



## **TITLE VI PLAN**

**FOR THE FEDERAL TRANSIT ADMINISTRATION,  
WASHINGTON STATE DEPARTMENT OF  
TRANSPORTATION, IDAHO TRANSPORTATION  
DEPARTMENT**

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**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](http://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, 5<sup>th</sup> Floor - TCR  
1200 New Jersey Ave., SE  
Washington, DC 20590

<b>INVESTIGATIONS, COMPLAINTS OR LAWSUITS</b>
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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](mailto: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](http://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](http://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](http://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](http://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*  
coastcolfax@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?

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Where did the alleged discrimination take place?

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

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

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

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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

ATTACHMENT 'C'

	Nez Perce		Lewis		Latah	
Idaho Counties	Population	Percent	Population	Percent	Population	Percent
Total Population	37,409	100%	3,615	100%	36,152	100%
Speak English Only	36,018	96%	3,514	97%	33,913	94%
Speak Spanish Less than Very Well	54	0.1%	23	0.6%	121	0.3%
Speak Russian Less than Very Well	7	0.0%	0	0%	0	0.0%
Speak Vietnamese Less than Very Well	0	0.0%	0	0%	0	0.0%
Speak Chinese Less than Very Well	68	0.2%	0	0%	343	0.9%
	Spokane		Garfield		Asotin	
Washington Counties	Population	Percent	Population	Percent	Population	Percent
Total Population	451,005	100%	2,083	100%	20,807	100%
Speak English Only	415,680	92%	2,027	97%	20,071	96%
Speak Spanish Less than Very Well	2,630	0.6%	2	0.1%	69	0.3%
Speak Russian Less than Very Well	3,770	0.8%	0	0%	24	0.1%
Speak Vietnamese Less than Very Well	1,295	0.3%	0	0%	0	0.0%
Speak Chinese Less than Very Well	671	0.1%	0	0%	0	0.0%

	Idaho		Clearwater	
Idaho Counties	Population	Percent	Population	Percent
Total Population	15,482	100%	8,262	100%
Speak English Only	15,116	98%	7,863	95%
Speak Spanish Less than Very Well	53	0%	57	1%
Speak Russian Less than Very Well	0	0%	0	0%
Speak Vietnamese Less than Very Well	0	0%	0	0%
Speak Chinese Less than Very Well	0	0%	0	0%

	Whitman	
Washington Counties	Population	Percent
Total Population	44,720	100%
Speak English Only	38,826	87%
Speak Spanish Less than Very Well	271	1%
Speak Russian Less than Very Well	12	0%
Speak Vietnamese Less than Very Well	60	0%
Speak Chinese Less than Very Well	1,021	2%

## 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