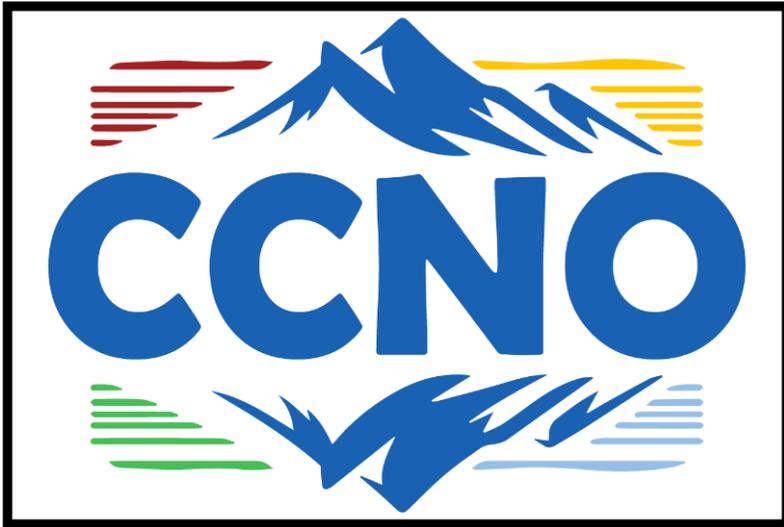


# **Community Connection of Northeast Oregon, Inc.**



**Baker, Union, Wallowa County  
Public Transportation**

## **Civil Rights Program**

**Title VI, Language Access Plan  
(LAP Plan)**

---

January 2026

# Table of Contents

<u>Introduction.....</u>	<u>2</u>
<u>Signed Policy Statement.....</u>	<u>2</u>
<u>Notification of CCNO’s Title VI Obligations.....</u>	<u>2</u>
<u>Accessibility / ADA Compliance Statement .....</u>	<u>2</u>
<u>Title VI Notice to the Public – English.....</u>	<u>3</u>
<u>Title VI Notice to the Public – Spanish .....</u>	<u>4</u>
<u>Title VI Complaint Procedure .....</u>	<u>5</u>
<u>Title VI Complaint Form (English &amp; Spanish) .....</u>	<u>6</u>
<u>Transit-related Title VI Investigations, Complaints and Lawsuits.....</u>	<u>6</u>
<u>Public Participation Plan .....</u>	<u>6</u>
Access to Information.....	6
Public Outreach and Engagement Activities.....	7
Ongoing and Future Outreach to Minority, Low-Income and LEP Populations .....	7
<u>Summary of Public Participation Efforts .....</u>	<u>8</u>
<u>Title VI Equity Analysis .....</u>	<u>9</u>
<u>List of Transit-Related Title VI Investigations, Complaints, and Lawsuits .....</u>	<u>9</u>
<u>Deviated Fixed Route Service Standards and Policies.....</u>	<u>9</u>
<u>Language Assistance Plan.....</u>	<u>14</u>
<u>LEP Monitoring and Updates to This Plan .....</u>	<u>14</u>
<u>Limited English Proficiency Plan (LEP) .....</u>	<u>15</u>
<u>Four-Factor Limited English Proficiency (LEP) Analysis Summary.....</u>	<u>15</u>
<u>Board Composition and Minority Representation on Non-Elected Bodies .....</u>	<u>18</u>
<u>Appendix A: Signed Policy Statement.....</u>	<u>20</u>
<u>Appendix B: Title VI Complaint Form (English) .....</u>	<u>21</u>
<u>Appendix C: Title VI Complaint Form (Spanish).....</u>	<u>24</u>
<u>Appendix D- Population Census Data.....</u>	<u>27</u>
<u>Appendix E: Census Data for Language Spoken at Home .....</u>	<u>28</u>

## Introduction

This program reflects Community Connection of Northeast Oregon public transportation (CCNO), to include Baker, Union, and Wallowa Counties commitment to ensuring that no person 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 provided by Community Connection Northeast Oregon public transportation.

---

## Signed Policy Statement

A policy statement signed by the Chairman of the Board of Community Connection to ensure public transportation's compliance with Title VI of the Civil Rights Act of 1964 can be found as Appendix A.

---

## Notification of CCNO's Title VI Obligations

CCNO publicizes its Title VI program by posting the following notices in English and Spanish on the CCNO website, customer brochures, vehicles, and at CCNO Transit Buildings.

---

## Accessibility / ADA Compliance Statement

Community Connection of Northeast Oregon (CCNO) is committed to ensuring that all individuals, including persons with disabilities, have equal access to information about its programs and services. CCNO's Title VI Program and related documents are available in alternative formats—such as large print, audio recording, Braille, or accessible electronic formats—upon request. Individuals needing an accommodation or additional assistance may contact CCNO Public Transportation at (541) 963-2877 or by email at [ada.titlevi@ccno.org](mailto:ada.titlevi@ccno.org)

## Title VI Notice to the Public – English



### Community Connection Public Transportation- Title VI Notice

Community Connection of Northeast Oregon, Inc. operates services in accordance with Title VI of the Civil Rights Act. Its programs are offered without regard to race, color or national origin. Any person who believes he or she has been aggrieved by any unlawful discriminatory practice may file a complaint with Community Connection Public Transportation.

For more information on Community Connection of Northeast Oregon public transportation civil rights program, and the obligations and procedures to file a complaint please:

- Contact us at (541) 963-2877 or
- Visit <https://ccno.org/wp-content/uploads/2025/10/Title-VI-and-Tile-II-ADA-Complaint-Form-7-15-25.pdf> or
- Visit our direct service offices at:
  - 2802 Adams Ave. La Grande, Oregon 97850
  - 2204 E. Penn, La Grande, Oregon, 97850
  - 2810 Cedar Street Baker City, Oregon 97814
  - 702 NW First Street, Enterprise Oregon, 97828

A complaint may also be filed directly with the Federal Transit Administration – Office of Civil Rights, Attn: Title VI Program Coordinator. East Building 5th Floor-TCR, 1200 New Jersey Avenue, SE Washington DC, 20590.

