

I. RiverCities Transit Title VI Policy Statement

RiverCities Transit (RCT) is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended. RiverCities Transit's objectives are to:

- Ensure that 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 human health and environmental effects, including social and economic effects of programs and activities on minority populations and low-income populations.
- Promote the full and fair participation of all affected 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).

II. Inclusive Public Participation Practices

RiverCities Transit's public communications are in general targeted to a broad social, ethnic, age and economic spectrum that make up the population of our service area. RiverCities Transit routinely uses a variety of communication tools a) that include a direct reference to the agency's adherence to Title VI requirements; and b) that by their nature and means of dissemination are intended not only to reach a broad social and economic spectrum of our service area population and the market place for vendor product and services, but also are tools which are intentionally non-exclusionary in any way. Agency communication tools that serve the purpose maximizing public engagement include the following:

A. Non-website Communication Tools that Foster Public Participation

Examples of relevant, specific non-website communication tools that encourage broad spectrum public participation and identify participation opportunities include the following:

- RiverCities Transit's System Map & Schedule available on buses, at Passenger Service Center, Longview City Hall, Kelso City Hall, Lower Columbia College Student Center, and Longview Library.
- RiverCities Transit Rider Updates and Alerts available on buses, at Customer Service, or by phone at 360-442-5663.
- Customer Comment Opportunities include customer comment cards, in-person opportunities at the Transfer Center Passenger Service office, RCT business office, online, by phone, and through email.

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- Opportunities for participation in the public comment process in 2013 related to the Comprehensive ADA Plan and Fixed-Route Service Expansion undertaken by RCT are examples where this channel of communication was used in the dissemination of information (fliers, bulletins, phone contact info, etc.). A copy is provided in this document's *Appendix B – Sample of Communication Tools*.

In addition to RCT encouraging public participation through a variety of communication tools, the LEP section of this program document speaks to other RCT efforts to identify and encourage public participation while being sensitive to environmental justice issues.

Having not yet met the required threshold of 1,000 people or greater than five (5) percent limited English proficiency population in the service area, RCT does not routinely provide non-English translations of publications and notices. RCT can make literature available in Spanish upon request.

III. Procurement and Project Management

RiverCities Transit includes standard non-discrimination clauses in all contracts and procurement solicitations. In programming federal funds for award in FTA's TEAM system, RiverCities Transit works closely with FTA Region 10 to ensure that any project related environmental issues are identified. RCT has most recently programmed federal funding for bus procurements. In this project, RCT identified whether SEPA and/or NEPA pertains. To date, all RCT federally funded projects have a categorical exclusion (CE) designation from FTA.

IV. General Title VI Contacts and Complaint Process

For additional information about RiverCities Transit's Title VI non-discrimination policies, obligations, and practices please contact:

RiverCities Transit
Title VI Compliance Coordinator
PO Box 128
Longview, WA 98632
360-442-5663
customerservice@rctransit.org

The public also has the ability to contact the Federal Transit Agency (FTA) directly as they deem appropriate. Regarding Civil Rights issues in general the regional contact would be:

Federal Transit Administration, Region X
Office of Civil Rights
Attention: Title VI Program Coordinator
915 Second Avenue, Suite 3142
Seattle, WA 98174

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RiverCities Transit is committed to a policy of non-discrimination in the conduct of its business, including its Title VI responsibilities, and to the delivery of equitable and accessible transportation services. Any person who believes that he or she has been subjected to discrimination under Title VI on the basis of race, color or national origin may file a Title VI complaint with RiverCities Transit within 60 calendar days from the date of the alleged discrimination. Formal complaints must be filed with RiverCities Transit in writing and addressed to:

RiverCities Transit
Title VI Compliance Coordinator
PO Box 128
Longview, WA 98632
360-442-5663

Email Customer Service

The Title VI Complaint Form may also be obtained by emailing customerservice@rctransit.org. A copy is provided in this document's *Appendix A- Complaint Process & Form*. RiverCities Transit will provide appropriate assistance upon request to complainants who are limited in their ability to communicate in English or those who may have disabilities that restrict their ability to complete the Complaint Form.

The Title VI Transit Complaint Process is consistent with RiverCities Transit's General Complaint Process which is provided as follows:

Once a complaint is received, it will be assigned to a RiverCities Transit Supervisor. In instances where additional information is needed, the Supervisor will contact the complainant by phone or in writing. Failure of the complainant to provide the requested information by a certain date may result in the administrative closure of the complaint or a delay in complaint resolution. Based upon receipt of all the information required, RiverCities Transit will investigate a Title VI complaint within 45 calendar days of receipt but will notify complainant if additional time is required. Receipt of additional relevant information and/or simultaneous filing of a complaint with RiverCities Transit and an external entity may expand the timing of the complaint resolution.

