

United Community Action Program, Inc.

Cimarron Public Transit System

TITLE VI
Nondiscrimination
And
Limited English Proficiency Plan

Adopted September 19, 2017

Revised May 2021

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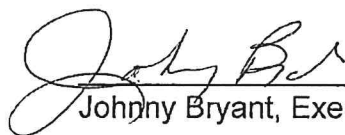
Cimarron Public Transit System
Nondiscrimination Assurances

Cimarron Public Transit System (CPTS) agrees to comply with all provisions prohibiting discrimination on the basis of race, color, or national origin of Title VI of the Civil Rights Act of 1964, as amended, 42 U.S.C. 200d et seq., and with U.S. DOT regulations, "Nondiscrimination in Federally-Assisted Programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act," 49 CFR Part 21.

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

CPTS meets the objectives of the FTA Master Agreement which governs all entities applying for FTA funding, including CPTS and its third-party contractors by promoting actions that:

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



Johnny Bryant, Executive Director

UCAP Mission Statement: To improve people's lives, embody the spirit of hope, and in partnership with communities, help low-income people lift themselves out of poverty by providing services and opportunities for increased self-sufficiency and greater participation in the community.

Cimarron Public Transit System Mission Statement: To provide safe and reliable public transportation in the Cimarron Public Transit System service area.

History: United Community Action Program, Inc. (UCAP) was incorporated on January 24, 1969, and awarded status as a 501 © 3 charitable and educational corporation on June 17, 1969. The agency is a non-profit public service agency that strives to implement the national and statewide promise of community action: to change people's lives, embody the spirit of hope, improve communities and make America a better place to live. The agency began its rural public transit program in 1999. Currently, the program operates in and around Creek, Kay, Osage, Pawnee, Washington and Nowata counties.

Service Area: (See service area map, Appendix A.)

Cimarron Public Transit System provides shared ride, curb to curb, and demand response service covering 5,238 square miles in Creek, Kay, Osage, Pawnee and Washington Counties. Service includes the city limits of Bristow, Drumright, Kellyville, Kiefer, Mannford, Oilton and Sapulpa, with limited service throughout Creek County, located in Northeastern Oklahoma; the city limits of Ponca City and Newkirk, with limited service throughout Kay County, located in North Central Oklahoma; the city limits of Bartlesville and Dewey, with limited service throughout Washington County, located in Northeastern Oklahoma; limited service in Cleveland and around Pawnee County, located in North Central Oklahoma; and in the city limits of Fairfax, Pawhuska, Hominy and Skiatook, with limited service throughout Osage County, located in Northeastern Oklahoma. Limited service includes other originations and destinations within each county noted, as resources and availability permit.

Population and Demographics: Creek, Kay, Osage, Pawnee and Washington Counties have a total estimated population of 233,709 as defined by the US Census Bureau, 2024 estimates.

DEMOGRAPHIC CHARACTERISTICS			
<u>Population</u>		<u>Dwelling Units</u>	
Total	233,709	Owner Households	172,878
Under 18	60,042		
Over 65 and Older	46,583	<u>Race</u>	
<u>Total Disabled</u>		White	189,320
Under 65	29,384	Black or African American	4,752
		Native American (Indian)	25,136
<u>Income</u>		Asian	2,133
Median Household Income	61,499	Hispanic or Latino	14,372
		Veterans	12,729

Persons Below Poverty Level*	35,695	Language other than English spoken at home	10,209
		Speak English Less than very well	2,686

Title VI and LEP Plan Coordinator

Name: Laura Corff

Address: 501 Sixth Street, Pawnee, OK 74058

Telephone number: (918) 762-3041 Ext. 181 Email Address: lcorff@ucapinc.org

The Title VI Coordinator attends Title VI training provided by Federal Transit Administration, the Office of Mobility and Public Transit, Oklahoma Department of Transportation, South West Transit Association and Community Transportation Association of America.

Governing Body

Individuals selected to the board as directors shall be elected/selected for designated terms. "Terms" shall not exceed three (3) years. There is no limit to the number of terms a representative may serve.

Composition of the United Community Action Program, Inc. Board of Directors

Total Members			Board of Directors: Members Who Are Age 60 Or Over							
			Total Age 60+	Black Age 60+	Hispanic Age 60+	Asian Age 60+	American Indian Age 60+	Disabled Age 60+	Rep. Low Income Age 60+	Consumer Age 60+
12	5/41%	0	8/66%	0	0	0	5/41%	0	4/33%	0

Constructed Facilities – Title VI Equity Analysis

CPTS has not constructed, nor does the program have any plans to construct a transit facility.

Subrecipients

CPTS currently has no subrecipients and does not anticipate having any in the future.