## Title VI Notice to the Public – Spanish



### Community Connection of Northeast Oregon- Title VI Notice

Community Connection Transporte Público – El condado de Union y su agencia matriz, Community Connection of Northeast Oregon, Inc., operan servicios conforme al Título VI de la Ley de Derechos Civiles. Sus programas se ofrecen sin importar raza, color u origen nacional. Cualquier persona que crea que ha sido perjudicada por cualquier práctica discriminatoria ilegal puede presentar una queja ante Community Connection Public Transportation.

Para más información sobre el programa de derechos civiles del Transporte Público del Noreste de Oregón, así como sobre las obligaciones y procedimientos para presentar una queja, por favor:

- Contáctenos en el (541) 963-8277, o
- Visite <https://ccno.org/wp-content/uploads/2025/10/Title-VI-and-Title-II-ADA-Complaint-Form-7-15-25.pdf>, o
- Visita nuestras oficinas de servicio directo en:
  - 2802 Adams Ave. La Grande, Oregon 97850
  - 2204 E. Penn, La Grande, Oregon, 97850
  - 2810 Ceder Street Baker City, Oregon 97814
  - 702 NW First Street, Enterprise Oregon, 97828

Un demandante también puede presentar una queja directamente ante la Administración Federal de Tránsito – Oficina de Derechos Civiles, Atención: Coordinador del Programa del Título VI. Edificio Este 5ª planta-TCR, 1200 New Jersey Avenue, SE Washington DC, 20590.

## Title VI Complaint Procedure

The CCNO Complaint Form and Complaint Procedure are available CCNO website and at CCNO Transit Buildings

Any person who believes he or she has been discriminated against based on race, color, or national origin by CCNO Public Transportation may file a Title VI complaint by completing and submitting the agency's Title VI complaint form which can be accessed as indicated in the notice above. Our process for addressing a civil rights complaint is as follows:

- Once the complaint is received, CCNO will review it to determine the jurisdiction of the complaint. The complaint will be logged, and the complainant will receive an acknowledgement letter, email, or fax (in a fashion appropriate to the manner in which the complaint was received) within 14 days informing her/him whether the complaint will be investigated by our office.
- Any complaint Community Connection of Northeast Oregon receives that deals with federal civil rights issues will be reviewed by the Manager and forwarded to the CCNO Administrative staff and Executive Director of Community Connection of Northeast Oregon, Inc (CCNO).
- Once the complaint is logged, CCNO has 60 days to resolve the issue: not including the appeals process.
- Within seven calendar days from the log date, the CCNO Manager or CCNO Administrative staff will investigate the full complaint including but not limited to: clarifying questions with the complainant, interviewing staff alleged to be involved, inquiring with witnesses to alleged event(s), consulting with local and state civil rights experts, and following up with the complainant.
- Within ten calendar days from the log date, the Manager or CCNO Administrative staff will provide the respondent(s) and CCNO Executive Director with a written account of the investigation(s) and finding(s). The respondent(s) will have ten calendar days from the date of notification to accept the account of events or furnish his or her written response to the allegation(s).
- Within 30 days from the log date, the Manager will take all corrective actions deemed to be necessary and appropriate.
- Within 60 days from the log date, CCNO's final investigative report and a copy of the complaint will be forwarded to the complainant(s), respondent(s), CCNO Executive Director, ODOT Public Transit, and the Federal Transit Administration's Office of Civil Rights.

If the complainant wishes to appeal the decision, he/she may appeal to the Federal Transit Administration's Office of Civil Rights.

## Title VI Complaint Form (English & Spanish)

Refer to *Appendix B and C*

---

### Transit-related Title VI Investigations, Complaints and Lawsuits

Community Connection of Northeast Oregon Public Transportation maintains an active log of all civil rights complaints. A copy of the current log is available upon request by submitting a public records request via a letter or email to the administration office, 2802 Adams Ave, La Grande Oregon, 97850 or <mailto:ada.titlevi@ccno.org>.

---

### Public Participation Plan

Community Connection of Northeast Oregon (CCNO) complies with all grant-related public involvement requirements as defined in applicable grant agreements and the Federal Transit Administration (FTA) Title VI Circular 4702.1B. CCNO's public participation process provides meaningful opportunities for involvement by all persons, including minority populations, low-income populations, and persons with Limited English Proficiency (LEP).

The following summarizes CCNO's public participation and outreach efforts conducted in recent years.

#### Access to Information

CCNO provides information about its transit services through multiple communication methods to ensure meaningful access to Title VI-protected populations. General service information is available on the CCNO website in both English and Spanish. Translation into additional languages is available upon request, consistent with CCNO's Limited English Proficiency (LEP) Plan.

Printed materials and digital content are developed to be clear, concise, and accessible. CCNO takes reasonable steps to ensure that vital information is available to LEP individuals.

## Public Outreach and Engagement Activities

---

In accordance with FTA Circular 4702.1B, CCNO conducts outreach efforts that encourage participation by minority, low-income, and LEP populations. Over the past several years, CCNO has participated in community-based activities such as parades, resource fairs, holiday events, county fairs, and other local festivals.

CCNO also partnered with Northeast Oregon Network (NEON) to host a targeted resource fair designed to engage Pacific Islander and Latino communities. This outreach effort was intended to provide meaningful access to information about CCNO services and participation opportunities. Informational materials were provided in Marshallese and Spanish, and bilingual staff were present to assist attendees and respond to questions.

