet Capetty  
President, Board of Directors  
Southern Oregon Aspire, Inc.

10/12/2021  
Date

## Introduction and Federal Regulations

### Introduction

Southern Oregon Aspire's mission is "Inspiring Unlimited Opportunities for People to Create the Life They Choose". Our approach addresses housing, advocacy, community and job integration, education, work, and economic well-being.

Southern Oregon Aspire is a service provider for people with intellectual and developmental disabilities, operating in Josephine County through a contract with Oregon Department of Human Services. During the 2021 fiscal year, Southern Oregon Aspire served approximately 120 people with intellectual, and developmental disabilities. Our program provides 24-hour residential supports, and independent living supports, community job placements and job coaching, small group employment on our janitorial, landscape and WORX crews and community inclusion activities for individuals who choose not to work.

Most of Southern Oregon Aspire's supported individuals live in Grants Pass and surrounding areas, all within Josephine County. The 2020 U.S. Census found the population of Josephine County to be 88,090.

Southern Oregon Aspire works closely with Josephine County Transit and the local Special Transportation Advisory Committee/Public Transit Advisory Committee, who serve as the State approved governing body for transportation funding within Josephine County.

In accordance with Title VI of the Civil Rights Act of 1964, as amended, and related legislation as listed below, this Title VI / Non-discrimination Plan reflects Southern Oregon Aspire's commitment to ensuring no person shall - on the ground of race, color, national origin, religion, age, marital status, sexual orientation, or disability - be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity conducted by Southern Oregon Aspire.

### Title VI and Related Legislation

**Title VI of the Civil Rights Act of 1964, as amended, (42 USC 2000d to 2000-4) (23 CFR Part 200 and 49 CFR Part 21):** states 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 subjected to discrimination under any program or activity receiving Federal financial assistance."

The following contains a compilation of additional legal regulations, statutes or orders that, along with Title VI, create the legal requirements for non-discrimination within the Josephine County service area:

**The Civil Rights Restoration Act of 1987, (Pub. L. No. 100-259):** Broadens the scope of Title VI by expanding the definitions of terms "programs or activities" to include all programs or activities of Federal Aid recipients, sub-recipients, and contractors.

**Federal Aid Highway Act of 1973, (23 USC 324):** Stipulates that no person on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any

program or activity receiving federal assistance.

**Age Discrimination Act of 1975, (42 USC 6101):** Provides that no person in the United States shall, on the basis age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal assistance.

**Americans With Disabilities Act of 1990, (Pub. L. No. 101-336):** Provides that no qualified individual with a disability shall, by reason of such disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination by a department, agency, special purpose district, or other instrumentality of a state or a local government.

**Section 504 of the Rehabilitation Act of 1973:** Provides that no qualified handicapped person, shall, solely by reason of his/her handicap, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal assistance.

**Environmental Justice - Executive Order 12898:** Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, states that "each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations."

There are three fundamental environmental justice principles summarized from Executive Order 12898 and related USDOT and FHWA orders:

1. Avoid, minimize or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations.
2. Ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.
3. Prevent the denial, reduction, or significant delay in the receipt of benefits by minority and/or low-income populations.

**Limited English Proficiency - Executive Order 13166:** Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, further prohibits recipients of Federal financial assistance from discriminating based on national origin by failing to provide meaningful access to services to individuals who are Limited English Proficiency (LEP). This protection requires that LEP persons be provided an equal opportunity to benefit from or have access to services that are normally provided in English. According to FHWA, a limited English proficient person is an individual who does not speak English as their primary language and who has a limited ability to read, write, speak, or understand English.

**Additional Authorities and Citations: 20 CFR 50.3; 28 CFR Part 42; FTA Circular 4702.1**

## Southern Oregon Aspire Transportation Service Area Demographic Profile

Southern Oregon Aspire service area is all of Josephine County, including the cities of Williams, Grants Pass, Wilderville, Selma, Merlin, Kerby, Wolf Creek, Redwood, New Hope, Fruitdale, Cave Junction, O Brien, and Takilma. It is important to understand the demographic profile of this collective area in order to ensure that all persons have an equal opportunity to benefit from or have access to the activities of Southern Oregon Aspire and to avoid any disproportionate impacts from those activities. For this demographic profile, data from the 2019 American Community Survey and the 2020 Decennial Census for Josephine County was used to identify the general demographic characteristics of Southern Oregon Aspire service areas.