Notice to the Public of Rights

Cimarron Public Transit System provides services in a consistent manner without regard to race, color, national origin. Title VI of the Civil Rights Act of 1964, as amended, and 49 CFR Part 21 prohibits discrimination based on race, color or national origin. The agency's Title VI Nondiscrimination and LEP Plan is posted on the agency website (<https://ucapinc.org/cpts>). Cimarron Public Transit does not discriminate against limited English Proficiency persons based on EO 13166. CPTS does not discriminate against minority and low-income communities based on EO 12898. Title VI notices will be posted at each transit site and on vehicles. Notices include who can file a complaint and information about how to submit a complaint. See Appendix C.

Members of the public may obtain additional information regarding Cimarron Public Transit System Title VI Nondiscrimination and LEP obligations by contacting the Title VI and LEP Plan coordinator.

Procedures for Filing A Complaint

The complaint procedures apply to the beneficiaries of Cimarron Public Transit System (CPTS) programs, activities and services.

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

How to file a complaint: Information on how to file a Title VI complaint is posted on the agency website (<https://ucapinc.org/cpts>), and available at each transit site. (The Cimarron Public Transit System complaint form is included as Appendix B.) A copy may be requested by writing to 501 Sixth Street, Pawnee, OK 74058, or by emailing Title VI Coordinator (lcorff@ucapinc.org). Information on how to file a Title VI complaint may also be obtained by calling Cimarron Public Transit System Title VI Coordinator at 918-762-3041 Ext 181.

A signed, dated complaint may be submitted no more than 180 days from the date of the alleged incident. The complaint should include:

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

Complaints should be submitted to CPTS Title VI Coordinator at 501 Sixth Street, Pawnee, OK 74058.

Complaint Acceptance: CPTS will only process complaints that are complete. Once a completed Title VI Complaint Form is received, CPTS shall review it to determine if CPTS has jurisdiction. The complainant will receive an acknowledgement letter informing him/her whether the complaint will be investigated by CPTS.

Investigations: CPTS shall generally complete an investigation within 90 days from receipt of a completed complaint form. If more information is needed to resolve the case, CPTS may contact the complainant. Unless a longer period is specified by CPTS, the complainant will have ten (10) days from the date of the letter to send requested information to the CPTS investigator assigned to the case.

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

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

A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.

A Letter of Finding (LOF) summarizes the allegations and provides an explanation of the corrective action taken.

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

If information is needed in another language, contact CPTS at 501 Sixth Street, Pawnee, OK or call 918-762-3041 Ext. 181.

Documenting Complaints, Investigations, and Lawsuits

All Title VI complaints, investigations and lawsuits filed against Cimarron Public Transit System shall be entered and tracked in a Cimarron Public Transit System complaint log, see Appendix D. Active investigations will be monitored for timely response on the part of all parties. The Title VI Coordinator shall maintain the log.

Cimarron Public Transit System shall maintain correspondence and documentation related to Title VI complaints, including:

- Date the complaint was filed
- Complainant name and contact information
- Complainant's race, color, sex and national origin
- Summary of allegations
- Status of Title VI complaints, investigations and lawsuits
- Actions taken
- Closure letter stating that there was not a Title VI violation and case is closed
- Date of closure letter or letter of finding

Limited English Proficiency

The original LEP plan was adopted by the United Community Action Program, Inc. Board of Directors on November 13, 2012. The plan was reviewed and revised by the board in November of 2016, September 19, 2017, May 18, 2021, May 17, 2022, July 22, 2025 and November 18, 2025.

INTRODUCTION

This *Limited English Proficiency* Plan has been prepared to address Cimarron Public Transit's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English proficiency language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

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

Plan Summary

Cimarron Public Transit System developed this Limited English Proficiency Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services provided. As defined by Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

In order to prepare this plan, Cimarron Public Transit System used the four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served by Cimarron Public Transit System.
2. The frequency with which LEP persons may be served by Cimarron Public Transit ~~Services~~.
3. The nature and importance of services provided by the Cimarron Public Transit System to the LEP population.
4. The interpretation services available to Cimarron Public Transit System and overall cost to provide LEP assistance. A summary of the results of the four-factor analysis is in the following section.

MEANINGFUL ACCESS: FOUR-FACTOR ANALYSIS

- 1. The number or proportion of LEP persons in the service area who may be served or are likely to require Cimarron Public Transit services.**

Cimarron Public Transit staff reviewed the linguistic diversity of LEP population data from the LEP.Gov Data and Language Maps to determine that 2,686 or <1% of population in the Cimarron Public Transit service area, speak English “less than very well”.

- 2. The frequency with which LEP persons come in contact with Cimarron Public Transit services.**

Cimarron Public Transit staff reviewed the frequency with which the board, office staff and drivers have, or could have contact with LEP persons. This includes phone inquiries or office visits. To date, Cimarron Public Transit has had no requests for interpreters and no requests for translated program documents. The board, office staff and drivers have little contact with LEP persons. Those LEP persons who do come into contact with staff typically have a family member, employer or friend to assist with translation, if needed.