Outreach activities are supported through coordination with local Transportation Advisory Council (TAC) members, community partners, and social media platforms to broaden public awareness.

## Ongoing and Future Outreach to Minority, Low-Income and LEP Populations

---

CCNO monitors minority, low-income, and LEP populations in Baker, Union, and Wallowa Counties using available census and demographic data, consistent with Title VI requirements. CCNO evaluates this data to identify areas where additional outreach or alternative engagement strategies may be necessary to ensure meaningful participation.

Community Connection of Northeast Oregon, Inc. has established relationships with Minority, Low-Income and LEP populations through other non-transportation programs and services. CCNO leverages these relationships to improve access to public transportation information and participation opportunities. Community leaders and members are consulted to inform program design and outreach approaches that best meet community needs.

As a result of these efforts, CCNO has observed increased engagement by Marshallese-speaking residents. CCNO will continue to build on these relationships and will actively participate in meetings and outreach opportunities involving Minority, Low-Income and LEP populations when coordinated through other Community Connection of Northeast Oregon, Inc. programs and services.

## Summary of Public Participation Efforts

CCNO complies with grant-related public involvement requirements as defined by grant application documents. The following is a summary of CCNO's public participation efforts over the last few years.

### Printed Materials

---

CCNO has translated service information on CCNO's website and published materials into Spanish. General information about CCNO's services is posted on CCNO's website in English and Spanish and translations to other languages are available upon request.

### Phone Access

---

CCNO communicates with non-English speaking individuals using online resources such as Google Translate and guides that contain Spanish translations for common transit phrases.

### Public Outreach

---

Over the past several years, CCNO has participated in multiple parades, resource fairs, Trunk or Treat, the county fairs, and other community festivals. We also hosted a resource fair with Northeast Oregon Network (NEON) to specifically branch out to the Pacific Islander and Latino communities. The goal of the hosted resource fair was to continue to raise awareness of CCNO for the non-English speaking communities. We had information available to the public in Marshallese, Marshallese and Spanish, with fliers and speaking staff on hand to answer questions. CCNO utilized local TAC members, friends, and social media to promote CCNO awareness. In the future, we will grow our outreach efforts to our Minority, Low-Income and LEP populations through more aggressive efforts on social media and increased community events to draw in participation to the CCNO planning process.

### Minority, Low-Income & LEP Populations Future Outreach

---

CCNO will continue to monitor the Minority, Low-Income and LEP populations in Baker, Union and Wallowa Counties based on census data. Community Connection of Northeast Oregon, Inc. has made advancements in providing LEP and Minority, Low-Income communities with other non-transportation related services. To serve marginalized populations, we have turned to community leaders and community members to tell us how programming can be best designed to meet their needs. Because of these efforts, we are seeing a greater number of Marshallese speaking citizens access our services overall. As these positive relationships continue to grow, CCNO will utilize the continued positive relationship to promote public transit. In the future, CCNO will actively participate in meetings with Minority, Low-Income, and LEP populations when they are presented through other services provided by CCNO.

## Title VI Equity Analysis

Community Connection of Northeast Oregon (CCNO) is aware of the Title VI requirement to conduct equity analyses for facility construction projects during the planning stage. CCNO will follow applicable requirements under the National Environmental Policy Act (NEPA) and other relevant planning and environmental review processes to ensure equitable consideration of facility locations and potential impacts on minority and low-income populations.

A facility project that results in a disparate impact may be advanced only if there is a substantial legitimate justification and no practicable alternatives. In such cases, CCNO will document the justification, evaluation of alternatives, and consideration of measures to avoid, minimize, or mitigate adverse impacts where feasible.

---

## List of Transit-Related Title VI Investigations, Complaints, and Lawsuits

CCNO has not been the subject of any transit-related Title VI investigations, complaints, or lawsuits filed with the Federal Transit Administration (FTA), the Oregon Department of Transportation (ODOT), or any other entity during the past three (3) years. CCNO will continue to monitor, document, and report any future Title VI-related complaints, investigations, or lawsuits in accordance with federal requirements.

## Deviated Fixed Route Service Standards and Policies

### Deviated Fixed Routes, Vehicle Headway

At CCNO we operate deviated fixed routes that compliment our demand response services. CCNO operates four deviated fixed routes on weekdays; two routes in La Grande, one route in Baker and one route in Enterprise. On Saturdays CCNO operates one deviated fixed route in La Grande, one deviated fixed route in Baker and one during the summer months in Enterprise. Deviated Fixed Route services were updated in Fiscal Year 2023, to run no later than every 45 minutes per town. We designed these routes to balance how often buses arrive with county coverage. Our service operates Monday through Friday from 7:30 a.m. to 5:45 p.m., and Saturdays from 8:15 a.m. to 4:30 p.m. We regularly review our bus frequency and timing to best serve our riders within our budget. Some services vary depending on location and time of year. Please reach out to your local county or check our website for the most up-to-date information. <https://ccno.org/public-transit/>.

## On-Time Performance

---

At Community Connection of Northeast Oregon (CCNO), a bus is considered late if it departs at a scheduled point five or more minutes after its published time (deviated fixed route). Schedules are intentionally padded by four to five minutes to allow for recovery at the end of each route.

Due to the operational nature of the Deviated Fixed Route (DFR) service, limited flexibility may be exercised regarding early departures. Vehicles may depart up to two minutes early, provided that no passengers are present at the stop; no flag-stop requests are active, and the early departure does not adversely affect riders who reasonably rely on the published schedule.

Local management may exercise discretion in these situations; however, early departures that result in missed passenger pickups are not permitted.