**Income and Poverty:** The 2019 American Community Survey data for Josephine County estimates that approximately 18% of individuals and 15% of families within Josephine County have an income below the poverty level. Additionally, 27% of people below the poverty level have a disability.

**Table 1: Percentage of Families and People Below the Poverty Level in Josephine County**

<b>Less than 100% of the Poverty Level</b>	<b>Percent</b>
<b>All people</b>	<b>18.1%</b>
<b>Age</b>	
Under 18 years	25.6%
Related children under 18 years	24.8%
18 to 64 years	19.5%
65 years and over	9.7%
<b>Living Arrangement</b>	
In Family Households	15.2%
Married couple families	8.8%
In Female householder, no spouse present households	38.2%
In other living arrangements	30.3%
<b>Disability Status</b>	
With any disability	27.3%
No disability	15.8%

2019 American Community Survey 5-Year Estimates, Table ID: S1703

**Race and Ethnicity:** According to the 2020 Decennial Census data for race (alone or in combination with one or more races) approximately 91% of residents of Josephine County are white, 1.3% are American Indian or Alaska Native and 1.1% are Asian. Residents of Hispanic or Latino descent (of any race) made up 8 % of the population. The U.S. Census considered race and ethnicity as separate and distinct identities, with Hispanic or Latino origin asked as a separate question.

**Table 2: Race of Residents in Josephine County**

<b>Race</b>	<b>Estimate</b>	<b>Percent</b>
<b>Total population</b>	<b>88,090</b>	
<b>One race</b>	<b>80,030</b>	<b>90.9%</b>
White	75,344	94.1%
Black or African American	415	0.5%
American Indian and Alaska Native	1,071	1.3%
Asian	886	1.1%

Native Hawaiian and Other Pacific	128	0.2%
Some other race	2194	2.7%
<b>Two races</b>	<b>7,471</b>	<b>8.5%</b>
White and Black or African American	485	0.6%
White and American Indian and Alaska Native	2,992	3.7%
White and Asian	733	0.9%
White and some other race	2,906	3.6%
<b>Hispanic or Latino Race</b>	<b>7,037</b>	<b>8.0%</b>

2020 Decennial Census Redistricting Data, Table P1

**National Origin:** The 2019 American Community Survey data shows that an estimated 95.7% of residents of Josephine County were born in the United States and 4.3% are foreign-born. According to the data, most foreign-born residents were born in Europe, followed by Latin America. Of those born in the United States, only 34% were born in the state of Oregon.

*Table 3: National Origin of Josephine County Residents*

Subject	Estimate	Percent
<b>Place of Birth</b>		
Total population	87,487	
Native	83,682	95.7%
State of residence	30,132	34.4%
Different state	53,147	60.7%
Born in Puerto Rico, U.S. Island areas, or born abroad to American parent(s)	403	0.5%
Foreign born	3,805	4.3%
Naturalized US Citizen	1974	51.9%
Europe	954	48.3%
Asia	174	8.8%
Africa	344	17.4%
Oceania	0	0.0%
Latin America	461	23.4%
Northern America	41	2.1%
Not a US Citizen	1831	48.1%
Europe	126	6.9%
Asia	209	11.4%
Africa	64	3.5%
Oceania	0	0.0%
Latin America	1279	69.9%
Northern America	153	8.4%



**Age:** The population in Josephine County is estimated to be 48% male and 52% female, according to the 2019 American Community Survey. The median age is 46.7, about 20% higher than the national median age of 35. The largest age cohort is 65-74 years old, which indicates a much older population than the nation as a whole.

**Table 4: Age of Residents in the United States Compared to Josephine County**

<b>Sex and Age</b>	<b>United States -</b>	<b>Josephine County -</b>
<b>Total population</b>	<b>328,239,523</b>	<b>87,487</b>
<b>Male</b>	<b>49.2%</b>	<b>48.4%</b>
<b>Female</b>	<b>50.8%</b>	<b>51.6%</b>
Under 5 years	5.9%	4.9%
5 to 9 years	6.0%	5.9%
10 to 14 years	6.5%	5.2%
15 to 19 years	6.5%	5.4%
20 to 24 years	6.5%	3.9%
25 to 34 years	13.9%	11.4%
35 to 44 years	12.8%	10.5%
45 to 54 years	12.4%	12.1%
55 to 59 years	6.5%	5.8%
60 to 64 years	6.4%	8.7%
65 to 74 years	9.6%	15.2%
75 to 84 years	4.9%	8.1%
85 years and over	1.9%	3.1%

2019 American Community Survey 1-Year Estimates

**Persons with Disabilities:** An estimated 24% of residents of Josephine County have a disability, of which 43% are aged 65 and over.