- 3. The nature and importance of services provided by Cimarron Public Transit to the LEP population.**

There is no large geographic concentration of any type of LEP individuals in the Cimarron Public Transit service area. The overwhelming majority of the population speaks only English. Through outreach and research efforts, staff have not identified any social, service, professional and leadership organizations within the Cimarron Public Transit service area that focus on outreach to LEP individuals. Cimarron Public Transit board, office staff and drivers are most likely to encounter LEP individuals through transportation rides, office visits, phone conversations and attendance at public meetings.

- 4. The resources available to Cimarron Public Transit, and overall costs to provide LEP assistance.**

Cimarron Public Transit reviewed its available resources and determined a bi-lingual transit staff member is available to assist with Spanish translation, as necessary. Ray of Hope, in Bartlesville, reported staff are also available to assist with translation, as needed.

The Ridership Policy, Title VI Notice to the Public and WorkRide Form were decided as the most likely documents to need to be translated into Spanish. Each transit site has copies available for use. Spanish Translation Wallet cards are available to assist in communicating with an LEP person who speaks Spanish. The website and brochures have a Title VI notice in Spanish, to make a request, or should information be needed in another format. Google Translate has successfully been used as a tool to provide translation assistance, when needed.

LANGUAGE ASSISTANCE

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English proficient person and may be entitled to language assistance with respect to Cimarron Public Transit services. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language.

How Cimarron Public Transit staff may identify a LEP person who needs language assistance:

- Cimarron Public Transit staff can be provided “I Speak” cards to assist in identifying the language interpretation needed, if the occasion arises.
- Cimarron Public Transit staff will be informally surveyed periodically on their experience concerning contacts with LEP persons.
- When Cimarron Public Transit sponsors an informational meeting or event, an advanced public notice of the event will likely be published in local newspapers, including an opportunity to request accommodation. Additionally, a staff person may greet participants as they arrive. By informally engaging participants in conversation, it is possible to gauge each attendee’s ability to speak and understand English. Although translation may not be able to be provided at the event, this process will help identify the need for future events.

Language Assistance Measures

Although there is a very low percentage of LEP individuals, that is, persons who speak English “not well” or “not at all”, in Cimarron Public Transit System’s service area, the agency will strive to offer the following measures:

Cimarron Transit staff shall take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating in English.

The following resources will be utilized to accommodate LEP persons:

- Transit staff will communicate identification of LEP individuals to the LEP Plan Coordinator.
- Transit staff will work with family members, employers, and/or friends to communicate.
- Transit staff will use Spanish Translation Wallet Cards, if necessary.
- Volunteer interpreters for the Spanish language will be contacted for availability within a reasonable time period, as needed.
- Attempts shall be made for language interpretation for all other languages through Google Translate or telephone interpretation services, as needed and available.

STAFF TRAINING

Title VI and LEP training shall be provided to Cimarron Public Transit System staff. Examples of recent training are listed below:

- New Hires shall receive a copy of the policy, review contents and sign acknowledgment during orientation.
- Admin shall encourage transit staff to report requests for language assistance.
- Transit staff shall be coached on how to handle a potential Title VI/LEP complaint, as needed.
- Transit staff completed Sensitivity Refresher training in July of 2024, which included a Sensitivity video.
- Transit staff complete annual training related to HIPPA, confidentiality, ethics, equal opportunity, waste, fraud, cultural awareness, mutual respect and respect for individuals with disabilities.
- Title VI Coordinator participated in FTA Civil Rights RIR Training in January 2022.
- Staff received refresher training 'Notifying Public of Rights Under Title VI in 2022 and 2025.
- This revision of the Title VI and LEP plan will be disseminated to all transit staff in, after board adoption. Acknowledgment of receipt and understanding of the revision shall be documented and a copy maintained in each staff person's personnel file.

TRANSLATION OF DOCUMENTS

Cimarron Public Transit weighed the cost and benefits of translating documents for potential LEP groups. Considering the expense of translating documents, the likelihood of frequent changes in documents and other relevant factors, at this time the Notifying the Public of Rights Under Title VI, Ridership Policy and Work Ride Form have been translated into Spanish.

Due to the small local LEP population, Cimarron Public Transit does not have a formal outreach procedure in place. Translation resources are limited in this region. However, when and if the need arises for LEP outreach, Cimarron Public Transit will consider available options.

When staff prepares a document or schedules a meeting, for which the target audience is expected to include LEP individuals, documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.

MONITORING

Cimarron Public Transit shall update the LEP Plan as required. At a minimum, the plan shall be reviewed and updated when data from the new Census is available, or when it is clear higher concentrations of LEP individuals are present in Cimarron Public Transit service area. Updates will consider the following:

- The number of documented LEP individuals encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.