Because DFR service operates with deviations and flag stops, CCNO does not apply the same on-time performance monitoring standards used for traditional fixed-route services. Instead, CCNO focuses on maintaining consistent service delivery within the expected completion time of the route while continuing to accommodate designated flag stops.

## Service Availability

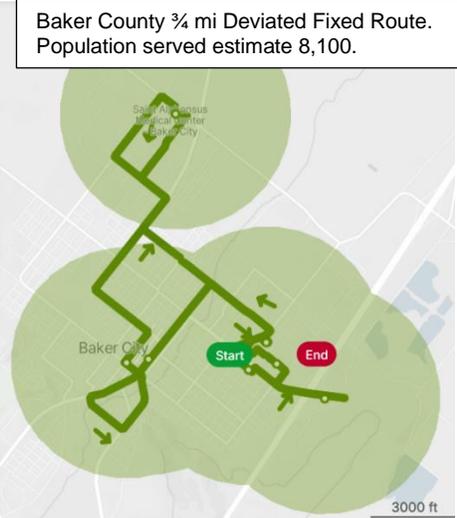
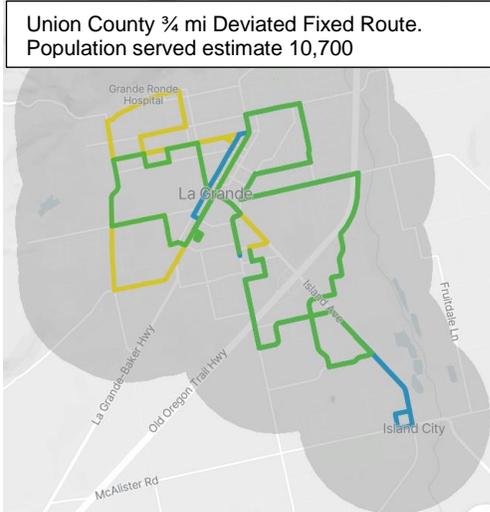
---

CCNO operates with the goal of ensuring that at least 35 percent of Baker, Union and Wallowa County residents live within three-quarters ( $\frac{3}{4}$ ) of a mile of a public transit service line. Transit access is evaluated by mapping all active public transit bus services operated by CCNO in Baker, Union, and Wallowa Counties and calculating the population residing within a  $\frac{3}{4}$ -mile buffer of those services, based on 2023 U.S. Census data. These estimates are compared to the total population within CCNO's service area.

CCNO's service area has a total population of 50,520. Deviated Fixed Route (DFR) service is provided in each county's primary community and is available to residents of all three counties.

For mapping purposes, population estimates shown reflect a  $\frac{3}{4}$ -mile radius from designated transit stops. Actual service coverage extends  $\frac{3}{4}$  mile from the route alignment, not solely from individual stops; therefore, the population served by DFR services is likely higher than the stop-based estimate shown. (see below).

Based on the ¾-mile radius from transit stops, approximately 39 percent of the total service area population is served by Deviated Fixed Route services and associated support services. This level of service meets and exceeds CCNO’s adopted 35 percent access goal. Additional population and service coverage data are provided in the Appendix.



County	Deviated Fix Route Service Population		
	¾ deviated fix	Total polulation	Percent served low end estimate
Baker	8100	16796	48%
Union	10700	26192	64%
Wallowa	1000	7532	6%

## Amenities

---

Community Connection of Northeast Oregon (CCNO) determines the distribution of transit amenities and vehicle assignments for each mode in a non-discriminatory manner, ensuring that services and amenities are not provided or withheld on the basis of race, color, or national origin, in accordance with Title VI requirements.

In Union County, there is one transit center/hub operated by Union County Public Transit (UCPT). The transit center includes a driver's breakroom, an information kiosk, and nearby parking spaces. In addition, there are five bus shelters located along the Deviated Fixed Route (DFR) path.

In Baker County and Wallowa County, CCNO operates primarily demand-response and deviated fixed route services. Transit amenities in these counties are limited due to lower passenger volumes, rural development patterns, site availability, and right-of-way constraints. Where feasible, amenities may include signage, benches, or shelters at higher-use locations or community hubs, subject to property owner permission and available resources.

Transit amenities are distributed throughout CCNO's deviated fixed-route system. The location of existing amenities was established through agency and Oregon Department of Transportation (ODOT) local processes prior to MAP-21, which included consideration of the following factors:

- Approval through the DEQ Categorical Exclusion process
- Ride demand volume
- Passenger requests
- Staff recommendations
- Public comment processes
- Site availability and right-of-way partnerships

For future projects, CCNO will use objective, data-driven criteria to guide amenity placement decisions, subject to property owner permission and available resources. Criteria may include, but are not limited to, the following:

Bus Shelters (with property owner permission):

- Stops where boarding volume exceeds 200 passengers per month
- At least 80% of shelters shall be located within Census Tracts with a population density of 1,000 persons per square mile or greater

Bus Stop Benches (with property owner permission):

- Stops where boarding volume exceeds 100 passengers per month

- No less than 50% of benches shall be located within Census Tracts with a population density of 1,000 persons per square mile or greater

Trash Receptacles (with property owner permission):

- Stops where boarding volume exceeds 100 passengers per month
- Placement is subject to CCNO's ability to service receptacles directly or through contracted collection services

All transit amenities shall be sited in a manner that is consistent with the racial, minority, and low-income population distributions within each county. CCNO will evaluate amenity placement decisions to ensure equitable outcomes and compliance with Title VI.