**Table 5: Disability Status within Josephine County**

<b>Disability Status</b>	<b>Estimate</b>	<b>Percent</b>
<b>Total Civilian Non-institutionalized Population</b>	<b>86,935</b>	
<b>Total with disability</b>	<b>20,657</b>	<b>23.8%</b>
Male	10,732	52.0%
Female	9,925	48.0%
<b>Age with disability</b>		
Under 18 years	2,294	11.1%
18 to 34 years	2,544	12.3%
35 to 64 years	6,961	33.7%
65 years and over	8,858	42.9%

2019 American Community Survey 1-Year Estimates

## **Southern Oregon Aspire**

### **Title VI / Non-Discrimination Program**

In accordance with Title VI of the Civil Rights Act of 1964, this Title VI / Non-Discrimination Plan reflects Southern Oregon Aspire's commitment to ensuring that no person shall, on the ground of race, color, national origin, religion, age, marital status, sexual orientation, or disability be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity provided by Southern Oregon Aspire. To ensure this, Southern Oregon Aspire has completed the following actions:

**1. Adopt a policy statement**

A signed policy statement assuring compliance with the Title VI of the Civil Rights Act of 1964. (Aspire's Equal Employment Opportunity policy #HR 005.2)

**2. Designate a Title VI Coordinator**

The current Southern Oregon Aspire Title VI Coordinator is responsible for initiating and monitoring Title VI activities, preparing reports and completing other responsibilities as required.

Southern Oregon Aspire Coordinator: Russ Bohnert  
rbohnert@soaspire.org  
(541) 476-8241

**3. Develop and implement a Public Participation Plan**

Southern Oregon Aspire encourages the inclusion of minorities and those of Limited English Proficiency in transportation planning, programming and decision-making processes as appropriate. Southern Oregon Aspire has reached out to all communities in the area to encourage participation, ensure participation of Title VI protected groups, address physical accessibility, language issues and other accommodations for Title VI protected groups.

**4. Demonstrate consideration of Limited English Proficiency**

As a recipient of federal funds, Southern Oregon Aspire must take reasonable steps to ensure meaningful access to its planning processes and the information and services it provides. To ensure that those of Limited English Proficiency can access and participate in planning, programming and decision-making processes, Southern Oregon Aspire has completed a Language Assistance Plan as shown in Attachment 1.

This plan includes a Four-factor analysis identifying the following reasonable steps to ensure access:

- As necessary; utilize professional translation and interpretation services.
- When issues or actions may affect areas or neighborhoods with significant LEP populations, place notices and announcements in appropriate community media, in applicable language(s).
- Include Title VI / Nondiscrimination Statements (Attachment 4) on the Southern Oregon Aspire website.

**5. Demonstrate consideration of Environmental Justice**

Southern Oregon Aspire ensures that all activities and funded projects avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority and low-income populations.

**6. Gather and maintain statistical data**

Southern Oregon Aspire gathers and maintains statistical data on race, color, national origin and sex of participants in, and beneficiaries of federally funded programs. Data will also be collected to identify populations in the service area who may speak languages other than English at home and those who speak English less than well or not at all and would be classified as Limited English Proficient or “LEP”. This data can be used to help identify any potential impacts and benefits of proposed projects on minority and low-income neighborhoods and to inform the development and implementation of the PPP the four-factor analysis for LEP outreach activities and other outreach strategies.

Data is gathered from the decennial U.S. Census and American Community Survey. Data may also be gathered from school districts, religious and/or community organizations and other state and local government agencies.

**7. Provide Title VI notice to the public**

A Title VI/Nondiscrimination Statement, an example of which is shown as Attachment 2, is posted on the Southern Oregon Aspire website.

