



# STAFF REPORT

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<b>Meeting Type:</b>	City Council
<b>Meeting Date:</b>	September 15, 2025
<b>From:</b>	Andi Howell, Transit Director
<b>Subject:</b>	Resolution 2025-34: Updating the City of Sandy Transit Title VI Program

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## DECISION TO BE MADE:

Whether to update and revise the Sandy Transit Title VI Program.

## APPLICABLE COUNCIL GOAL:

- **Goal 4.1:** Continue to promote transit as a safe, efficient mode of transportation; Continue to increase ridership.

## BACKGROUND / CONTEXT:

Transit agencies are required by federal regulation (FTA Circular 4702.1B) and by the Oregon Department of Transportation (ODOT) Rail and Public Transit Division to draft and maintain a Title VI Program. These programs are updated every three years.

A Title VI Program "establishes guidelines to effectively monitor and ensure that City of Sandy Transit (known as Sandy Area Metro or SAM) is in compliance with all FTA Title VI requirements and regulations in order to carry out the provisions of the Department of Transportation's (DOT) Title VI Regulations at 49 CFR Part 21".

SAM Title VI Program creates policy to ensure that all Sandy Transit programs and services remain free of forms of discrimination. To ensure compliance SAM notifies beneficiaries of protections under Title VI through postings on the Transit web page, all transit bus schedules and all buses; maintains procedures for investigating and tracking Title VI complaints, records all Title VI investigations, complaints and lawsuits; provides meaningful access to Limited English Proficient (LEP) persons; provides additional information upon requests at the discretion of FTA; and prepares and submits a Title VI Program.

To date, Sandy Transit has never had a civil rights complaint. The Transit program closely monitors the Sandy community using American Community Survey (ACS) data and annual on-board surveys to understand community and rider demographics to meet any needs that arise, such as the need for signage to be in a language other than English. This 2025 Title VI Program has the most recent, updated ACS data compared to the plan approved by resolution in 2021.

Another key update in this Title VI Plan is the revision of the Title VI Non-Discrimination Policy Statement. For reference, the 2021 Non-Discrimination Policy Statement read:

*City of Sandy Transit, under Title VI of the Civil Rights Act of 1964 and related statutes, ensures that no person in the City of Sandy, on the grounds of race, color, national origin, gender, disability, religion, sexual orientation, age, marital status or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity it administers.”*

*For information or guidance on how to file a complaint based on the grounds of race, color, national origin, gender, disability, religion, sexual orientation, age, marital status or disability please visit the following web page:*

*[http://www.oregon.gov/ODOT/CS/CIVILRIGHTS/Pages/tvi\\_disc\\_comp.aspx](http://www.oregon.gov/ODOT/CS/CIVILRIGHTS/Pages/tvi_disc_comp.aspx)*

Title VI of the Civil Rights Act of 1964 and related statutes ensure that no person is excluded based on the grounds of race, color or national origin. Although the City may choose non-discrimination based on gender, disability, religion, sexual orientation, age, marital status or disability, it is not required under Title VI of the Civil Rights Act of 1964 and therefore has been removed from SAM's Title VI Non-Discrimination Program and Policy Statement.

#### **KEY CONSIDERATIONS / ANALYSIS:**

A primary change to this Title VI Plan is updated census data and the removal of gender, disability, religion, sexual orientation, age, marital status or disability from the Title VI Non-Discrimination Policy Statement as these are not a requirement under Title VI of the Civil Rights Act of 1964. Non-discrimination against persons living with a disability, for example, is ensured under the American Disabilities Act (ADA), not Title VI of the Civil Rights Act. Therefore, it has been removed from this policy statement but remains in the Sandy Transit's ADA Plan.

#### **BUDGET IMPACT:**

None.

#### **RECOMMENDATION:**

Adopt Resolution 2025-34 to update and revise the Sandy Transit Title VI Program.

#### **SUGGESTED MOTION LANGUAGE:**

"I move to adopt Resolution 2025-34."

#### **LIST OF ATTACHMENTS / EXHIBITS:**

- Resolution 2025-34
  - Title VI Program