### MAP-21 Performance Alignment

---

Community Connection of Northeast Oregon (CCNO) aligns its Title VI and Limited English Proficiency (LEP) Plans with the Oregon Department of Transportation's (ODOT) implementation of the federal Moving Ahead for Progress in the 21st Century Act (MAP-21). Under MAP-21, CCNO adopts performance-based management practices to ensure that equitable access, service quality, and communication are continually measured and improved over time.

These principles guide CCNO's evaluation of on-time performance, language access, outreach effectiveness, and service delivery. Performance measures are reviewed annually in coordination with ODOT's Public Transit Division to support the State's performance targets under 49 U.S.C. 5301 and 49 CFR Part 625. This alignment ensures that CCNO's public transportation services remain equitable, data-driven, and consistent with federal performance management and civil rights standards.

### Vehicle Assignment Policy

---

Community Connection of Northeast Oregon (CCNO) assigns vehicles based on vehicle size and modal function to ensure safe, efficient, and appropriate service delivery. All vehicles are maintained in accordance with the Federal Transit Administration's State of Good Repair (SGR) standards.

CCNO vehicles are equipped with an equivalent level of passenger amenities and ADA accessibility, relative to vehicle age and design. When new vehicles are purchased, CCNO's standard practice is to replace vehicles with comparable vehicles serving the same function (like-for-like" replacement).

Given CCNO's maintenance standards and ongoing efforts to reduce both the overall size and average age of the fleet, vehicle age alone is not used as a proxy for vehicle condition and does not determine vehicle assignment.

## Language Assistance Plan

CCNO supports staff and makes efforts to accommodate LEP individuals through:

- Use of schedules, service guides, and other information available in Spanish.
- Use of Oregon Relay Spanish TTY service information on CCNO publications and website.
- Use of 'I Speak' cards by office staff and bus drivers. (available from US census website)
- Knowledge of local resources, if available, for interpreters.
- Use of published resources such as 'Basic Spanish for Transit Employees'
- Use of LEP family members or friends to serve as interpreters.  
*This strategy is not optimal for some situations involving personal crises or sharing financial information, as that is not a comfortable circumstance to place the child in. However, for simple requests, such as ride scheduling, and general information, this strategy can be appropriate.*
- Translation of written materials: CCNO has translated service information on CCNO's website and in published materials into Spanish.
- Usage of Google & Apple Translate: Every employee has a smart phone with access to a translatory app or website.

## LEP Monitoring and Updates to This Plan

A Limited English Proficient (LEP) Program is the obligation of each recipient of FTA funding (originated by Presidential Executive Order 13166 on August 11, 2000). LEP individuals are those for whom English is not their primary language and who have limited or no ability to speak, understand, read or write English. Under FTA C 4702.1B, agencies are required to take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of programs and activities for LEP individuals.

FTA Circular 4702.1B defines rules for the 'Safe Harbor' threshold of 1,000 people or 5% of the population, whichever is less.

CCNO service area does not meet this guideline threshold. CCNO will continue to monitor community demographics and develop LEP processes and procedures as needed to provide service to this population.

*1 See Appendix D, and E for additional details*

# Limited English Proficiency Plan (LEP)

## Purpose and Goals

---

In accordance with Title VI of the Civil Rights Act of 1964 and Federal Transit Administration (FTA) Circular 4702.1B, Community Connection of Northeast Oregon (CCNO) has conducted a Four-Factor Limited English Proficiency (LEP) Analysis. This analysis is used to determine the appropriate level of language assistance necessary to ensure meaningful access to CCNO's public transportation services for individuals with limited English proficiency in Baker, Union, and Wallowa Counties. The results of the Four-Factor Analysis inform CCNO's decisions regarding language assistance measures, translation of vital documents, and ongoing monitoring activities described in this section.

## Four-Factor Limited English Proficiency (LEP) Analysis Summary

### Factor 1: The Number or Proportion of LEP Persons Eligible to Be Served

---

CCNO analyzed the most recent U.S. Census American Community Survey (ACS) five-year estimates for its service area (see **Appendix D and Appendix E, pages 27–31**). The analysis indicates that the majority of residents in the CCNO service area speak English proficiently, with approximately **95.94 percent** of the population speaking only English. Spanish is the most common LEP language, representing approximately **0.52 percent** of the total service area population who speak English less than “very well.” All other LEP language groups are present in significantly smaller numbers.

No single LEP language group within the CCNO service area meets the FTA Safe Harbor threshold of **5 percent or 1,000 persons**, whichever is less. Therefore, CCNO is not required to provide written translation of vital documents beyond those currently translated; however, CCNO continues to monitor demographic data to identify emerging LEP populations (see **LEP Monitoring and Updates to This Plan, page 14**).

### Factor 2: The Frequency with Which LEP Persons Come Into Contact With the Program

---

CCNO experiences **limited and infrequent contact** with LEP individuals. When contact does occur, it is most commonly associated with trip scheduling, general service inquiries, and community outreach activities. Spanish-speaking individuals represent the majority of LEP contacts, with occasional interactions involving Marshallese-speaking residents, particularly in Union County. CCNO documents these interactions through its outreach and public participation activities (see **Public Participation Plan, pages 6–8**).

### Factor 3: The Nature and Importance of the Program, Activity, or Service Provided

---

CCNO provides essential public transportation services that support access to employment, medical services, education, shopping, and government programs. Because public transportation is considered a vital service, CCNO recognizes that the inability to access information or services due to language barriers may result in a disproportionate impact on LEP individuals. As such, CCNO considers this factor to weigh in favor of providing reasonable language assistance measures, consistent with available resources (see **Language Assistance Plan, page 14**, and **LEP Plan, pages 14–17**).