Related Sections Follow:

Appendix A –Complaint Procedure & Form
Appendix B – Samples of Communication Tools
LEP Documentation & Narrative

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Appendix A – Complaint Procedure & Form

What is Title VI of the Civil Rights Act of 1964?

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.

RiverCities Transit 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 If you believe you have been subjected to discrimination under Title VI, you may file a complaint.

How do I file a Title VI Complaint?

You may file a signed, written complaint up to one hundred and eighty (180) days from the date of alleged discrimination. 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 or important.

The complaint may be filed in writing with RiverCities Transit at the following address:

RiverCities Transit
Title VI Coordinator
PO Box 128
Longview, WA 98632
By phone: 360-442-5663
By Facsimile: 360-442-5979

NOTE: RiverCities Transit 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 my complaint after it is submitted to RiverCities Transit?

All complaints alleging discrimination based on race, color or national origin in a service or benefit provided by RiverCities Transit will be directly addressed by RiverCities Transit. RiverCities Transit shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. Additionally, RiverCities Transit 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, RiverCities Transit will contact the complainant in writing. Please note that in responding to any requests for additional information, a complainant's failure to provide the requested information may result in the administrative closure of the complaint.

Appendix A – Complaint Procedure & Form

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

How will I be notified of the outcome of my complaint?

RiverCities Transit will send a final written response to the complainant and advise the complainant of his or her right to: 1) appeal within seven (7) calendar days of receipt of the final written decision from RiverCities Transit, 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 60 working days of receipt of such complaints, if not sooner.

Can I file a complaint with another agency or organization?

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

Federal Transit Administration
Region X Office of Civil Rights
Attention: Title VI Program Coordinator
915 Second Avenue, Suite 3142
Seattle, WA 98174

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Appendix A – Complaint Procedure & Form

TITLE VI COMPLAINT FORM

Title VI of the 1964 Civil Rights Act requires that "No person in the United States shall, on the ground 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 transit services, please provide the following information in order to assist us in processing your complaint and send it to:

RiverCities Transit
Title VI Coordinator
PO Box 128
Longview, WA 98632
360-442-5663
360-442-5979 (fax)

Please print clearly or type your response. Thank you

You may file a signed, written complaint up to one hundred and eighty (180) days from the date of alleged discrimination.

Name: _____

Address: _____

City, State, Zip Code: _____

Telephone Number: _____ (home) _____ (cell)

Person discriminated against: _____

Address of person discriminated against: _____

City, State, Zip Code: _____

Please indicate why you believe the discrimination occurred :

_____ Race
_____ Color
_____ National origin

What was the date of the alleged discrimination? _____

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Appendix A – Complaint Procedure & Form

TITLE VI COMPLAINT FORM

Where did the alleged discrimination take place?

Please describe the circumstances as you saw it:

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?

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 one (1) of this document.

Your signature

Print your name

Date

Appendix B – Sample of Communication Tools

NOTICE OF PUBLIC HEARING

CONSIDERATION OF SERVICE CHANGES FOR FIXED ROUTE AND ADA PARATRANSIT SERVICES

COWLITZ TRANSIT AUTHORITY

NOTICE IS HEREBY GIVEN that public hearings will be held by the Cowlitz Transit Authority to receive public comment on the implementation of service changes for fixed route and ADA Paratransit.

The public hearings will be held at the following times and locations:

1:00 p.m. to 3:00 p.m. Tuesday, May 21, 2013, in the Council Chambers located at Longview City Hall, 1525 Broadway, Longview, WA.

1:00 p.m. to 3:00 p.m. Thursday, May 23, 2013, in the Council Chambers located at Kelso City Hall, 203 South Pacific Ave., Kelso, WA.

The purpose of these hearings is to receive any comments concerning the proposed changes to the fixed route and paratransit bus service:

Fixed Route Service:

- New route structure and bus stop locations.
- Change of service hours and frequency of service.

ADA Paratransit Service:

- New application and eligibility process.
- 2013 ADA Paratransit Plan update.

Any person interested may appear and be heard on said matter or may contact staff by telephone, e-mail or in writing, to comment on the new proposed fixed route service.