**8. Establish a public complaint process**

Southern Oregon Aspire instituted and published a public complaint and investigation process as outlined in Attachment 4. Members of the public may file a signed, written complaint up to one hundred eighty (180) days from the date of alleged discrimination. Complaints may be filed through any of the methods listed below. A sample Title VI Complaint Form is shown as Attachment 4.

Complaints may be submitted:

- By Mail: Southern Oregon Aspire Title VI Coordinator  
Southern Oregon Aspire  
1465-B NE 7<sup>th</sup> Street  
Grants Pass, Oregon 97526
- By Email: [rbohnert@soaspire.org](mailto:rbohnert@soaspire.org)
- By Phone: 541-476-8241
- By Facsimile: 541-476-8266

**9. Maintain a record of Title VI complaints**

The Title VI Coordinator maintains a log of all complaints, investigations or lawsuits at Southern Oregon Aspire’s administrative offices: 1465-B NE 7<sup>th</sup> Street, Grants Pass, Oregon 97526. Records and investigative working files are retained for a minimum of four years internally.

**10. Complete employee trainings**

Southern Oregon Aspire staff attends applicable USDOT or Oregon Department of Transportation (ODOT) Title VI trainings when available.

## 11. Reporting and Compliance

Southern Oregon Aspire completes the following required Title VI reports:

- a. An *Annual Title VI Work Plan* will be included in the annual Unified Planning Work Program. This work plan will outline Title VI monitoring and review activities planned for the coming year and will provide a target completion date for each activity.
- b. An *Annual Accomplishment Report* describing major Title VI activities. This report includes Title VI compliance activities occurring during the preceding State of Oregon fiscal year and will be submitted to ODOT Region Planning staff. The report provides an overall review of the efficacy of Southern Oregon Aspire Title VI / Non-discrimination procedures, with specific information describing:
  - Summary of any approved changes to the Title VI Plan during the reporting period. If changes occurred, a signed copy of the revised document shall be included.
  - A description of the Title VI reporting structure, including the Title VI Coordinator, program manager and any support staff. This may include a listing of race, ethnicity, and gender for each staff person.
  - List any Title VI complaints received during the reporting period, including the basis for the complaint (ethnicity, gender, etc.) and summarize the outcome or resolution.
  - A summary of Southern Oregon Aspire planning and programming activities and a listing of Title VI activities occurring during those activities.
  - A summary of any consulting contracts and Title VI activities that occurring during the RFP process and implementation of the contract. This includes efforts made to utilize DBE consultants.
  - A listing of Title VI / Non-discrimination trainings which Southern Oregon Aspire staff participated in.
- c. *Annual Title VI Certifications and Assurances*, for submission with the annual Unified Planning Work Program.

## Attachment 1: Language Assistance Plan and Four Factor Analysis

As a recipient of federal funds, Southern Oregon Aspire must take reasonable steps to ensure that those of Limited English Proficiency have meaningful access to the information and services that Southern Oregon Aspire provides. As stated in Federal Register, Volume 70; Number 239, there are four factors to consider when determining “reasonable steps.” This is known as “the four-factor analysis” and is outlined below:

- Factor 1:** The number of proportion of LEP persons eligible to be served or likely to encounter a Southern Oregon Aspire program, activity or service.
- Factor 2:** The frequency with which LEP individuals come in contact with Southern Oregon Aspire programs, activities or service.
- Factor 3:** The nature and importance of the program, activity, or service provided by Southern Oregon Aspire to LEP community.
- Factor 4:** The resources available to Southern Oregon Aspire and overall costs.

It should be noted that for planning purposes, people that speak English “less than very well” are considered “LEP” and are included in the analysis. Further, the service area for this purpose is defined as Josephine County.

### **Factor 1: The number of proportion of LEP persons eligible to be served or likely to encounter a Southern Oregon Aspire program, activity or service.**

The first step is to collect demographic data on the number of LEP persons in the Southern Oregon Aspire service area who are eligible to be served, likely to be served, or likely to be encountered by Southern Oregon Aspire through participation in the transportation planning process. Table 6 is derived from the U.S. Census Bureau’s 2019 American Community Survey 5-year estimates. It shows the number and percent of LEP persons 5 years and over, in total and by ability to speak English or other languages in Josephine County. The table shows that an estimated 1.5% of the population (aged 5 and over) in Josephine County “speak English less than very well”, and that the majority of those individuals are Spanish speaking.