- Determination as to whether the need for translation services has changed.
- Determine whether Cimarron Public Transit's financial resources are sufficient to fund language assistance resources needed.
- Determine whether Cimarron Public Transit fully complies with the goals of this LEP Plan.
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals.
- Maintain a Title VI compliant log including LEP to review and determine issues and basis of complaints. (See Appendix D)

DISSEMINATION OF CIMARRON PUBLIC TRANSIT LEP PLAN

Cimarron Public Transit System shall notify LEP persons of the LEP Plan and how to access language services, by posting signs at conspicuous and accessible locations, which may include but not be limited to the following:

- United Community Action Program, Inc. website, <https://ucapinc.org/cpts>
- Cimarron Public Transit System sites
- Cimarron Public Transit System brochures
- Press releases, public notices and agendas will provide an opportunity to request an accommodation related to offering a translator (LEP) or interpreter (sign language for hearing impaired individuals) the public that they can request information in another format or language by calling 918-762-3041 Ext. 181. A Spanish translation of the Notice to the Public is posted below the English version of notices.

Title VI and LEP Public Participation Plan

It is Cimarron Public Transit System's intent to provide an opportunity for public involvement and full access to the transportation decision-making process in each stage of the planning and development of a transportation project to all segments of the population, including minority or low-income communities and populations who are not proficient in English. Public forums are scheduled annually, inviting the public to participate in the transportation plan. These opportunities will likely remain virtual, as greater participation has been achieved with this option. Legal notices will be published in the classified section of the largest newspapers in each county, at least two consecutive weeks regarding a notice opportunity. Letters will be mailed to elected officials, tribes, and private transit providers. Mass email notices will be sent to businesses, contract representatives, chambers, partners and social service organizations. Posts will also be made on the CPTS Facebook page and agency website.

To encourage the participation of minorities, the agency by-laws outline board membership. At least one-third of the Governing Board must be comprised of elected public officials, currently holding office or their representatives. At least one-third of the directors shall be persons chosen in accordance with democratic selection procedures adequate to ensure members are representative of low-income individuals and families in the neighborhood served. The remainder shall be officials or members of business, industry, labor, religious, law enforcement, education or other major groups and interests in the community served.

It should be noted that CPTS transit riders and clients are not asked questions about ethnicity when a trip is scheduled. Cimarron Public Transit System does not request or track this information, except with the WorkRide and Title III participation. Cimarron Public Transit System has two senior advisory committees: Creek/Osage County Senior Advisory Council and Pawnee County Senior Advisory Council. This advisory body provides insight and feedback to the agency. These non-elected individuals review current and proposed activities of senior projects. Members are invited by transit administration and/or recommended by advisory members or representatives of social service organizations to participate. Meetings are open to the public.

Surveys are disseminated to senior participants in Creek, Osage and Pawnee Counties, annually. Surveys can be completed throughout the year for the general ridership to provide feedback.

Composition of Cimarron Transit– Creek/Osage County Senior Advisory Council

Advisory Council	Total Minority	Total Disabled	Total 60+	Afr. Amer. 60+	Hispanic 60+	Asian 60+	American Indian 60+	Disabled 60+	Low Income 60+	Consumer 60+
6	2	2	6	1	0	0	1	1	5	5

Composition of Cimarron Transit – Pawnee County Senior Advisory Council

# Council	Total Minority	Total Disabled	Total 60+	Af. Am 60+	Hispanic 60+	Asian 60+	Am Indian 60+	Disabled 60+	Low income 60+	Consumer
4	1	3	4	0	0	0	1	3	4	4

Cimarron Public Transit Outreach Practices

Cimarron Public Transit System ensures all outreach strategies, communications and public involvement efforts comply with Title VI. Cimarron Public Transit System's Public Participation Plan proactively initiates the public involvement process and makes concerted efforts to involve members of all social, economic and ethnic groups. Events such as public forums are held at public or non-profit locations, are easily accessible to public transit, held convenient times and in compliance with the Americans with Disabilities Act.

Aligned with the above-referenced communication tactics, Cimarron Public Transit System provides the following:

1. Title VI Non-discrimination and LEP Plan on website at <https://ucapinc.org/cpts>
2. Title VI Notice to the public displayed at Transit Sites and in Transit Vehicles.
3. Upon advance notice, volunteer translators may be provided.
4. Upon advance notice, agency communication materials may be available in languages other than English, as needed.

Title VI and LEP Public Engagement Process

Cimarron Public Transit System shall conduct a Public Engagement Process as part of the public forums held annually in the first quarter of the calendar year. This process will seek input, provide education and highlight key components of the Title VI Plan. This plan has been created to explain Title VI policies as well as provide education on how the policies relate to minority populations.

Cimarron Public Transit System conducted a public comment period to provide opportunities for feedback on the Title VI Non-discrimination and LEP Plan. The comment period coincided with the 14 days following the second publication of the last legal notice published in the service areas.

Comments were accepted during the public outreach period via:

- Email address
- Regular mail at 501 Sixth Street, Pawnee, OK 74058
- Telephone
- In person

Cimarron Public Transit System will provide a briefing to the Board of Directors and senior advisory committee regarding all public comments, as needed and requested, prior to decision making. A summary report will be compiled, including all individual comments. The report will be available upon written request.

