



TITLE VI PLAN
FOR THE FEDERAL TRANSIT ADMINISTRATION
AND WASHINGTON STATE DEPARTMENT OF
TRANSPORTATION

2017 – 2020

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Introduction

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. Columbia County Public Transportation 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.B If you believe you have been subjected to discrimination under Title VI, you may file a complaint.

TITLE VI COMPLAINT PROCEDURES

How to file a Title VI Complaint

You may file a signed, written complaint up to one hundred and eighty (180) days from the date the complainant became aware of the incident. The complaint should include the following information:

- Your name, mailing address, and how to contact you (i.e., telephone number, email address, etc.)
- How, when, where and why you believe you were discriminated against. Include the location, names and contact information of any witnesses.
- Other information that you deem significant

A form is available at: **Columbia County Public Transportation, 507 West Cameron, Dayton Washington (509) 382-1647**

The complaint may also be filed in writing with General Manager at the following address:

507 West Cameron St.
Dayton, Washington

NOTE: Columbia County Public Transportation 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 date the complainant became aware of the incident.

What happens to your complaint after it is submitted?

All complaints alleging discrimination based on race, color or national origin in a service or benefit provided by Columbia County Public Transportation will be directly

addressed by Columbia County Public Transportation. Columbia County Public Transportation shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. Additionally, Columbia County Public Transportation 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, Columbia County Public Transportation will in writing ask for additional information that will help in the investigation of the complaint.

Once sufficient information for investigating the complaint is received by Columbia County Public Transportation, a written response will be drafted subject to review by the transit's attorney. If appropriate, The Columbia County Public Transportation attorney may administratively close the complaint. In this case, The Columbia County Public Transportation will notify the complainant of the action as soon as possible.

How you will I be notified of the outcome of your complaint

Columbia County Public Transportation will send a final written response letter by the transit's attorney and advise you (complainant) of your right to 1) appeal within seven calendar days of receipt of the final written decision to the Board of The Columbia County Public Transportation 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 seven 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:

Washington State Department of Transportation
Public Transportation Division
Attn: Title VI Coordinator
PO Box 47387
Olympia, WA 98504-7387

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

United States Department of Justice
Civil Rights Division
Coordination and Review Section - NWB
950 Pennsylvania Avenue NW
Washington DC, 20530

RECORD OF TITLE VI OR OTHER CIVIL RIGHTS

INVESTIGATIONS, COMPLAINTS OR LAWSUITS

To date, there have been no Title VI investigations, complaints or lawsuits.

LIMITED ENGLISH PROFICIENCY (LEP) PLAN

Columbia County Public Transportation is committed to breaking down language barriers by implementing consistent standards of language assistance across its service area.

Census. The United States is home to millions of national origin minority individuals who are Limited English Proficiency (LEP). That is, their primary language is not English and they cannot speak, read, write or understand the English language at a level that permits them to interact effectively with recipients of Federal financial assistance.

Because of language differences and the inability to effectively speak or understand English, persons with LEP may be subject to exclusion from programs or activities, experience delays or denials of services. These individuals may be entitled to language assistance with respect to a particular type of service. The federal

government and those receiving assistance from the federal government must take reasonable steps to ensure that LEP persons have meaningful access to the programs, services, and information those entities provide. This will require agencies to establish creative solutions to address the needs of this ever-growing population of individuals, for whom English is not their primary language.

According to the 2015 Census Data for Columbia County, English is spoken by 93.8% of Columbia County.

Spanish speaking in the household represents 6.9% of the non-English speaking in Columbia County.

ANALYSIS OF FACTORS

Factor No. 1: The number or proportion of LEP persons in the service area.

The majority of the population with which we do business with are proficient in English, so that LEP services are not normally required. No information was available regarding the percentage of bilingual residents of the county.

Factor No. 2. The frequency with which LEP individuals come into contact with the service.

(All) contacts with Columbia County Public Transportation are made through our dispatching services. We serve LEP persons via our on demand response services.

The Guest Services Representatives speak and translate in person or over the phone a total of approximately one to two times a year.

Factor No. 3: The nature and importance of service provided by Columbia County Public Transportation.

Columbia County Public Transportation provides important transit services to the public through our on call demand services. Our system is a demand response service which means that customers call in to us and we provide transportation to and from the destination that they request.