Contact Information:

Brad Windler, Mobility Supervisor
RiverCities Transit
P O Box 128
Longview, WA 98632
360.442.5607
brad.windler@ci.longview.wa.us

Both locations are accessible for persons with disabilities. Please notify us forty-eight (48) hours in advance at 442-5662 if you will need any special accommodations to attend the meeting.

DATED at Longview, Washington, this 6th day of May, 2013.

Published: Published 9th and 16th May, 2013

HEARING Fixed Route and ADA Service Changes

Language Implementation Plan Update

The attached plan directs a cross-section of divisions within the transit agency to undertake language assistance activities including the following activities that are recommended in the DOT LEP Guidance on an implementation plan:

1. Identifying LEP individuals who need language assistance.
2. Providing language assistance measures.
3. Training staff.
4. Providing notice to LEP persons of the availability of language assistance.
5. Monitoring and updating the LEP plan.

Applying Four Factor Analysis

To address federal requirements for assessing needs and providing services to Limited English Proficient (LEP) populations an assessment was based on the Four-Factor Framework outlined in the DOT LEP Guidance:

- Factor 1: Number and proportion of LEP persons served or encountered in the eligible service population.
- Factor 2: Frequency with which LEP individuals come into contact with your programs, activities and services.
- Factor 3: Importance to LEP persons of your program, activities and services.
- Factor 4: Resources available to the recipient and costs.

Factor 1: Number of and proportion of LEP persons served

Quantitative and qualitative information regarding LEP populations were researched and based on 2010 census:

Quantitative Data

Census: analysis of census data showed that the within Longview/Kelso (n = population of 47,480), estimated LEP population (n= 1,389) represents 2.9% of the total population, with the majority (869) of these residents speaking Spanish.

Qualitative Information is limited to identification of LEP populations but community based organizations (social service agencies, faith based, interagency human service organizations, and school districts) suggest that these estimates and residential locations are reliable.

Conclusions and Recommendations

1. Outreach and communication efforts to LEP persons of Spanish languages needs to be tailored to the urban areas where RiverCities Transit service exists.
2. Given the relatively small number of LEP persons that are encountered within the transit service area more customized training and assistance efforts will need to be made.
- 3.

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Language Implementation Plan Update

Factor 2: Frequency of contact

There is currently no survey information available providing ethnicity/race data and LEP status. There is currently no comprehensive process in place to routinely capture LEP contact data. Some information is obtained from bus operators and from Customer Service Representatives, but ongoing data gathering to routinely discuss LEP contacts with operators or frontline staff is limited.

Call Center Data: RiverCities Transit has two call centers that provided data. RCT did not receive any calls that needed language assistance.

Call Center	Average Calls Per Month	2013 Requests	
		Language Assistance	Language
Customer Service	1,500	0	Spanish
Paratransit	3,500	0	Other
Total	5,000	0	

Conclusions and Recommendations

1. Due to the lack of a reliable method of recording LEP data, RiverCities Transit should review and find a way to effectively capture and report this data on a regular basis.
2. Interviews with bus operators and other front line staff indicate an interest in effective training to help employees work with LEP customers. However, it is noted that given how few LEP customers there have been, increasing training initiatives could include multicultural awareness and how to communicate with non-English speaking passengers.

Factor 3: Importance of LEP Persons of your program, activities and services

RiverCities Transit shows that “most critical services” fall within Fares, Routes and Schedule and Safety and Security. These areas have been identified because of the more immediate needs that language barriers could have on a customer:

- a) Limit a person’s ability to gain full benefit from services, or
- b) In the areas of safety and security – place a person in physical danger.

In an on-going effort to improve access to public transportation services RiverCities Transit staff participate in the Transit Disability Advisory Council.

Through the efforts of this Council, community based entities in Longview and Kelso help monitor and quantify the “who, what, where, why and how” of service needs and provisions in the region.

While LEP is a recognized component of the needs in the region, it represents a small fraction of actual residential population. However, a couple of items stand out:

- RiverCities Transit frontline staff report that LEP customers experience similar issues that other RiverCities Transit customers face such as: late buses, transfers, fares and pass-ups.

Language Implementation Plan Update

- Because LEP customers don't understand English very well, they rely on family, friends and trusted community organizations to help them adapt.

Conclusions and Recommendations

1. For LEP customers, resolving customers concerns is hindered by language barriers between them and agency personnel.
2. Reliance on trusted sources for information underlies the small but growing importance of maintaining personal relationships within the LEP communities.

Factor 4: Resources available to the recipient and costs

Resources available for language assistance services is identified in the chart below. It should be noted that language assistance for LEP customers has for the past few years not been requested.