Public Outreach Efforts

Cimarron Public Transit System engages in many activities to disseminate information about the program in and around the communities it serves up to and including the following:

- Post updates and flyers through social media.
- Host annual public forums.
- Publish notices of opportunity in the legal section of major newspapers in the service area each year.
- Maintain memberships in local Chambers of Commerce in Bartlesville, Drumright, Pawnee, Pawhuska, Ponca City, Sapulpa and Skiatook. These organizations make referrals to CPTS. Transit staff network with members and provide program updates, as needed and requested.
- Remain actively involved in the communities of the areas served by the transit program to and maintain a high public awareness with community leaders and social service agencies. Involvement includes participation in local coalitions, committees and initiatives, outreach efforts, as well as meetings with community leaders, elected officials and representatives of agencies, as a regular course of business.
- Make presentations to civic and non-profit organizations, as requested.
- Publish program brochures and disseminate same throughout communities, via drivers, at transit sites, social service organizations in the service area and as email attachments when communicating with new partners or riders.
- Disseminate business cards during the regular course of business.
- Disseminate surveys to Creek/Osage and Pawnee County seniors each year.
- The agency conducts a customer satisfaction survey of clients, which is ongoing throughout the year.
- Triennially participate in the agency's community assessment, disseminating surveys to stakeholders such as partners, contractors and social service agency representatives.

Summary of Cimarron Public Transit System's Outreach Efforts from 2023 - September 2025

Participated in Creek County Coalition Partnership, Kay County Team and Osage County Coalition meetings.

- Participated in Pawnee County Healthy Coalition and Kay County Healthy Living Initiatives.
- Participated in Ponca City Chamber Ponca Politics and Ponca City Chamber Community Development Committees.