Factor No. 4. The resources available to the recipient of the federal funds to assure meaningful access to the service by LEP persons.

Columbia County Public Transportation current in-house language capabilities are Spanish. Experienced staff is fluent in Spanish. We also have 2 bilingual (Spanish) passengers and one day care owner who will serve as interpreters as needed on those occasions when a person with limited English proficiency contacts the transit system. If the language is something other than Spanish the following guidelines will be followed:

1. The Columbia County Public Transportation will have the Census Bureau’s “I Speak Cards” available at the Columbia County Public Transportation operations building. Although staff may not be able to provide immediate translation assistance, we will utilize the cards to identify language needs.
2. If an interpreter is needed immediately, in person or on the telephone, staff will use the “I Speak Cards” to help determine what language assistance is needed. Staff shall then contact www.language.com for assistance. On the Language Line webpage, staff will select the Need an Interpreter Now link and follow the directions to receive an access code.
3. The Columbia County Public Transportation will add to our webpage the Title VI Policy and Complaint Procedures.
4. The Columbia County Public Transportation will educate our staff on the following procedures.
 - a. Understanding the Title VI Policy and LEP responsibilities.
 - b. How to access language assistant services via www.language.com
 - c. Document language assistance requests
 - d. The procedure if a Title VI and or LEP complaint is filed.

IMPLEMENTATION PLAN

Columbia County Public Transportation currently has implemented its plan and will review it annually, including any contacts with the LEP persons to determine the frequency of contacts, the language used, and how the contacts were handled.

We identify LEP persons in the service area by:

1. Those LEP persons that make contact with us.

2. Community organizations such as Project Timothy, The Catholic Church and other bilingual riders.
3. Columbia County Public Transportation has engaged the public in its planning and decision making processes, as well as its marketing and outreach activities.

In order to comply with 49 CFR 21.9(d), Columbia County Public Transportation and its sub-recipients must provide information to beneficiaries regarding their Title VI obligations and inform beneficiaries of the protections against discrimination afforded them by Title VI. Columbia County Public Transportation has established a statement of rights and a policy statement.

NOTIFYING BENEFICIARIES OF THEIR RIGHTS UNDER TITLE VI

Columbia County Public Transportation has a web site www.ccptransit.org on that web site its states that Columbia County Public Transportation does not discriminate on the basis of race, color or national origin.

A copy of the Columbia County Public Transportation's Title VI Policy and Complaint Form is also available at our administrative office located at:

507 West Cameron Street
Dayton, Washington 99328

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 Columbia County Public Transportation. Columbia County Public Transportation has engaged the public in its planning and decision-making processes, as well as its marketing and outreach activities.

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 turned into the State DOT. 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 it is 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 are held every two months on the 4th Tuesday of the month. The meetings are posted on our web site www.ccptransit.org, advertised in the local newspaper and posted at our administration offices located at 507 Cameron Street, Dayton Washington.

Public Meetings.

Public meetings are held when necessary and are advertised in the local newspaper, on our web site www.ccptransit.org and posted at our administration offices located at 507 Cameron Street, Dayton Washington

Major Service Change.

Same as Public meetings

Fare Increase.

Same as Public meetings

Staff Training.

Columbia County Public Transportation's staff has experience communicating in an ethnically diverse environment. A number come to the job with multi-lingual skills. Agency training and internal planning will continue to note the need to consider persons with limited English proficiency in communicating transportation information, and providing or partnering for language assistance for LEP persons to support and encourage their participation in the planning activities.

Given the proliferation of smart phone and expansion of Internet access, even among low-income populations, Columbia County Public Transportation is also exploring the potential to use more online community education and engagement tools that allow people to participate in the planning process without having to physically attend workshops or meetings, and whether those tools can be cost-effectively translated to Spanish or other non-English languages

Customer Complaint Process.

Statement of Policy: No person shall, on the grounds of race, color, or national origin, be denied from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any Columbia County Public Transportation program or activity, as provided by Title VI of the Civil Rights Act of 1964 and as amended, and the Civil Rights Restoration Act of 1987 (P.L. 100.250). Columbia County Public Transportation operates its programs without regard to race, color, or national origin.

Notices: Notices of Title VI rights are posted on the agency's website at: www.ccptransit.org and at the customer service disk.

