Title VI Plan

For the Federal Transit Administration,
Washington State Department of Transportation, Idaho Transportation Department

May 1, 2019—May 1, 2022
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Introduction

The Council on Aging & Human Services/COAST Transportation will not discriminate on the basis of race, sex, sexual orientation, gender identity/expression, religion, age, color, creed, national or ethnic origin, physical, mental or sensory ability, marital status, genetic information, and/or status as a veteran.

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

COAST is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.A. COAST is also committed to protecting all classes listed in its general agency Non-Discrimination Statement from benefits of services.

NOTICE TO PUBLIC: COAST posts its Title VI notice at its administrative office in Colfax and on its website, coacolfax.org.

**TITLE VI COMPLAINT PROCEDURES**

Anyone who believes they have been subjected to discrimination under Title VI, may file a complaint.

**How to file a Title VI complaint**

A signed, written complaint may be filed up to one hundred and eighty (180) days from the date of alleged discrimination. The complaint should include the following information:

- Complainant’s name, mailing address, and how to be contacted (i.e., telephone number, email address, etc.)
- How, when, where and why a person believes they were discriminated against. This should include the location, names and contact information of any witnesses.
- Other information that is deemed significant.

A form is available at: COAST/Council on Aging & Human Services
S. 210 Main St.
Colfax, WA 99111

The complaint may be filed in writing with the Title VI Coordinator, at the above address.

**NOTE:** COAST encourages all complainants to certify all mail that is sent through the U.S. Postal Service and/or ensure that all written correspondence can be tracked easily. For complaints originally submitted by facsimile, an original, signed copy of the
complaint must be mailed to the Title VI Coordinator as soon as possible, but no later than 180 days from the alleged date of discrimination.

What happens to a complaint after it is submitted to COAST?

All complaints alleging discrimination based on race, color or national origin in a service or benefit provided by COAST will be directly addressed by the Title VI Coordinator. The Coordinator will also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. Additionally, COAST shall make every effort to address all complaints in an expeditious and thorough manner.

In instances where additional information is needed for investigation of the complaint, COAST will contact the complainant in whatever manner is most appropriate for the complainant to obtain this additional information.

Once sufficient information for investigating the complaint is received by the Coordinator, COAST will respond, in writing, to the complainant within 10 working days.

How a person will be notified of the outcome of a complaint

COAST will communicate with the complainant in writing and may, upon discussion with the complainant, also utilize email, telephone, or fax. COAST will advise the complainant of their right to 1) appeal (provide dates, etc) and/or 2) file a complaint externally with the U.S. Department of Transportation and/or the Federal Transit Administration. Every effort will be made to respond to Title VI complaints within ten working days of receipt of such complaints, if not sooner.

In addition to the complaint process described above, a complainant may file a Title VI complaint with the following offices:

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

INVESTIGATIONS,
COMPLAINTS OR LAWSUITS

None as of October 15, 2019.
LIMITED ENGLISH PROFICIENCY (LEP) PLAN

Justification

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., and its implementing regulations provide that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance. The Supreme Court, in Lau v. Nichols, 414 U.S. 563 (1974), interpreted Title VI regulations promulgated by the former Department of Health, Education, and Welfare to hold that Title VI prohibits conduct that has a disproportionate effect on LEP persons because such conduct constitutes national origin discrimination. Providing public transportation access to LEP persons is crucial. An LEP person’s inability to effectively utilize public transportation may adversely affect his or her ability to obtain health care, education, or access to employment.

1. **Determine the number of LEP persons eligible to be served or likely to be encountered by a program, activity or service.** The number of requests for COAST’s services by LEP individuals is unpredictable and infrequent, as determined by agency statistics and supported by U.S. Census data.

(See Attachment ‘C’)

2. **Determine the frequency with which LEP persons come into contact with our program.** COAST participated in public meetings as part of its grant application review process and no comments were received about LEP services. COAST consulted program staff about LEP contacts and found them to be rare.

3. **Determine the importance of the program, activity or service to people’s lives.** Transportation for persons in rural areas to access medical and other services available in their community or only available in distant communities can be critical for mobility disadvantaged people. COAST provides the only public transportation service for most of the geographic areas of S.E. Washington and North-Central Idaho. However, the number of LEP persons living in the service area who are also transportation disadvantaged appears to be small considering the low number of contacts COAST has had from LEP persons and the low numbers of LEP persons living in the area according to census figures.

