

BEFORE THE BOARD OF HEALTH
SPOKANE REGIONAL HEALTH DISTRICT

RESOLUTION #21-01

RE: ADOPTING A SRHD TITLE VI NON-DISCRIMINATION PLAN AND APPROVAL FOR BOARD CHAIR TO SIGN TITLE VI NON-DISCRIMINATION CERTIFICATION

WHEREAS the Board of Health recognizes that Spokane Regional Health District is required to comply with Civil Rights Act Title VI requirements.

NOW, THEREFORE, BE IT HEREBY RESOLVED BY THE BOARD OF HEALTH, that the attached Spokane Regional Health District Title VI Non-Discrimination Plan is adopted, and

BE IT FURTHER RESOLVED that the Board gives approval for the Chair to sign the Title VI Non-Discrimination Certification.

BE IT FURTHER RESOLVED that the provisions of the attached Spokane Regional Health District Title VI Non-Discrimination Plan shall be effective immediately upon adoption.

NOW, THEREFORE, BE IT HEREBY RESOLVED BY THE BOARD OF HEALTH, that Spokane Regional Health District adopts the Public Participation plan and the Language Assistance Plan provisions of the attached Title VI Non-Discrimination Plan as its own plan until such time as Spokane Regional Health District develops and the Board of Health adopts an agency-specific Title VI Non-Discrimination Plan.

Signed this 25th day of March 2021 in Spokane, Washington.

SPOKANE REGIONAL HEALTH DISTRICT
BOARD OF HEALTH

ABSENT

CHAIR, COMMISSIONER MARY KUNEY



VICE CHAIR, MAYOR KEVIN FREEMAN



Breean Beggs (Apr 21, 2021 16:54 PDT)

BREEAN BEGGS, COUNCIL PRESIDENT



Josh Kerns (Apr 21, 2021 11:55 PDT)

JOSH KERNS, COMMISSIONER

ABSENT

AL FRENCH, COMMISSIONER

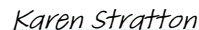


Jason Kinley (Apr 21, 2021 13:49 PDT)

JASON KINLEY, BOARD MEMBER



ANDREA FROSTAD, BOARD MEMBER



Karen Stratton (Apr 23, 2021 08:07 PDT)

KAREN STRATTON, COUNCILMEMBER

ABSENT

CHUCK HAFNER, BOARD MEMBER



Ben Wick (Apr 28, 2021 08:49 PDT)

BEN WICK, MAYOR



Tim Hattenburg (Apr 22, 2021 14:53 PDT)

TIM HATTENBURG, COUNCILMEMBER



BETSY WILKERSON (Apr 22, 2021 11:00 PDT)

BETSY WILKERSON, COUNCILMEMBER

Spokane Regional Health District Title VI (Non-Discrimination) Plan



Created: March 2017
Implemented: May 2017
Revised: February 2021

1 INTRODUCTION

Spokane Regional Health District (SRHD) is a Federal Transit Administration (FTA) sub-recipient of Spokane Transit Authority (STA). STA contracts with SRHD to fund commuter incentives, employer programs, and other transportation demand management efforts. SRHD does not directly provide any transit services.

To meet Title VI program requirements, SRHD has its own procedures to meet certain requirements, such as a complaint process and public participation. SRHD will rely upon the analysis and overall program efforts conducted by STA to meet requirements.

Since SRHD does not operate any transit service, this plan only addresses the general reporting requirements.

2 GENERAL REPORTING REQUIREMENTS

2.1 Title VI Notice to the Public

SRHD notifies the public that it complies with the requirements of Title VI and related statues and regulations. Notices are posted in the entranceway of SRHD and on the agency's website. The wording of the notice is as follows:

The Spokane Regional Health District (SRHD) hereby gives public notice that it is the policy of the agency to assure full compliance with Title VI of the Civil Right Act of 1964, as amended, the Civil Rights Restoration Act of 1987, Executive Order (E.O.) 12898, Title I and II of the Americans with Disability Act of 1990 and related statues and regulations in all programs and activities. SRHD does not discriminate based on race, color, national origin, disability, age, sex, sexual orientation or gender identity. SRHD will not exclude from the participation in, deny the benefits of, or be otherwise subject to discrimination under any program or activity for which the agency received federal financial assistance any individual on the grounds of race, color, national origin, disability, age, sex, sexual orientation or gender identity.