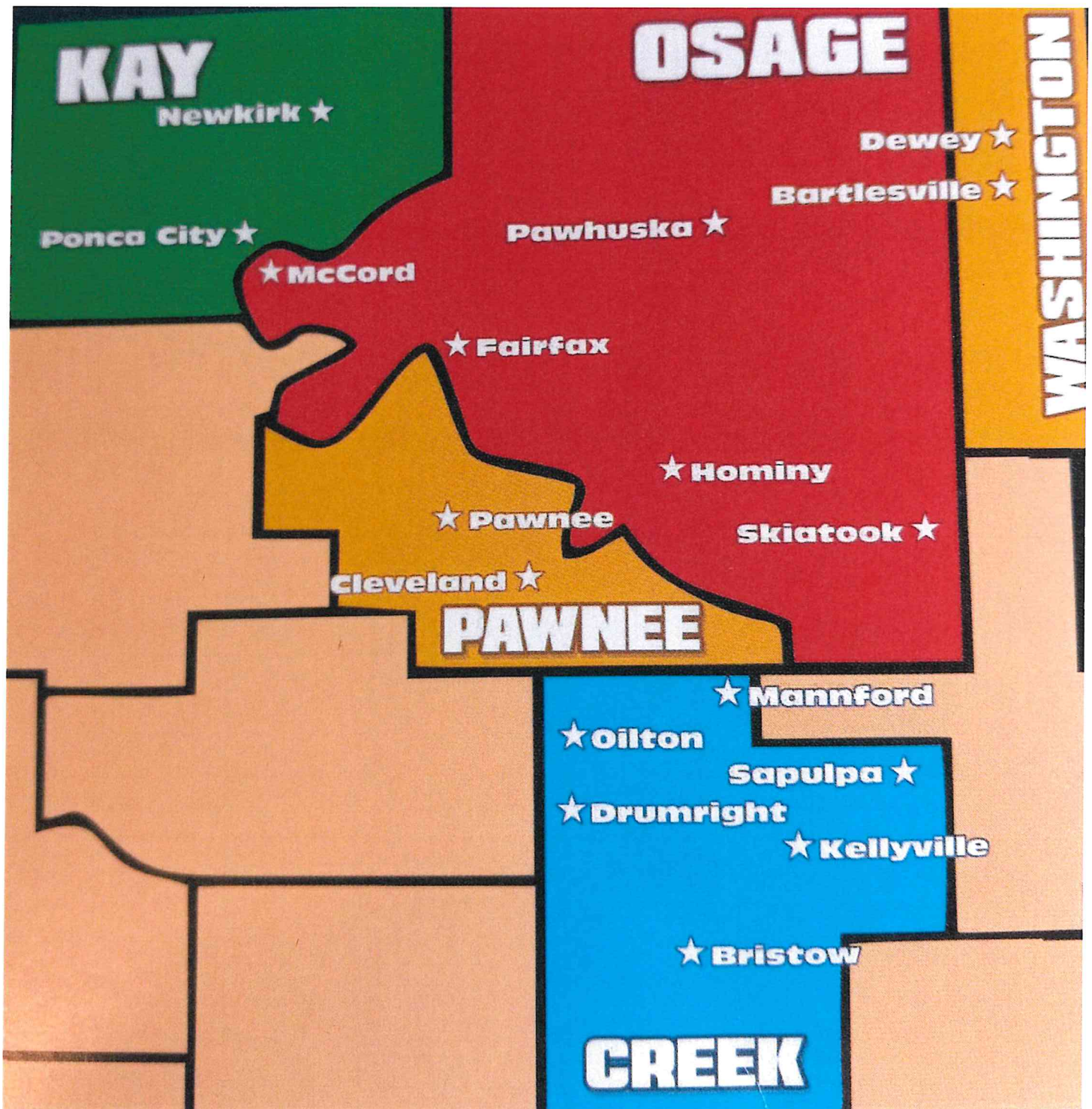
- Coordinated the Creek/Osage Advisory Council and Pawnee County Senior Advisory Council.
- Disseminated satisfaction surveys to seniors in Creek/Skiatook and Pawnee counties Ponca City; compiled information and shared with grant administrators and senior advisory councils in last quarter of 2022, 2023, 2024 and 2025.
- Maintained partnerships with other transit providers for the Veterans Ride Connect and PICK Mobility on Demand projects.
- Maintained communication with local health departments, hospitals, dialysis centers and mental health facilities.
- Sustained communication with city leaders, legislators and congressional staff.
- Partnered with Cherokee Nation, Kaw Nation, Delaware Tribe, Osage Nation, Pawnee Tribe, Ponca Tribe, Muscogee Creek Nation, Iowa Tribe and White Eagle Transit representatives.
- Published opportunity notices in the legal section of major newspapers.
- Participated in Section 5310 coordination meetings for Northwest and Northeast Regions, including Northeast RTPPO.
- Submit press releases to the Drumright Gusher, Cleveland American, Pawnee Chief, Ponca City News and Sapulpa Times. And City Beat enewsletter.
- In January 2023, 2024 and 2025 email blasts and letters were sent to private providers, Tribes, elected officials, social service agencies, outreach contacts and partners sharing dates and locations of public forums.
- Virtual public forums were held in January 2024 and 2025.
- Contact information is published on following websites: Sapulpa Chamber of Commerce, Skiatook Chamber, Ponca City Chamber, City of Bartlesville, Bartlesville Chamber, Cherokee Nation and South West Transit Association. Oklahoma Association of Community Action Agency, RTAPok.org, ODOT and SWTA websites include a direct link to the agency website.
- Listings and ads purchased in Sapulpa, Ponca City, Skiatook and Bartlesville Chamber directories which are distributed throughout the community and to new residents and businesses.
- The City of Ponca City includes CPTS and the local ride line in the weekly Media Tip Sheet, which is distributed to leaders and organizations throughout the community.
- Contact information is available in the Creek County, Kay County and Pawnee County Resource Guides.
- Bristow News publishes information in Community Events section on a regular basis 2023, 2024 and 2025.
- Participated in Ponca City Library Resource Fair in September 2022, 2023, 2024 and 2025.
- 2023 and 2024 Annual reports disseminated to stakeholders and partners.
- Hard copies and pdf versions of Program Brochures available and shared throughout the year.

Summary of Cimarron Public Transit System's 2020 through April 2022 Outreach Efforts

- In February of 2022, customer satisfaction surveys translated into Spanish were mailed or hand delivered to known LEP riders. A Spanish translation of the Notifying the Public of Rights was included in the packet.
- Participated in Creek County Coalition Partnership.
- Participated in Pawnee County Healthy Coalition and Kay County Healthy Living Initiatives.
- Participated in Ponca City Chamber Ponca Politics and Community Development Committees.
- Coordinated the Creek/Osage and Ponca City Senior Advisory Councils.