How to file a Complaint: Any person or entity may make a complaint for discrimination on the basis of race, color, or national origin, by submitting a complaint within 180 days of the alleged discriminatory act as follows:

- a. All complaints must be in writing.
- b. A complaint may be made on the Agency's Title VI Complaint Form or by email or letter with the following information:
 1. If submitting a complaint by letter, and not using the Agency's form, all complaints must include:
 - I. Name, address, and telephone number of complaining party;
 - II. Name, address of the person, agency, institute, or office alleged to have engaged in a discriminatory act;
 - III. A description on how, why and when the discrimination occurred, including as much background as possible about the allegations; and
 - IV. A signature by the complaining party.
 2. A complaint submitted by letter should be addressed as follows;
Columbia County Public Transportation
Attention: General Manager
507 Cameron Street
Dayton, Washington 99328

3. A copy of the Agency's Title VI Complaint Form may be obtained as follows:
 - I. Website at www.ccptransit.org
 - II. Email request for Form to info@ccptransit.org
 - III. Call 509 382 1647 and ask for a customer service representative or the General Manager who will email or mail you a copy of the Form.
- c. A Title VI complaint may also be filed with an external entity such as the Federal Transit Administration (FTA), other federal or state agency, or a federal or state court. Information on how to file a complaint with the FTA may be found at: <http://www.fta.dot.gov/civilrights/12884.html> Should a complaint be filed with Columbia County Public Transportation and an external entity simultaneously, the external complaint will supersede the Columbia County Public Transportation complaint and Columbia County Public Transportation's complaint procedures will be suspended pending the external entity's findings.

4. How Columbia County Public Transportation Will Respond to Complaints

Once a Title VI Complaint is received by Columbia County Public Transportation, the General Manager will review the complaint and within fifteen working days, send a letter to the complainant acknowledging their complaint and either commencing an investigation or closing the matter.

Columbia County Public Transportation will investigate any written Title VI complaint filed within 180 days of the alleged discriminatory act alleging discrimination because of race, color, or national origin. Columbia County Public Transportation will make every effort to investigate a complaint within 60 days. If a complaint is not brought within this time frame or does not allege discrimination on the basis of race, color, or national origin, Columbia County Public Transportation will advise the complaining party that the Agency will close the complaint.

In investigation or attempting to resolve the complaint, the General Manager may contact the complainant for a meeting, interview or additional information. Please note that a complainants' failure to provide the requested information or participate in a meeting or interview (or failure to provide contact information) will result in the administrative closure of the complaint. The complainant has ten (10) business days from the date of any request by the General Manager to provide the requested information or to participate in the investigation. If the requested information is not received within that time frame, the case will be closed.

After the investigation is completed, the General Manager will issue a written report summarizing the investigation and will make findings and recommendations for corrective action, if any and as appropriate. Issuance of this report will also close the complaint and investigation.

Anyone wishing to appeal the findings, conclusions, or recommendations in the General Managers report may do so by submitting a letter explaining the complainant's position and requesting an independent review by Columbia County Public Transportation within 15 day of receipt of the report. The General Manager will issue a letter either confirming the findings or notifying the complainant of further

investigation within 30 business days of receipt of the appeal. The General Managers review is final and binding.

5. Complaint Records:

Records of all Title VI complaints and associated investigations are retained by Columbia County Public Transportation, subject to applicable retention policies and public disclosure requirements and or exemptions.

6. Non-Retaliation:

No person or entity will suffer retaliation or reprisal by Columbia County Public Transportation as a result of filing a Title VI discrimination complaint or as a result of participation in an investigation of a complaint. Any person who believes that they have suffered retaliation as a result of making a Title VI complaint or participating in any such investigation may make a complaint in accord with this process.

7. General Awareness and Phone Surveys.

Columbia County Public Transportation conducts bilingual (English and Spanish) on-board rider and general awareness surveys in conjunction with updates to the Transit Improvement Plan. These personal one-on-one surveys allow riders to convey any concerns or comments they have regarding services.

8. Bilingual Outreach.

Columbia County Public Transportation provides Spanish speaking clients with bilingual information on public transit services. Staff assistance is utilized in outreach programs and offered for programs and public meetings.

Community Events: Columbia County Public Transportation participates in community or civic events, as appropriate, to raise awareness of its Demand Response services.

Senior Center: Columbia County Public Transportation participates in senior center events, as appropriate, to ensure participants are aware of our Demand Response services.