### Factor 4: The Resources Available to the Recipient and Costs

---

CCNO evaluates language assistance measures in relation to its available staffing, financial resources, and the size of the LEP population served. Current measures include translation of vital documents into Spanish, availability of bilingual staff when possible, use of translation applications, access to Language Line Solutions for telephonic interpretation, and use of “I Speak” cards by staff and drivers (see **Language Assistance Plan, page 14**, and **Limited English Proficiency Plan, pages 14–17**). These measures are considered reasonable, effective, and proportional to demonstrated need.

### Determination and Ongoing Monitoring

---

Based on the Four-Factor Analysis, CCNO has determined that its existing language assistance efforts are sufficient to ensure meaningful access for LEP individuals within its service area. CCNO will continue to monitor census data, service usage, and the frequency of LEP interactions and will update its LEP strategies as necessary to remain in compliance with Title VI requirements (see **LEP Monitoring and Updates to This Plan, page 14**).

### Determining Languages Eligible for LEP Programming

---

The languages into which CCNO will translate its vital documents are defined by the Safe Harbor provision of FTA Circular 4702.1B, Chapter III-9, Section (C), which states (in part):

*“The Safe Harbor Provision stipulates that if a recipient provides written translation of vital documents for each LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient’s written translation obligations.”*

CCNO uses the latest U.S. Census data to identify minority populations at risk of being underserved due to language barriers. Current LEP population data for CCNO can be found at: <https://data.census.gov/table?q=C16001&q=050XX00US41001,41061,41063>  
(See Appendix E for detailed data.)

## Strategies for Delivery of LEP Content

---

CCNO relies predominantly on the written translation of vital documents to deliver mobility system information to individuals with limited English proficiency. When more in-depth or interactive communication is required, CCNO utilizes the following strategies:

- Multilingual Staff (if available): Staff who have demonstrated proficiency and the ability to communicate accurately in both English and the needed LEP language.
- Google Translate: Utilized via smartphone or tablet with the voice speaker option for quick, on-the-spot communication when LEP barriers arise.
- Language Line Solutions: A professional interpretation call center that provides immediate translation and interpretation over the phone.  
<https://www.language.com/>

These combined methods ensure that communication with LEP individuals is accurate, timely, and effective.

## Determining Which Documents Are Vital

---

CCNO considers the following document types to be vital for ensuring seamless access to public transit services:

- Applications for service
- Bus passes and other forms or script
- Complaint forms and instructions on how to file
- Correspondence regarding public mobility services
- Information on provision of services to passengers with disabilities
- Notices of public outreach and comment meetings
- Notices of Right to Appeal (for all services)
- Riders' guides and route pamphlets

## Evaluations and Monitoring

---

The LEP Plan is subject to CCNO's triennial update rotation. As part of this process, CCNO will:

- Assess as accurately as possible the frequency with which it has (or should have) contact with LEP individuals seeking assistance.

- Consider the frequency and types of language contacts across different programs.
- Evaluate whether additional outreach to LEP populations could improve communication and service use.
- Update LEP group data using the most recent census releases.
- Inquire with local school districts within CCNO's service areas to identify emerging LEP populations.
- Identify staff training needs related to language assistance and cultural competency.
- Consult with representatives of known LEP groups to determine opportunities for improved communication and passenger participation.

### Monitoring and Updating the LEP Plan

As this plan is designed to be flexible and viewed as a living document, CCNO will continuously evaluate whether new services or documents should be made accessible to LEP persons.

Current efforts include ongoing research focused on Native Hawaiian and Other Pacific Islander populations in Union County and Spanish-speaking populations in Baker and Wallowa Counties to determine whether additional translated documents are necessary at this time.

CCNO will continue to monitor demographic changes, language trends, and service delivery needs. The LEP Plan will be reviewed and updated as necessary, and at a minimum, on a triennial basis, in compliance with U.S. Department of Transportation (DOT) requirements.

## **Board Composition and Minority Representation on Non-Elected Bodies**

CCNO is overseen by a Board of Directors, and the table depicting the membership of this Board as of January 2026 is below: A list of CCNO board can be seen at <https://ccno.org/board-of-directors/>

	Of Those Who Are Not Hispanic or Latino						
	White Alone	Black or African American Alone	Asian Alone	Native Hawaiian Alone	American Indian or Alaskan Native Alone	Some Other Race Alone	Two or more races
CCNO Board of Directors							

Community Connection of Northeast Oregon (CCNO) is governed by a Board of Directors that provides oversight of public transportation programs serving Baker, Union, and Wallowa Counties. In accordance with Title VI of the Civil Rights Act of 1964 and Federal Transit Administration (FTA) Circular 4702.1B, CCNO encourages the participation of minority populations in its Board and related advisory processes to the extent practicable.

CCNO promotes inclusive participation through the following actions:

- Posting information regarding opportunities for Board participation and public involvement on the CCNO website and through official communication channels, including social media;
- Providing notice of Board meetings and participation opportunities through public postings and community outreach, as appropriate; and
- Conducting direct outreach to community-based organizations, service providers, and agencies that represent minority populations and/or provide services to minority individuals when seeking input on transportation-related planning and policy matters.

These efforts are intended to ensure that minority populations have meaningful opportunities to participate in CCNO’s governance, planning, and decision-making processes related to public transportation.

## Appendix A: Signed Policy Statement

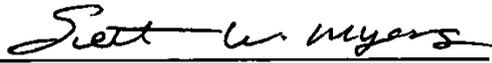
### **Title VI Non-Discrimination Policy Statement**

Community Connection of Northeast Oregon, Inc. (CCNO) is committed to ensuring compliance with the Title VI of the Civil Rights Act of 1964, which states:

“No person in the United States shall, on 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.”

#### **CERTIFICATION AND APPROVAL**

This policy was approved by the Board of Directors of Community Connection of Northeast Oregon, Inc. at its regular meeting on January 20, 2026.