- Disseminated satisfaction surveys to seniors in Creek/Osage and Ponca City; compiled information and shared with grant administrators and senior advisory councils in last quarter of 2020 and 2021.
- Maintained partnerships with other transit providers for the Veterans Transportation Community Living Initiative and PICK Mobility on Demand Pilot Project.
- Maintain partnerships with other transit providers for the PICK on demand mobility project.
- Maintained communication with local health departments, hospitals, dialysis centers and mental health facilities.
- Sustained communication with city leaders, legislators and congressional field staff.
- Partnered with Cherokee Nation, Kaw Nation, Delaware Tribe, Osage Nation, Muscogee Creek Nation, Iowa Tribe and White Eagle Transit representatives.
- Publish opportunity notices in the legal section of major newspapers.
- Submit press releases in the Drumright Gusher, Cleveland American, Pawnee Chief, Ponca City News and Sapulpa Times. City of Bartlesville - City Beat enewsletter publishes articles.
- In January 2021, email blasts and letters were sent to private providers, Tribes, elected officials, social service agencies, outreach contacts and partners sharing dates and locations of public forums.
- In January 2022, email blasts and letters were sent to private providers, Tribes, elected officials, social service agencies, outreach contacts and partners sharing dates and locations of public forums.
- Virtual public forums were held in February of 2021 and 2022.
- Updated agency website, link: <https://ucapinc.org/cpts>
- Contact information published on following websites: Sapulpa Chamber of Commerce, Skiatook Chamber, Ponca City Chamber, City of Bartlesville, Bartlesville Chamber, Cherokee Nation and South West Transit Association. Oklahoma Association of Community Action Agency, RTAPok.org, ODOT and SWTA websites include a direct link to the agency website.
- Listings and ads purchased in Sapulpa, Ponca City and Bartlesville Chamber directories which are distributed throughout the community and to new residents and businesses.
- Purchased ad in Skiatook Lake and Attractions map - printed August 2021.
- The City of Ponca City includes CPTS and the local ride line in the weekly Media Tip Sheet, which is distributed to leaders and organizations throughout the community.
- Phone contact information is available in the Creek County Community Resources and Kay County Resource Guides.
- Bristow News and Sapulpa Herald publish information in Community Events section on a regular basis 2020, 2021 and 2022.
- Participated in Ponca City Library Resource Fair in September 2020 and 2021.
- Annual reports disseminated to stakeholders and partners, March 2021 and March 2022.
- CPTS info was published in the Vintage Guide to Housing and Services, Senior Resource Guide for 2021.
- Posted a Cimarron Transit program video on Kay County Website and agency website 2020, 2021 and 2022.
- Brochures were available and shared throughout the year.
- Team Radio published spots during May 2021, September 2021, December 2021 and April 2022.
- In February, staff mailed a letter, Title VI Notice and survey to known LEP individuals in. One survey was received reporting high satisfaction.

Service Area Map



Cimarron Public Transit System Complaint Form

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

If you feel that you have been discriminated against in the provision of transportation services, please provide the following information to assist us in processing your complaint. Should you require any assistance in completing this form or need information in alternate formats, please let us know.

Please mail or return this form to:

Cimarron Public Transit System
Laura Corff, Title VI Coordinator
501 Sixth Street, Pawnee, OK 74058
Email: lcorff@ucapinc.org FAX: 580-718-0981

PLEASE PRINT

1. Complainant's Name:		
a. Address:		
b. City:	State:	Zip Code:
c. Telephone (include area code): Home () or Cell () Work () -		
d. Electronic mail (e-mail) address:		
Do you prefer to be contacted by this e-mail address? () YES () NO		
2. Accessible Format Requirements? () YES specify: () NO		
3. Are you filing this complaint on your own behalf? () YES If YES, please go to question 7. () NO If no, please go to question 4		
4. If you answered NO to question 3 above, please provide your name and address.		
a. Name of Person Filing Complaint:		
b. Address:		
c. City:	State:	Zip code:
d. Telephone (include area code): Home () or Cell () () - () - Work		
e. Electronic mail (e-mail) address:		
Do you prefer to be contacted by this e-mail address? () YES () NO		
5. What is your relationship to the person for whom you are filing the complaint?		
Please explain why you have filed for a third party.		
6. Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party. () YES, I have permission. () NO, I do not have permission.		
7. I believe that the discrimination I experienced was based on (check all that apply): () Race () Color () National Origin (classes protected by Title VI) () Other (please specify)		
8. Date of Alleged Discrimination (Month, Day, Year):		
9. Where did the Alleged Discrimination take place?		

10. Explain as clearly as possible what happened and why you believe that you were discriminated against. Describe all of the persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known). <i>Use the back of this form or separate pages if additional space is required.</i>								
11. Please list any and all witnesses' names and phone numbers/contact information. <i>Use the back of this form or separate pages if additional space is required.</i>								
12. What type of corrective action would you like to see taken?								
13. Have you previously filed a Title VI complaint with any other Federal, State, or local agency, or with any Federal or State court? () YES If yes, check all that apply. () NO a. () Federal Agency (List agency's name) b. () Federal Court (Please provide location) c. () State Court d. () State Agency (Specify Agency) e. () County Court (Specify Court and County) f. () Local Agency (Specify Agency)								
14. If YES to question 14 above, please provide information about a contact person at the agency/court where the complaint was filed. <table style="width: 100%; border: none;"> <tr> <td style="width: 50%;">Name: _____</td> <td style="width: 50%;">Title: _____</td> </tr> <tr> <td>Agency: _____</td> <td>Telephone: () - </td> </tr> <tr> <td colspan="2">Address: _____</td> </tr> <tr> <td>City: _____</td> <td>State: _____ Zip Code: _____</td> </tr> </table>	Name: _____	Title: _____	Agency: _____	Telephone: () -	Address: _____		City: _____	State: _____ Zip Code: _____
Name: _____	Title: _____							
Agency: _____	Telephone: () -							
Address: _____								
City: _____	State: _____ Zip Code: _____							