SRHD does not discriminate in its hiring or employment practices and complies with all federal regulations.

SRHD provides reasonable accommodation for auxiliary aids, alternative formats and language services for people whose primary language is not English. To request these services, contact the Administration office at 509.324.1501 as soon as possible, but no later than 72 hours before a scheduled event.

Any person who believes they have been aggrieved by an unlawful civil rights discriminatory practice has a right to file a formal complaint with SRHD. Any such complaint must be in writing and filed with the Administration Office of the Spokane Regional Health District within one hundred eighty (180) days following the date of the alleged discriminatory occurrence. To file a complaint, please contact the Administration office at 509-324-1501

In accordance with Title VI of the Civil Rights Act of 1964, SRHD does not discriminate based on 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 the SRHD Administration office at 509.324.1500 or 1101 West College Avenue, Suite 330, Spokane, WA 99201.

If information is needed in another language, contact 509.324.1500

Si necesita información en otro idioma, comuníquese al 509.324.1500

Для получения информации на другом языке звоните по тел. 509.324.1500

Nếu quý vị cần thông tin bằng một ngôn ngữ khác, xin vui long gọi số 509.324.1500

2.2 Title VI Complaint Process and Form

A Title VI complaint form and instructions for filling out a Title VI complaint can be obtained from the Administration Office of SRHD. See Appendix A.

2.3 Title VI Investigations, Complaints, and Lawsuits

SRHD has had no Title VI complaints, investigations, or lawsuits related to transit during the past three (3) years.

2.4 Public Participation Plan

SRHD fully encourages public involvement and participation in decision making processes. As part of the STA work plan for public transit projects, SRHD adopts the public participation plan of STA Title VI Program Report and will coordinate with STA in public participation efforts related to transit projects being managed by SRHD. See Appendix D

2.5 Language Assistance Plan

SRHD relies upon the limited English proficiency analysis conducted by STA that summarizes the outreach efforts made to engage minority and limited English proficiency groups. See Appendix E.

2.6 Non-Elected Committees and Councils

SRHD does not have any transit-related committees or councils. SRHD will conduct an analysis of the ethnic and racial breakdown of their non-elected committees, councils, and advisory boards; when complete, results of the analysis will include as an appendix of the next plan.

2.7 Monitoring Sub-Recipients

SRHD has no sub-recipients. It will cooperate with STA in providing information and attending meetings as required by STA in its monitoring procedures of our efforts.

2.8 Review of Facilities Constructed

SRHD did not build any storage facilities, maintenance facilities, or operations centers and did not modify any facilities that require Title VI analysis.

2.9 Documentation of Governing Body Review and Approval of the Title VI Plan

On [date], the SRHD Board of Health (BOH) adopted this Title VI plan and signed the Title VI Non-Discrimination Certification. See Appendix B and C.

3 APPENDICES

3.1 Appendix A – SRHD Civil Rights Complaint Process and Form

3.2 Appendix B – SRHD BOH Resolution

3.3 Appendix C – SRHD Title VI Certification

3.4 Appendix D – STA Public Participation Plan

3.5 Appendix E – STA Language Assistance Plan



Civil Rights Complaint Form

COMPLAINT OF DISCRIMINATION ON THE BASIS OF TITLE VI AND ADA AGAINST THE SPOKANE REGIONAL HEALTH DISTRICT

Who can file a complaint?

Any individual, group of individuals, or entity that believes they have discriminated against based on race, color, national origin, disability, age, sex, sexual orientation or gender identity as provided by Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987 and the Americans with Disabilities Act of 1990.

Any individual having filed a complaint or participating in the investigation of a complaint shall not be subjected to any form of intimidation or retaliation. Individuals who have cause to think that they have been subjected to intimidation or retaliation can file a complaint of retaliation following the same process for filling a discrimination complaint.

How do I file a complaint?

A formal complaint must be filed within one hundred and eighty (180) calendar days of the alleged occurrence. To file a formal complaint, fill out and submit the completed form to the Administration Office of the Spokane Regional Health District (SRHD). SRHD will not officially act or respond to complaints made verbally.

What happens when I file a complaint?

Upon receiving the written complaint, SRHD will appoint a coordinator to investigate and adjudicate the complaint. The coordinator will send a letter of acknowledgement within ten (10) days of receiving the complaint.

The coordinator will determine the complaint's jurisdiction, acceptability, need for additional information, and the investigative merit of the complaint. SRHD has forty-five (45) days to investigate the complaint. If more information is needed to resolve the case, the coordinator may contact the complainant.