The Department of Justice has established a safe harbor stating that grantees provide language services for vital documents where populations speaking those languages are 5% or 1,000, whichever is less. A vital document is a document that if it was not translated would deny LEP individual(s) access to a service, for example, a Title VI complaint form.

**Table 6: Language Spoken at Home in Josephine County**

<b>Language Spoken at Home</b>	<b>Estimate</b>	<b>Percent</b>
Population 5 years and over	82,005	
English only	77,170	94.1%
Language other than English	3,228	3.9%
Spanish	2,301	2.8%
<b><i>Speak English less than "very well"</i></b>	<b>948</b>	<b>1.2%</b>
Speak other languages	927	1.1%
<b><i>Speak English less than "very well"</i></b>	<b>251</b>	<b>0.3%</b>

2019 American Community Survey 5-Year Estimates

**Factor 2: The frequency with which LEP individuals come in contact with Southern Oregon Aspire programs, activity, or service.**

The four-factor analysis identified Spanish as the most significant language spoken by the LEP population in Josephine County. The LEP population will likely continue to increase and, as a result, the probability of increased future contact with Southern Oregon Aspire. To date, Southern Oregon Aspire has not received any formal requests by LEP individuals for language translation of any document or any requests for an interpreter at any public activity.

**Factor 3: The nature and importance of the program, activity, or service provided by the Southern Oregon Aspire to LEP community**

Southern Oregon Aspire activities directly affect immediate access to vital, immediate or emergency assistance, such as medical treatment or services for basic needs. The impacts of transportation investments resulting from Southern Oregon Aspire planning activities affect all residents in the Southern Oregon Aspire service area. Southern Oregon Aspire considers the potential impacts of proposed transportation investments on underserved and underrepresented populations.

Southern Oregon Aspire must ensure that all segments of the population, including LEP persons, have been involved or have had the opportunity to be involved in evaluation and planning processes leading to transportation investments. To encourage involvement, Southern Oregon Aspire has reached out to stakeholder groups, maintains a public website and conducts other activities to build public understanding of Southern Oregon Aspire and its activities. Southern Oregon Aspire is concerned with input from all stakeholders, and every effort is taken to make the transportation planning process as inclusive as possible. Involvement by any citizen in Southern Oregon Aspire activities is voluntary and Southern Oregon Aspire does not conduct activities requiring interested parties to complete applications, interviews or other activities prior to participation.

**Factor 4: The resources available and overall costs.**

Given the size of the LEP population in the service area and current financial constraints, full multi-language translations of large transportation planning documents and maps is not warranted at this time. Southern Oregon Aspire will complete the actions listed below as part of its LEP outreach strategy. Should an individual enter one or more of Southern Oregon Aspire's programs that is part of the LEP population, appropriate steps would be taken to provide the necessary language assistance to the individual.

**Plan for Assisting Persons of Limited English Proficiency**

Southern Oregon Aspire will complete the following ongoing actions as part of its LEP outreach strategy:

- As necessary, Southern Oregon Aspire will utilize professional translation and interpretation services.
- When issues or actions affect concentrated populations of non-English speaking people, Southern Oregon Aspire will place notices and announcements in appropriate community media, in applicable language(s).
- Include Title VI Nondiscrimination Statements (Appendix G) on the Southern Oregon Aspire website as well as in the promotional materials.

## **Attachment 2: Southern Oregon Aspire Title VI / Non-Discrimination Statement**

### **SOUTHERN OREGON ASPIRE TITLE VI NOTICE TO PUBLIC SOUTHERN OREGON ASPIRE TÍTULO VI COMUNICACIÓN PÚBLICA**

Title VI of the Civil Rights Act of 1964 states:

*“No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”*

Southern Oregon Aspire is committed to complying with the requirements of Title VI in all of its programs and activities. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Southern Oregon Aspire. A complainant may also file a complaint directly with the Federal Transit Administration by addressing the complaint to the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor - TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

For more information about Southern Oregon Aspire’s Title VI/Non-Discrimination Program, including procedures for filing a complaint, contact the Southern Oregon Aspire Title VI Coordinator at 541-476-3048; by e-mail to [rbohnert@soaspire.org](mailto:rbohnert@soaspire.org); or by visiting Southern Oregon Aspire’s administrative offices at: 1465-B NE 7<sup>th</sup> Street, Grants Pass, Oregon 97526.