4. **Determine the resources available and cost.** Potential clients contact COAST primarily by telephone at 509-397-2935, but also by email or in person. Persons making contact who request language assistance will be served through this plan.

COAST will:
• Utilize staff communication skills in working with second language individuals to effectively serve clients.

• Use a commercial telephonic interpretation service to obtain immediate interpreter services. Currently, the contracted service is *CTS Language Link*.

• Utilize an interpreter brokerage to obtain a trained interpreter for telephone or personal contact with LEP clients. (Also, *CTS Language Link*)

For the benefit of LEP persons, COAST will utilize its agency website and its contacts through clubs, municipal organizations, local governments, senior centers, and other community groups to promote services. This outreach could increase the frequency of requests made for COAST services, in general, and by LEP persons, specifically. A partial list of partner agencies and groups with whom COAST interacts is contained in Attachment ‘D’. Through these groups, COAST is able to reach out to all constituencies, including potential LEP clients.

**Staff Training**

Staff members will know their obligations to provide meaningful access to information and services for LEP persons and all employees in public contact positions will be properly trained. Training will ensure that:

• Staff knows about LEP policies and procedures. (Signature page in employee file)

• Staff having contact with the public is trained to work effectively with in-person and telephone interpreters.

This training is included as part of the orientation for new employees.

**Monitoring and Updating the Plan**

Monitoring will be continuous and services will be re-evaluated if the frequency of requests and/or the potential or actual LEP population changes.

In 2017, COAST added parts of Spokane County into its service area. To meet potential needs of this added population, COAST/COAHS has adopted demographic data from the Spokane Transit Authority’s LEP Plan. The new data is inclusive of three identified Safe Harbor Languages, Russian, Spanish and Vietnamese as languages with limited English proficiency.

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

1. The COAST website includes the Title VI policy, Complaint policy, and complaint form. The website also states:
COAST does not discriminate on the basis of race, color or national origin. 
COAST no discrimina en base de raza, color o origen nacional.

2. COAST’s Title VI policy and complaint form are also available at our office in Colfax, S210 Main St. Individuals who believe they have been discriminated against may request a complaint form from the staff at the Colfax office or by email: cvantinecoast@gmail.com or regular mail: COAST, S. 210 Main St., Colfax, WA 99111, by fax at 509-397-9229, or by telephone at 509-397-2935.

ANALYSIS OF CONSTRUCTION PROJECTS

COAST has not constructed a facility such as a vehicle storage facility, maintenance facility, or operations center that would require a Title VI Equity Analysis.

INCLUSIVE PUBLIC PARTICIPATION

Community Outreach is a requirement of Title VI. Recipients and sub-recipients shall seek out and consider the viewpoints of minority and low-income populations in the course of conducting public outreach. Recipients have wide latitude to determine what specific measures are most appropriate and should make this determination based on the composition of the affected population, the public involvement process, and the resources of COAST.

COAST has engaged the public in its planning and decision-making processes, as well as its marketing and outreach activities. COAST has utilized a comprehensive Public Participation process that outlines the goals and objectives for public participation:

- Transit Development Plan (TDP). The Transit Development Plan is a requirement of the Washington State Legislature. The Plan is prepared by the independent transit properties and submitted WSDOT. A summary document is prepared which shows the size of the fleet, costs, revenue, service revenue hours, revenue miles, expense and capital expenditures. Public hearings are held to obtain comments from the public on the TDP.

- Transit Improvement Plan (TIP). Another document called the Transit Improvement Plan is prepared and used by the cities and counties. The TIP is a planning document that only addresses capital projects and improvement projects in cities and counties. All TIPs from local jurisdictions (counties and cities) as well as the transits feed into a Regional TIP which is required by the federal government. If an item we wish to purchase is not in the TIP, it cannot be funded. TIP is only for capital projects and represents the capital section of the Transit Development Plan. Although TIP is a federal requirement, it goes
through the region and the state. Public hearings are held to obtain comments from the public on the TIP.

- **Board Meetings.** Board meetings for the Council on Aging & Human Services, COAST’s governing agency, are held on the third Tuesday of every month. The public is welcome to attend. Details regarding dates, times, and locations for these meetings are located on the agency website, coacolfax.org, or by contacting the Colfax office at 509-397-2935. Board policies, meeting minutes, and other information is also available.