After the coordinator reviews the complaint, they will issue one of two (2) letters of resolution: a closure letter or a letter of finding.

- A closure letter summarizes the allegations and states that there was not a Title VI or ADA violation and that the case will be closed.
- A letter of finding summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur.

What if I don't agree with the agency's letter of resolution?

A complainant who does not agree with the letter of resolution may submit a written request for a different resolution to the Administration Office of SRHD within thirty (30) days of the date of the letter. SRHD will analyze the facts of the case and will issue its conclusion to the appellant within 60 days of the receipt of the appeal.

Do I need an attorney to file or handle a complaint?

No, however, a complainant may wish to seek advice from private counsel regarding their rights under the law.

Submit completed complaint form to:

Spokane Regional Health District
Administration Office
1101 W. College Avenue, Suite 330
Spokane, WA 99201



Civil Rights Complaint Form

Section I: Complainant Contact Information			
Last Name: []		First: []	M.I.: []
Address: []		City: []	State: [] Zip Code: []
Phone #: []		Email Address: []	
Section II: Other Party			
Are you filing this complaint on your own behalf? <input type="checkbox"/> Yes <input type="checkbox"/> No			
<i>If yes, go to Section III. If no, please complete the following information:</i>			
Name: []		Relationship to the Complainant: []	
Phone #: []		Email Address: []	
Please confirm that the Complainant knows you are filing this complaint. <input type="checkbox"/> Yes <input type="checkbox"/> No			
Section III: Allegation			
I believe the alleged discrimination I experienced was based on (check all that apply):			
<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> National Origin	<input type="checkbox"/> Disability
<input type="checkbox"/> Age	<input type="checkbox"/> Sex	<input type="checkbox"/> Sexual Orientation	<input type="checkbox"/> Gender Identity
Date of Alleged Discrimination (month/day/year): []			
As clearly as possible describe the alleged discrimination. Explain what happened and who you believe was responsible. Please attach extra pages if additional space is needed.			
[]			
[]			
Please provide the name, phone number, and mailing address for anyone who witnessed the alleged discrimination:			
Name: []		Phone #: []	
Address: []		City: []	State: [] Zip Code: []
Name: []		Phone #: []	
Address: []		City: []	State: [] Zip Code: []
Section IV:			
Have you filed this complaint with any other agency? <input type="checkbox"/> Yes <input type="checkbox"/> No			
Agency Name: []		Contact Name: []	Phone # []

Note: You may attach any written materials or other information that you think is relevant to your complaint.

I hereby certify that the information provided is true and correct to the best of my knowledge.

Signature _____ Date _____

**BEFORE THE BOARD OF HEALTH
SPOKANE REGIONAL HEALTH DISTRICT**

Appendix B

RESOLUTION #21-01

RE: ADOPTING A SRHD TITLE VI NON-DISCRIMINATION PLAN AND APPROVAL FOR BOARD CHAIR TO SIGN TITLE VI NON-DISCRIMINATION CERTIFICATION

WHEREAS the Board of Health recognizes that Spokane Regional Health District is required to comply with Civil Rights Act Title VI requirements.

NOW, THEREFORE, BE IT HEREBY RESOLVED BY THE BOARD OF HEALTH, that the attached Spokane Regional Health District Title VI Non-Discrimination Plan is adopted, and

BE IT FURTHER RESOLVED that the Board gives approval for the Chair to sign the Title VI Non-Discrimination Certification.

BE IT FURTHER RESOLVED that the provisions of the attached Spokane Regional Health District Title VI Non-Discrimination Plan shall be effective immediately upon adoption.

Signed this 25th day of March 2021 in Spokane, Washington.

SPOKANE REGIONAL HEALTH DISTRICT
BOARD OF HEALTH

CHAIR, COMMISSIONER MARY KUNEY

VICE CHAIR, MAYOR KEVIN FREEMAN

BREEAN BEGGS, COUNCIL PRESIDENT

JOSH KERNS, COMMISSIONER

AL FRENCH, COMMISSIONER

JASON KINLEY, BOARD MEMBER

ANDREA FROSTAD, BOARD MEMBER

KAREN STRATTON, COUNCILMEMBER

CHUCK HAFNER, BOARD MEMBER

BEN WICK, MAYOR

TIM HATTENBURG, COUNCILMEMBER

BETSY WILKERSON, COUNCILMEMBER

Title VI (Non-Discrimination) Certification



Spokane Regional Health District agrees that it must comply with applicable federal civil rights laws, regulations, requirements, and guidance, and follow applicable federal guidance, except as the Federal Government determines otherwise in writing. Therefore, unless a recipient or a federal program is specifically exempted from a civil rights statute, Federal Transit Administration (FTA) requires compliance with that civil rights statute, including compliance with the Non-Discrimination – Title VI of the Civil Rights Act.