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

Signature and date are required:

Signature	Date

If you completed Questions 4, 5 and 6, your signature and date is required:

Signature	Date

(Notice Posted at Transit Sites, agency website, Cimarron Transit vehicles and Program Brochures)

Notifying the Public of Rights Under Title VI

Cimarron Public Transit System hereby gives public notice of its policy to uphold and assure full compliance with Title VI of the Civil Rights Act of 1964 and all related statutes. Title VI and related statutes prohibiting discrimination in federally assisted programs require that no person in the United States of America shall, on the grounds of race, color, national origin, sex, age, or disability be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

Cimarron Public Transit System operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI may file a complaint with Cimarron Public Transit System. Any such complaint must be in writing and submitted to Cimarron Public Transit's Title VI Coordinator within 180 days following the date of the alleged occurrence. For more information regarding Cimarron Public Transit System's civil rights program, and the procedures to file a complaint, please contact: Cimarron Transit, Attention: Title VI Coordinator, 501 Sixth Street, Pawnee, OK 74058, 918-762-3041, Ext. 181 (TDD: 800-722-0353). For more information, visit <https://ucapinc.org/cpts>

A complainant may file a complaint directly with the Federal Transit Administration by filling a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor - TCR, 1200 New Jersey Avenue, SE, Washington, DC 20590/

A complainant may file a complaint directly with the Oklahoma Department of Transportation by filing a complaint with the Contract Compliance Division, Attention: Contract Compliance Division Manager, 200 NE 21st Street, Oklahoma City, 73105-3204.

If information is needed in another language, contact Title VI and LEP Program Coordinator at 918-762-3041, Ext. 181.

Notificacion al publico sobre los derechos en virtud del Titulo VI

•Cimarron Public Transit administra sus programas y servicios sin distincion de raza, color ni nacionalidad conforme al Titulo VI de la Ley de Derechos Civiles. Si considera que ha sido perjudicado a causa de algun acto discriminatorio ilegal en virtud del Titulo VI, puede presentar una demanda por escrito ante la 501 Sixth Street, Pawnee, OK 74058.

Si desea obtener la informacion en otro idioma, llame al 1-918-762-3041, Ext. 181.

YOUR RIGHTS UNDER TITLE VI OF THE CIVIL RIGHTS ACT OF 1964

"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." For further information or if you feel that you have been discriminated against, contact the Title VI Coordinator at 918-762-3041 Ext. 181.

Documenting Complaints, Investigations, and Lawsuits

Cimarron Public Transit System has not been involved in any transit-related Title VI investigations, complaints or lawsuits. Additionally, Cimarron Public Transit has not received any Title VI-related complaints.

Should the program receive a Title VI complaint, all Title VI complaints will be entered and tracked in Cimarron Public Transit System complaint log. Active investigations will be monitored for timely response on the part of all parties. The agency's Title VI Coordinator shall maintain the log.

Cimarron Public Transit System Title VI Complaints, Investigations, and Lawsuits Log

Date complaint filed	Complainant	Basis of complaint R-C-NO	Summary of allegation	Pending status of complaint	Actions taken	Closure Letter (CL)	Letter of Finding (LOF)	Date of CL or LOF
Investigations								
Lawsuits								
Complaints								

AUTHORIZING RESOLUTION

A RESOLUTION confirming the United Community Action Program, Inc. Board of Directors has reviewed and approved the Cimarron Public Transit Program Title VI Plan revision.

CERTIFICATE

The undersigned duly qualified and acting recording secretary of the United Community Action Program, Inc. certifies that the foregoing is a true and correct copy of a resolution, adopted at a legally convened meeting of the United Community Action Program, Inc. Board of Directors held on November 18, 2025.

Monica Sewell

Monica Sewell, Recording Secretary



OFFICIAL SEAL

11-18-25

Date

Acknowledgement of Cimarron Public Transit System Title VI Nondiscrimination and LEP Plan

I, _____, the undersigned, hereby acknowledge that I have received a copy of the Cimarron Public Transit System Title VI Nondiscrimination and Limited English Proficiency Plan for all transit employees. I understand that this plan has been adopted by the governing board of Cimarron Public Transit System.

I further understand that receipt of this plan constitutes a legal notification of the contents and that it is my responsibility to become familiar with and adhere to the provisions contained therein. I will seek and get clarification for any questions from management listed in the policy.

I further understand the information contained in the approved policy dated November 18, 2025, is subject to change, and that any such changes, or addendums, shall be provided to me.

A copy of this acknowledgement will be kept in my personnel policy.

Major changes to this revision include:

- Updated composition of the UCAP board of directors (page 5)
- Updated compositions of the senior advisory councils (page 13)
- The addition that claimants may file a complaint directly with ODOT in addition to CPTS and FTA (on page 20).

Employee Name Printed

Employee Signature

Date