Scott Myers – Chair, Board of Directors  
Community Connection of Northeast Oregon, Inc.

## Appendix B: Title VI Complaint Form (English)



### NORTHEAST OREGON PUBLIC TRANSPORTATION

### Title VI (CIVIL RIGHTS) and Title II (ADA) Complaint Form

For Baker, Union, & Wallowa  
Counties

#### A. Complainant's Information

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City/State/Zip Code: \_\_\_\_\_

Telephone Number (Home): \_\_\_\_\_

Telephone Number (Work): \_\_\_\_\_

Email Address: \_\_\_\_\_

Accessible Format Requirements? (Select One or More)

- Large Print
- TTY
- Audio Tape
- Other

#### B. Person Discriminated Against (if different than complainant)

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City/State/Zip Code: \_\_\_\_\_

Telephone Number (Home): \_\_\_\_\_

Telephone Number (Work): \_\_\_\_\_

Email Address: \_\_\_\_\_

Relationship to the person for whom you are complaining: \_\_\_\_\_

Please explain why you have filed for a third party: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



F. Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court? Yes or No

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

If you have checked above, please provide information about a contact person at the agency/court where the complaint was filed.

Name: \_\_\_\_\_  
Title: \_\_\_\_\_  
Address: \_\_\_\_\_  
City/State/Zip Code: \_\_\_\_\_  
Telephone Number (Home): \_\_\_\_\_  
Telephone Number (Work): \_\_\_\_\_  
Email Address: \_\_\_\_\_

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

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

Attachments: Yes \_\_\_\_\_ No \_\_\_\_\_

H. Submit form and any additional information to:

Mail to:  
Transportation Prog. MG  
Attn: Title VI/ADA Complaint  
2802 Adams Ave.  
La Grande, OR 97850

Email with the subject "Attn: Title VI/ADA Complaint"

<mailto:ada.titlevi@ccno.org>

## Appendix C: Title VI Complaint Form (Spanish)

### Title VI Complaint Form (Spanish)



#### NORTHEAST OREGON TRANSPORTE PÚBLICO

Formulario de quejas conforme al  
Título VI (Derechos Civiles) y al  
Título II (Ley de Estadounidenses  
con Discapacidades)

For Baker, Union, & Wallowa  
Counties

#### A. Información del denunciante

Nombre: \_\_\_\_\_  
Dirección: \_\_\_\_\_  
Ciudad/Estado/Código postal: \_\_\_\_\_  
Número de teléfono (Hogar): \_\_\_\_\_  
Número de teléfono (trabajo): \_\_\_\_\_  
Correo electrónico: \_\_\_\_\_

¿Requisitos de formato accesible? (Selecciona uno o más)

- Letra grande
- TTY
- Cinta de audio
- Otro

#### B. Persona discriminada (si es diferente a la denunciante)

Nombre: \_\_\_\_\_  
Dirección: \_\_\_\_\_  
Ciudad/Estado/Código postal: \_\_\_\_\_  
Número de teléfono (Hogar): \_\_\_\_\_  
Número de teléfono (trabajo): \_\_\_\_\_  
Dirección de correo electrónico: \_\_\_\_\_

Relación con la persona por la que te quejas: \_\_\_\_\_

Por favor, explica por qué has presentado la solicitud para un tercero: \_\_\_\_\_

\_\_\_\_\_

Por favor, confirme que ha obtenido el permiso de la parte perjudicada si presenta la solicitud en nombre de un tercero.

- Sí  
 No

**C. Base de la queja**

¿Cuál de las siguientes explicaciones describe mejor la razón por la que crees que se produjo la discriminación? (marca todo lo que corresponde)

- La raza                       Color                       Origen nacional  
 Discapacidad               Otra: \_\_\_\_\_

Otros (Por favor, explícalos)

---

---

**D. Fecha(s) de la supuesta discriminación o queja**

Fecha(s) \_\_\_\_\_

**E. Por favor, describa la supuesta discriminación. Explica lo que pasó y a quién crees responsable. Describe a todas las personas que participaron. Incluye el nombre y la información de contacto de la(s) persona(s) que te discriminaron (si se conoce), así como los nombres e información de contacto de cualquier testigo. Si necesitas espacio adicional, añade una hoja de papel.**

F. ¿Ha presentado esta queja ante alguna otra agencia federal, estatal o local, o ante algún tribunal federal o estatal? Sí o no

Agencia Federal \_\_\_\_\_  
Tribunal Federal \_\_\_\_\_  
Agencia Estatal \_\_\_\_\_  
Tribunal Estatal \_\_\_\_\_  
Agencia Local \_\_\_\_\_

Si has comprobado arriba, por favor proporciona información sobre una persona de contacto en la agencia/tribunal donde se presentó la queja.

Nombre: \_\_\_\_\_  
Título: \_\_\_\_\_  
Dirección: \_\_\_\_\_  
Ciudad/Estado/Código postal: \_\_\_\_\_  
Número de teléfono (Hogar): \_\_\_\_\_  
Número de teléfono (trabajo): \_\_\_\_\_  
Dirección de correo electrónico: \_\_\_\_\_

G. Por favor, firme abajo. Puedes adjuntar cualquier material escrito u otra información que consideres relevante para tu queja.