- **Public Meetings.** COAST participates in public meetings in concert with its funding agencies, community partners, and regional transportation development agencies. For example, the Palouse Regional Transportation Planning Organization (PRTPO) conducts a number of public input meetings in the course of developing TDPs, TIPs, and other Washington State required transportation documents. Attachment D lists many of the organizations and cooperatives with which COAST and the Council on Aging & Human Services participate to promote services, gather input, and improve access for the communities served.

- **Major Service Change.** Any major changes in service or organization changes are communicated through the Board of Directors and through press releases or information available on the agency website: coacolfax.org

- **Customer Complaint Process.** Information on the customer complaint process, similar to the Title VI complaint process, is available on our website, coacolfax.org, or by calling, visiting, or writing the Colfax office:
  
  COAST
  
  S. 210 Main St.
  
  Colfax, WA 99111
  
  509-397-2935

- **General Awareness.** Promotional materials highlighting available transportation services and needs are posted throughout the service area and available on the agency website: coacolfax.org

- **Board Membership.** When making future appointments, ethnic diversity will be of prime importance as the COA Human Services’ Board of Directors grows and evolves. Public notices and press releases will be used to advertise throughout the COAST service area to encourage interested persons of all ethnic and social backgrounds to apply for a vacancy on the Board.

Current Board Membership:

- 11 Total Members
- 64% male, 36% female
- 100% white, non-Hispanic

**ATTACHMENT ‘A’**
In accordance with Title VI of the Civil Rights Act of 1964, the Council on Aging & Human Services, including COAST Transportation, does not discriminate on the basis of race, color, or national origin. For more information on your rights or the procedures to file a discrimination complaint, or to request this information in an accessible format, please contact COAHS/COAST by phone at 509-397-2935 or in person at COA’s Administrative Office, 210 S. Main St., Colfax, WA 99111.

- If information is needed in another language, contact (509) 397-2935.
- Si necesita información en otro idioma, comuníquese al (509) 397-2935.
- Для получения информации на другом языке звоните по тел. (509) 397-2935.
- Nếu quý vị cần thông tin bằng một ngôn ngữ khác, xin vui lòng gọi số (509) 397-2935.
- 如果需要此信息的其他语言版本，请致电 (509)-397-2935
TITLE VI COMPLAINT FORM

Title VI of the 1964 Civil Rights Act requires that "No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance."

If you feel you have been discriminated against in transportation services, please provide the following information in order to assist us in processing your complaint and send it to: (You may also fax, email, or call-in your complaint, if that is more convenient)

COAST Transportation
P.O. Box 107, S. 210 Main St.
Colfax, WA 99111
509-397-2935, 509-397-9229 fax
costcolfax@gmail.com email  coacolfax.org website

Please print clearly and use additional paper, if needed:

Name:

Address:

City, State, Zip Code:

Telephone Number:__________(home)____________(cell)____________(message)

Person discriminated against: ____________________________________________

Address of person discriminated against:____________________________________

__________________________________________

Please indicate why you believe the discrimination occurred:

______race or color
______national origin
______other (explain in description of circumstances)
What was the date the alleged discrimination take place?

_____________________________________________________

Where did the alleged discrimination take place?

_____________________________________________________

Please describe the circumstances as you saw it: (use additional pages if necc.)

_____________________________________________________

_____________________________________________________

_____________________________________________________

_____________________________________________________

_____________________________________________________

_____________________________________________________

_____________________________________________________

Please list any and all witnesses’ names and phone numbers:

_____________________________________________________

_____________________________________________________

_____________________________________________________

_____________________________________________________

_____________________________________________________

What type of corrective action would you like to see taken?

_____________________________________________________

_____________________________________________________

_____________________________________________________

Please attach any documents you have which support the allegation. Then date and sign this form and send to the Title VI Coordinator at the address listed on page 1 of this document.