ITEM	Translation Cost	Print Quantity	Print/Production Cost
Translated web pages	Google & Bing provide this for free		NA
Route Surveys (varies by yr)	0	500	Internal printing
TEP Rider Survey (2010)	0	2,500	Internal Printing
Total	\$0	3,000	\$0

Conclusions and Recommendations

1. Transit agency staff has been proactively seeking ways to assist LEP customers as the need arises. While the current need remains relatively low, it is anticipated that LEP customer base will increase slightly over the next several years. LEP service requests will become more prominent.
2. To continue to improve LEP initiatives, the agency will need to direct efforts that deal more directly with the changing ridership demographics.
3. To grow the program, new sources of funding may be needed and/or efforts to integrate LEP initiatives into internal processes will need additional support from the agency's management team.

LEP Access Plan Implementation Calendar

Efforts to put into place LEP program components are now in the process of being assessed, now that RCT has a better understanding of what the LEP community is here locally and the relatively small number of people needing assistance.

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Language Implementation Plan Update

Capital Projects & Facilities

ITEM	NOW	FY15	FY16
Assess the LEP population in areas affected by any capital facilities: Develop an outreach plan targeting LEP residents and businesses in construction areas.			X
Use of in-person interpreter services upon request for public meetings and important events (marketing and Customer Service staff provide notification to the community about availability of interpretive services).	X		
Translate vital documents.	X		
Provide notice of language assistance, at no cost, on non-vital yet important outreach documents.	X		

Legal/Human Resources

ITEM	NOW	FY15	FY16
Develop/review contract language to ensure all contractors providing goods and services are in compliance with Title VI regulations (Title VI of the Civil Rights Act of 1964, Nondiscrimination under Programs Receiving Federal Financial Assistance through the U.S. Department of Transportation”).	X		
Determine which documents meet the definition of “vital documents”; stay aware of new documents that may be considered “vital”.		X	
Develop curriculum and train frontline and other key staff in: <ul style="list-style-type: none"> • awareness of type of language services available • how staff and/or LEP customers can obtain these services • how to respond to LEP callers • how to respond to correspondence from LEPs • how to respond to LEPs in person • how to document LEP needs • how to respond to civil rights complaints. 	X X X	X X	
Incorporate LEP plan information into updated employee orientation handbook.		X	

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Marketing/Communications and Customer Services

ITEM	NOW	FY15	FY16
Provide telephone interpretation for basic transit questions and trip planning assistance in virtually any language.	X		
Establish competency standards for interpreters and translators.			X
Draft a policy that states that all interpretation and written translation must be performed by approved vendors/individuals whose competency has been established.			X
Add a question to Survey to assess respondents' English proficiency and primary spoken language.			X
Develop a process for determining: <ul style="list-style-type: none"> if a particular document needs to be translated into which languages it should be translated. 		X	
Establish an agency-wide workflow whereby all written translation requests are routed through and managed to ensure consistency.	X		
Translate vital documents, including: signage that communicates hazardous pedestrian access in areas of high LEP concentration signage that indicates prohibited behavior in areas of high LEP concentration			X
Place a notice of language assistance, at no cost, on important outreach documents and on website.	X		
Develop formal procedures for documenting the number of requests by LEPs for ticket/pass purchases.		X	
Provide information about complaint process			X
Identify routes serving areas with high concentrations of LEP individuals.	X		
Create protocol for responding to foreign language correspondence and communication.			X
Day-to-day administration of LEP program, ensuring compliance and correct implementation.		X	

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Language Implementation Plan Update

Operations

ITEM	NOW	FY15	FY16
Provide training to operators and other frontline employees in LEP policies and procedures.			X

Planning

ITEM	NOW	FY15	FY16
Identify areas within the service area that have high concentrations of LEP individuals.	X		
Conduct an evaluation of LEP plan to gauge its effectiveness and determine if updates are needed every two years. assess whether existing language assistance services are meeting the needs of clients with LEP assess whether staff members understand LEP policies and procedures, how to carry them out, and whether language assistance resources and arrangements for those resources are still current and accessible seek feedback from LEP communities, including customers and community organizations, about the effectiveness of RiverCities Transit's LEP plan			X

Additional Services

ITEM	NOW	FY15	FY16
Provide information online about RCT's LEP services			X
Provide one-on-one and group travel training to LEPs by working through an interpreter and Travel Trainer.		X	
Establish partnerships and work closely with community organizations that serve LEP populations.	X		
Identify service changes affecting areas with high concentrations of LEP individuals and develop mitigation strategies.			X
Survey staff to determine existing bilingual resources.	X		