Firma \_\_\_\_\_ Fecha \_\_\_\_\_

Adjuntos: Sí \_\_\_\_\_ No \_\_\_\_\_

H. Envía el formulario y cualquier información adicional a:

Correo a:  
Transportation Prog. MG  
Attn: Queja del Título VI/ADA  
2802 Adams Ave.  
La Grande, OR 97850

Correo electrónico con el asunto "Atención: Queja del Título VI/ADA"

<mailto:ada.titlevi@ccno.org>

## Appendix D- Population Census Data

<https://data.census.gov/table?q=Baker+County+Oregon&t=Race+and+Ethnicity&g=050XX00US41061,41063>

Label	Baker County, Oregon	Union County, Oregon	Wallowa County, Oregon
▼ Total:	16,668	26,196	7,391
Hispanic or Latino	809	1,347	257
▼ Not Hispanic or Latino:	15,859	24,849	7,134
▼ Population of one race:	15,083	23,272	6,746
White alone	14,664	22,075	6,598
Black or African American alone	70	145	9
American Indian and Alaska Native alone	172	219	50
Asian alone	64	216	31
Native Hawaiian and Other Pacific Islander alone	15	488	4
Some Other Race alone	98	129	54
▼ Population of two or more races:	776	1,577	388
> Population of two races:	746	1,499	358
> Population of three races:	18	62	24
> Population of four races:	12	15	2
> Population of five races:	0	1	0
▼ Population of six races:	0	0	4
White; Black or African American; American Indian and Alaska Native; Asian; Nati...	0	0	4

## Appendix E: Census Data for Language Spoken at Home

Estimated numbers generated since 2023 ACS 5 year

<https://data.census.gov/table?q=C16001&q=050XX00US41001,41061,41063>

Label	Baker County, Oregon	
	Estimate Baker	
Total:	16,031	
Speak only English	15,610	97.37%
Speak Spanish and English less than "very well"	59	0.37%
Speak French, Haitian, or Cajun and English less than "very well"	0	0.00%
Speak German or other West Germanic and English less than "very well"	0	0.00%
Speak Russian, Polish, or other Slavic and English less than "very well"	0	0.00%
Speak Indo-European and English less than "very well"	13	0.08%
Speak Korean and English less than "very well"	7	0.04%
Speak Chinese (incl. Mandarin, Cantonese) and English less than "very well"	0	0.00%
Speak Vietnamese and English less than "very well"	0	0.00%
Speak Tagalog (incl. Filipino) and English less than "very well"	0	0.00%
Speak Asian and Pacific Island and English less than "very well"	8	0.05%
Speak Arabic and English less than "very well"	0	0.00%
Speak Other and unspecified languages and English less than "very well"	0	0.00%

	<b>Union County, Oregon</b>	
<b>Label</b>	<b>Estimate</b>	
Total:	24,905	
Speak only English	23,649	94.96%
Speak Spanish and English less than "very well"	144	0.58%
Speak French, Haitian, or Cajun and English less than "very well"	0	0.00%
Speak German or other West Germanic languages and English less than "very well"	9	0.04%
Speak Russian, Polish, or other Slavic languages and English less than "very well"	8	0.03%
Speak Other Indo-European languages and English less than "very well"	0	0.00%
Speak Korean and English less than "very well"	0	0.00%
Speak Chinese (incl. Mandarin, Cantonese) and English less than "very well"	43	0.17%
Speak Vietnamese and English less than "very well"	0	0.00%
Speak Tagalog (incl. Filipino) and English less than "very well"	0	0.00%
Speak Other Asian and Pacific Island languages and English less than "very well"	19	0.08%
Speak Arabic and English less than "very well"	0	0.00%
Speak Other and unspecified languages and English less than "very well"	0	0.00%

	<b>Wallowa County, Oregon</b>	
<b>Label</b>	<b>Estimate Wallowa</b>	
Total:	7,167	
Speak only English	6,889	96.12%
Speak Spanish and English less than "very well"	48	0.67%
Speak French, Haitian, or Cajun and English less than "very well"	0	0.00%
Speak German or other West Germanic languages and English less than "very well"	0	0.00%
Speak Russian, Polish, or other Slavic languages and English less than "very well"	0	0.00%
Speak Other Indo-European languages and English less than "very well"	20	0.28%
Speak Korean and English less than "very well"	0	0.00%
Speak Chinese (incl. Mandarin, Cantonese) and English less than "very well"	13	0.18%
Speak Vietnamese and English less than "very well"	0	0.00%
Speak Tagalog (incl. Filipino) and English less than "very well"	6	0.08%
Speak Other Asian and Pacific Island languages and English less than "very well"	4	0.06%
Speak Arabic and English less than "very well"	0	0.00%
Speak Other and unspecified languages and English less than "very well"	0	0.00%

## CCNO Full Service Area

<https://data.census.gov/table?q=C16001&q=050XX00US41001,41061,41063>

	CCNO Service Area				
Label	Estimate Baker	Estimate Union	Estimate Wallowa	CCNO Service Area	
Total:	16,031	24,905	7,167	48,103	
Speak only English	15,610	23,649	6,889	46,148	95.94%
Speak Spanish and English less than "very well"	59	144	48	251	0.52%
Speak French, Haitian, or Cajun and English less than "very well"	0	0	0	0	0.00%
Speak German or other West Germanic and English less than "very well"	0	9	0	9	0.02%
Speak Russian, Polish, or other Slavic and English less than "very well"	0	8	0	8	0.02%
Speak Indo-European and English less than "very well"	13	0	20	33	0.07%
Speak Korean and English less than "very well"	7	0	0	7	0.01%
Speak Chinese (incl. Mandarin, Cantonese) and English less than "very well"	0	43	13	56	0.12%
Speak Vietnamese and English less than "very well"	0	0	0	0	0.00%
Speak Tagalog (incl. Filipino) and English less than "very well"	0	0	6	6	0.01%
Speak Asian and Pacific Island and English less than "very well"	8	19	4	31	0.06%
Speak Arabic and English less than "very well"	0	0	0	0	0.00%
Speak Other and unspecified languages and English less than "very well"	0	0	0	0	0.00%