



**CITY OF SISTERS**  
**Title VI Plan**

**Adopted August 13, 2015**

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## INTRODUCTION

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color and national origin in programs and activities receiving Federal financial assistance.

The City of Sisters is committed to ensuring that no person is excluded from participation in, or denied the benefits of its programs and services on the basis of race, color, sex, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.A

### TITLE VI COMPLAINT PROCEDURES

In order to comply with 49 CFR Section 21.9(b), the City of Sisters 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 Manager at any time within one hundred and eighty (180) days from the date of the alleged discriminatory act.

If you believe you have been subjected to discrimination under Title VI, you may file a complaint.

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

You may file a signed, written complaint up to one hundred and eighty (180) days 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.sisters.or.us/city-departments/city-manager.html#forms>, which may be completed for this purpose.

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

City of Sisters  
City Recorder  
520 E. Cascade Ave.

PO Box 39

Sisters, OR 97759

By phone: 541-549-6022

By fax: 541-549-0561

*NOTE: The City of Sisters 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 facsimile, 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 Sisters?

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 Manager, or designee, will investigate the complaint and make a determination. 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. Customer will be notified of resolution.

The City of Sisters 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 Manager, 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.

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.

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 Sisters prepares and maintains a list of any active investigations conducted by entities other than the FTA, lawsuits, or complaints naming the City of Sisters 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, 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.

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

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

**COUNCIL COMPOSITION**

The City of Sisters is overseen by an elected City Council. The table below depicts Council membership as of July 2015.

	Caucasian	Hispanic or Latino (of any race)	Black or African American	Asian	Native Hawaiian	American Indian or Alaskan Native	Two or more races	Other
Deschutes County (2010 Census)	139,470	11,718	524	1,412	183	1,197	3,088	141
Sisters City Council	5	0	0	0	0	0	0	0

## LIMITED ENGLISH PROFICIENCY (LEP) PLAN

The City of Sisters 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 particular type of 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.

## ANALYSIS OF FACTORS

**Factor No. 1:** The number or proportion of LEP persons in the service area.

The City of Sisters is largely English speaking. The vast majority of the population with which we interact is proficient in English. According to the 2013 American Community Survey, 85% of Oregon's population age five and up speaks English only, while 9% have Spanish as the language spoken at home.

**Factor No. 2:** The frequency with which LEP individuals come into contact with the service.

Contacts with the City of Sisters are made at City Hall and through our website, [www.ci.sisters.or.us](http://www.ci.sisters.or.us). We have an average of .25 customer contacts a month that require translation. The City's Public Works Operations Coordinator is fluent in Spanish and we use her abilities to communicate with Spanish speaking customers. The City also partners with the Sisters School District to provide translation services as necessary.

**Factor No. 3:** The nature and importance of service provided by the City of Sisters.

The City of Sisters 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.

**Factor No. 4.** The resources available to the recipient of the federal funds to assure meaningful access to the service by LEP persons.

The City's current in-house language capabilities are English and Spanish. The City has not encountered a need to have language services in other languages besides Spanish.

**IMPLEMENTATION PLAN**

The City of Sisters will review 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.

The City of Sisters identifies LEP persons in the service area through telephone and personal contact. The City provides translation services and partners with Sisters School District when necessary. Bus schedules for Cascades East Transit are available at City Hall and contain Title VI language.

City employees will ensure that there are no barriers to service or accommodation that would prevent usage or access to city services. Employees will notify the City Manager in writing of the circumstances surrounding any reported allegations of discrimination no later than the next business day.

**NOTIFYING BENEFICIARIES OF THEIR RIGHTS UNDER TITLE VI**

Our website includes our 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 520 E. Cascade Ave., Sisters, OR). Individuals who believe they have been discriminated against may request a complaint form from the City Recorder.

**ANALYSIS OF CONSTRUCTION PROJECTS**

Over the last three years the City of Sisters has not completed a construction project requiring an environmental assessment (EA) or environmental impact statement (EIS).

## **INCLUSIVE PUBLIC PARTICIPATION**

Community Outreach is a requirement of Title VI. 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 of Sisters engages the public in its planning and decision-making processes. The City also follows public notification regulations as required by any federal funds received.



## 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				
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.				

<b>Section IV:</b>			
Have you previously filed a Title VI complaint with this agency?	Yes		No
<b>Section V:</b>			
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?	Yes		No
If yes, check all that apply: <input type="checkbox"/> Federal Agency: _____ <input type="checkbox"/> Federal Court: _____ <input type="checkbox"/> State Agency: _____ <input type="checkbox"/> State Court: _____ <input type="checkbox"/> Local Agency: _____			
Please provide information about a contact person at the agency/court where the complaint was filed.			
Name:		Agency:	
Title:		Telephone:	
Address:			
<b>Section VI:</b>			
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 Sisters  
City Recorder  
520 E. Cascade Ave.  
PO Box 39  
Sisters, OR 97759

## NOTIFICATION OF COMPLIANCE WITH TITLE VI

In order to comply with 49 CFR Section 21.9 (d) the City of Sisters 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 Sisters website. The City of Sisters 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 Sisters 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 Sisters.

Information on the City of Sisters' civil rights program, and the obligations and procedures to file a complaint, can be found on the City of Sisters website at <http://www.ci.sisters.or.us>. This information is also available upon request, please inquire at City Hall or contact the City Recorder at (541) 549-6022.

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.

If information is needed in another language contact the City Recorder at 541-549-6022.  
Si se necesita información en otro contacto de lenguas de la grabadora Ciudad al 541-549-6022.