_____________________________________________________

Your signature

Print your name

Date
<table>
<thead>
<tr>
<th>Idaho Counties</th>
<th>Nez Perce</th>
<th>Lewis</th>
<th>Latah</th>
</tr>
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<tbody>
<tr>
<td>Total Population</td>
<td>37,409</td>
<td>100%</td>
<td>3,615</td>
</tr>
<tr>
<td>Speak English Only</td>
<td>36,018</td>
<td>96%</td>
<td>3,514</td>
</tr>
<tr>
<td>Speak Spanish Less than Very Well</td>
<td>54</td>
<td>0.1%</td>
<td>23</td>
</tr>
<tr>
<td>Speak Russian Less than Very Well</td>
<td>7</td>
<td>0.0%</td>
<td>0</td>
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<tr>
<td>Speak Vietnamese Less than Very Well</td>
<td>0</td>
<td>0.0%</td>
<td>0</td>
</tr>
<tr>
<td>Speak Chinese Less than Very Well</td>
<td>68</td>
<td>0.2%</td>
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<th>Garfield</th>
<th>Asotin</th>
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<tr>
<td>Total Population</td>
<td>451,005</td>
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<td>2,083</td>
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<tr>
<td>Speak English Only</td>
<td>415,680</td>
<td>92%</td>
<td>2,027</td>
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<tr>
<td>Speak Spanish Less than Very Well</td>
<td>2,630</td>
<td>0.6%</td>
<td>2</td>
</tr>
<tr>
<td>Speak Russian Less than Very Well</td>
<td>3,770</td>
<td>0.8%</td>
<td>0</td>
</tr>
<tr>
<td>Speak Vietnamese Less than Very Well</td>
<td>1,295</td>
<td>0.3%</td>
<td>0</td>
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<tr>
<td>Speak Chinese Less than Very Well</td>
<td>671</td>
<td>0.1%</td>
<td>0</td>
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<th>Idaho Counties</th>
<th>Idaho</th>
<th>Clearwater</th>
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<tr>
<td>Total Population</td>
<td>15,482</td>
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<tr>
<td>Speak English Only</td>
<td>15,116</td>
<td>98%</td>
</tr>
<tr>
<td>Speak Spanish Less than Very Well</td>
<td>53</td>
<td>0%</td>
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<tr>
<td>Speak Russian Less than Very Well</td>
<td>0</td>
<td>0%</td>
</tr>
<tr>
<td>Speak Vietnamese Less than Very Well</td>
<td>0</td>
<td>0%</td>
</tr>
<tr>
<td>Speak Chinese Less than Very Well</td>
<td>0</td>
<td>0%</td>
</tr>
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<table>
<thead>
<tr>
<th>Washington Counties</th>
<th>Whitman</th>
</tr>
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<tbody>
<tr>
<td>Total Population</td>
<td>44,720</td>
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<tr>
<td>Speak English Only</td>
<td>38,826</td>
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<tr>
<td>Speak Spanish Less than Very Well</td>
<td>271</td>
</tr>
<tr>
<td>Speak Russian Less than Very Well</td>
<td>12</td>
</tr>
<tr>
<td>Speak Vietnamese Less than Very Well</td>
<td>60</td>
</tr>
<tr>
<td>Speak Chinese Less than Very Well</td>
<td>1,021</td>
</tr>
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</table>
ATTACHMENT ‘D’

Community Involvement through these partners: (not comprehensive)

- Palouse Regional Transportation Planning Organization (PRTPO)
- Spokane Regional Transportation (SRT)
- Catholic Charities
- Aging & Long-Term Care of Eastern Washington (ALTCEW)
- Lewis & Clark Valley Metropolitan Planning Organization (LCVMPO)
- Spokane Transportation Cooperative
- Innovia Foundation Community Needs Development
- Whitman County Local Emergency Planning Council
- Disability Action Center (DAC)
- Orofino Senior Center
- Asotin County Transit
- WSU Center for Civic Engagement
- Whitman County Health Network
- Palouse Alliance
- Idaho Community Action Partnership/Area Agency on Aging
- Gritman Memorial Hospital
- Lewiston Transit
- Grangeville Senior Center
- Schweitzer Engineering Community Outreach
- Senior meal sites throughout Eastern WA and North Central ID
- Latah County Library System
- Pullman Regional Hospital
- Whitman County Library System
- Garfield County Public Transportation
- St. Joseph Regional Hospital
- Whitman County Food Coalition
- Food Pantries and in Colfax and Pullman
- Community Action Center
- Clearwater Valley Hospitals
- Boost Collaborative
- Whitman Hospital and Medical Center
- Community Childcare Center
- Department of Human Services, Colfax and Lewiston Offices
- Paul’s Place Assisted Living
- Hill-Ray Senior Living
- Whitman Health and Rehabilitation Center
- Palouse River Counseling
- Pullman Senior Center
- Palouse Empire Fair
- Syringa Hospital
- Spokane Transit Authority