If information is needed in another language, contact 547-476-8241

**Si se necesita información en otro idioma de contacto 541-476-8241**

## **Attachment 3: Discrimination Complaint Procedure**

### **Introduction**

The complaint procedures outlined herein apply to Southern Oregon Aspire and other primary recipients and sub-recipients of Federal financial assistance. These procedures cover discrimination complaints filed under Title VI of the Civil Rights Act of 1964, Civil Rights Restoration Act of 1987, Section 504 of the Rehabilitation Act of 1973, and other non-discrimination authorities relating to any program, services, or activities administered by Southern Oregon Aspire and its sub-recipients, consultants, and contractors.

Southern Oregon Aspire will make every effort to obtain early resolution of complaints at the lowest level possible. Complaints of alleged discrimination will be investigated by the appropriate authority. The option of informal mediation meeting(s) between the affected parties and Southern Oregon Aspire Title VI Coordinator may be utilized for resolution. Upon completion of each investigation, Southern Oregon Aspire's Title VI Coordinator will inform every complainant of all avenues of appeal.

The purpose of these discrimination complaint procedures is to describe the process used by Southern Oregon Aspire for processing complaints under Title VI of the Civil Rights Act of 1964, related statutes and authorities.

### **Complaint Procedure**

1. Any person who believes he or she, individually, as a member of any specific class, or in connection with any disadvantaged business enterprise, has been subjected to discrimination prohibited by Title VI of the Civil Rights Act of 1964, the American with Disabilities Act of 1990, Section 504 of the Vocational Rehabilitation Act of 1973, or the Civil Rights Restoration Act of 1987, as amended, may file a complaint with Southern Oregon Aspire. A complaint may also be filed by a representative on behalf of such a person. All complaints will be referred to the Southern Oregon Aspire Title VI Coordinator for review and action.
2. In order to have the complaint considered under this procedure, the complainant must file the complaint no later than 180 days after:
  - a) The date of alleged act of discrimination; or
  - b) Where there has been a continuing course of conduct, the date on which that conduct was discontinued.

In either case, Southern Oregon Aspire may extend the time for filing or waive the time limit in the interest of justice, as long as Southern Oregon Aspire specifies in writing the reason for so doing.

3. Complaints shall be in writing and shall be signed by the complainant and/or the complainant's representative. Complaints shall set forth as fully as possible the facts and circumstances surrounding the alleged discrimination. In the event a person makes a verbal complaint of discrimination to a Southern Oregon Aspire representative or staff, that person shall be interviewed by the Southern Oregon Aspire Title VI Coordinator. If necessary, the Southern Oregon Aspire Title VI Coordinator will assist the person in transcribing the complaint to written form and submitting the written version of the complaint to the person for signature. The complaint shall then be handled according to Southern Oregon Aspire investigative procedures.
4. Complaints may be submitted to Southern Oregon Aspire Title VI Coordinator through the following methods:

By Email:        [rbohnert@soaspire.org](mailto:rbohnert@soaspire.org)

By Mail:         Southern Oregon Aspire Title VI Coordinator



1465-B NE 7<sup>th</sup> Street  
Grants Pass, Oregon 97526  
By Phone: 541-476-8241  
By Facsimile: 541-476-8266

5. Within 10 days, the Southern Oregon Aspire Title VI Coordinator will acknowledge receipt of the allegation, inform the complainant of action taken or proposed action to process the allegation, and advise the complainant of other avenues of redress available, such as the Oregon Department of Transportation (ODOT) and U.S. Department of Transportation (USDOT).
6. The Southern Oregon Aspire Title VI Coordinator will advise ODOT and/or USDOT within 10 days of receipt of the allegations. Generally, the following information will be included in every notification to ODOT and/or USDOT:
  - a) Name, address, and phone number of the complainant.
  - b) Name(s) and address(es) of alleged discriminating official(s).
  - c) Basis of complaint (i.e., race, color, national origin, or sex)
  - d) Date of alleged discriminatory act(s).
  - e) Date complaint received by the recipient.
  - f) A statement of the complaint.
  - g) Other agencies (local, state, or Federal) where the complaint has been filed.
  - h) An explanation of the actions Southern Oregon Aspire has taken or proposed to resolve the issue in the complaint.
6. Within 60 days, the Southern Oregon Aspire Title VI Coordinator will conduct an investigation of the allegation and based on the information obtained, will render a recommendation for action in a report of findings to the CED Manager. The complaint should be resolved by informal means whenever possible. Such informal attempts and their results will be summarized in the report of findings.
7. Within 90 days of receipt of the complaint, the Southern Oregon Aspire Title VI Coordinator will notify the complainant in writing of the final decision reached, including the proposed disposition of the matter. The notification will advise the complainant of his/her appeal rights with ODOT, or USDOT, if they are dissatisfied with the final decision rendered by Southern Oregon Aspire. The Southern Oregon Aspire Title VI Coordinator will also provide ODOT and/or USDOT with a copy of this decision and summary of findings upon completion of the investigation.
8. Contact information for the state and federal Title VI administrative jurisdiction is as follows:

Oregon Department of Transportation  
Mail: Office of Civil Rights  
Oregon Department of Transportation  
Attn. Title VI Officer  
955 Center St. NE, Suite 471  
Salem, Oregon 97301  
Phone: 503-986-4350  
Facsimile: 503-986-6382

Federal Transit Administration Office of Civil Rights  
Mail: Attention: Title VI Program Coordinator  
East Building, 5th Floor – TCR  
1200 New Jersey Avenue, SE Washington, DC 20590

## Attachment 4: Southern Oregon Aspire Title VI Complaint Form

Southern Oregon Aspire, as a recipient of federal financial assistance, is required to ensure that all of its activities and any benefits from these activities are conducted in a manner consistent with Title VI of the Civil Rights Act of 1964, as amended. Any person who believes that he or she has been subjected to discrimination under any of Southern Oregon Aspire's programs or activities based on their race, color, national origin, limited English proficiency, sex, income, age or disability may file a written complaint with Southern Oregon Aspire.

### Complainant

Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_  
Telephone Number: \_\_\_\_\_

### Person discriminated against (if other than the complainant)

Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_  
Telephone Number: \_\_\_\_\_

Were you discriminated against because of your:

- |                                     |  |
|-------------------------------------|--|
| <input type="checkbox"/> Race       | <input type="checkbox"/> National Origin |
| <input type="checkbox"/> Color      | <input type="checkbox"/> Age             |
| <input type="checkbox"/> Gender     | <input type="checkbox"/> Income Status   |
| <input type="checkbox"/> Disability | <input type="checkbox"/> Other _____     |

Date and Time of Alleged Incident: \_\_\_\_\_

Explain as clearly as possible what happened and how you believe you were discriminated against. Indicate who was involved and any Southern Oregon Aspire projects, plans or programs that may have led to the situation you are describing. Be sure to include the names and contact information of any witnesses. If more space is needed, please use additional pages.

---

---

---

---

---

---

---

---

---

---

Have you filed this complaint with any other federal, state or local agency or with any court?

Yes       No

If yes, check and identify all that apply:

- Federal Agency \_\_\_\_\_
- Federal Court \_\_\_\_\_
- State Agency \_\_\_\_\_
- State Court \_\_\_\_\_
- Local Agency \_\_\_\_\_

Please provide information for a contact person at the Agency or Court where the complaint was filed.

Name: \_\_\_\_\_ Address: \_\_\_\_\_  
 City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_  
 Telephone Number: \_\_\_\_\_

Please sign below. You may attach any additional written materials or other information you believe is relevant to your complaint.

Signature \_\_\_\_\_ Date \_\_\_\_\_

**Please submit this signed form to and any attachments to:**

Southern Oregon Aspire  
 Title VI Coordinator  
 1465-B NE 7<sup>th</sup> Street  
 Grants Pass, Oregon 97526

NOTICE TO COMPLAINANT: Southern Oregon Aspire is required to forward information about this complaint to ODOT and/or USODOT including the following: (1) Complainant’s name, address, phone number; (2) Name(s) and addresses of alleged discriminating officials (c) Basis of Complaint; (4) Date of alleged discriminatory acts; (5) Date complaint received by recipient (6) Statement of the complaint; (7) Other agencies where the complaint has been filed; (8) An explanation of the actions Southern Oregon Aspire has taken or proposed to resolve the issue in the complaint.