Spokane Regional Health District will:

1. Prohibit discrimination based on race, color, or natural origin,
2. Comply with:
 - a. Title VI of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000d *et seq.*,
 - b. U.S. DOT regulations, “Nondiscrimination in Federally-Assisted Programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act of 1964,” 49 C.F.R. part 21, and
 - c. Federal transit law, specifically 49 U.S.C. § 5332, and
 - d. Follow:
 - i. The most recent edition of FTA Circular 4702.1.B, “Title VI Requirements and Guidelines for Federal Transit Administration Recipients,” to the extent consistent with applicable federal laws, regulations, requirements, and guidance,
 - ii. U.S. DOJ, “Guidelines for the enforcement of Title VI, Civil Rights Act of 1964,” 28 C.F.R. § 50.3, and
 - iii. All other applicable federal guidance that may be issued.

SPOKANE REGIONAL HEALTH DISTRICT

Authorized Representative Signature

Date

Print Name

Print Title

Who by this signature certifies their authority to agree to comply with Title VI requirements on behalf of the Spokane Regional Health District.

SECTION 5 PUBLIC PARTICIPATION PLAN

Overview

To encourage public participation in Spokane Transit planning activities, the STA Board of Directors adopted a list of Communication Public Outreach goals, principles, and policies as part of the STA comprehensive plan, Connect Spokane, in September 2010 and revised on May 16, 2019. These policies are incorporated into the Title VI program. STA will apply these adopted measures when performing outreach efforts to minority, low-income, and limited English proficient (LEP) populations and will use the appropriate outreach tools depending on the scale of projects including major service and fare changes.

Communications and Public Input

The following Goals, Principles, and Policies were adopted by the STA Board of Directors as part of STA's Connect Spokane Comprehensive Plan. As a public agency, Spokane Transit Authority believes that proper communications and public input is of the highest importance. To ensure transparency, accountability, and fairness, STA must use a broad range of communication tools to reach as many people as possible. As technology improves, the amount of information available and the speed at which it can reach those interested increases daily, creating both opportunities and challenges. Fortunately, STA is able to use a variety of communications tools to both inform and gather information. The following list is not intended to be a complete list of communications tools which may be used but a sample of some strategies that STA may use for a variety of purposes. (Connect Spokane page 71, along with the Table 5 below).

Table 5 Public Outreach Tools

Outreach Tool	Definition
Public Hearing	A meeting during which public testimony may be heard and formal action may be taken on any measure before the STA Board of Directors
Legal Notice	Public posting or advertising in newspapers to announce a legal action or intent
Display Ads in Newspaper	Paid advertisement in the newspaper to alert readers about an upcoming event or action
Website/Online Social Media	Updates to the website and social media are quick and efficient ways of getting notice to the public quickly
Mobile Device Alerts	Real-time information can alert customers to important real-time information
Signs	Signs on buses, at stop locations, and at transit centers can help to reach people who use transit services
Rider Alerts	Notifications of route, frequency, or other information that is of particular interest to riders
Direct Mailings	Mail sent to an affected group or area to educate, notify, or request input
Workshops/Open Houses/Town Halls	Types of meetings where staff and public interact and discuss various issues
Surveys (scientific and self-selected)	Surveying opinions and ideas can help public agencies understand how to better serve the constituency
On-board Information	Pamphlets and posters that alert riders to information
Displays at Transit Centers	Permanent or temporary displays at transit centers are able to reach a large number of system riders
SEPA	The public outreach requirements of Washington State’s State Environmental Protection Act (SEPA) can be an effective tool for communicating with the public about proposed actions



Communications and Public Input Goal

STA will promote openness, honesty, and fairness through appropriate public outreach efforts. (Connect Spokane page 72)

Communications and Public Input Principles

These principles (Connect Spokane pages 72-73) describe the foundation for the policies found in this element:

1. Continuous Communication

Open, honest, early, and continuous communication with all stakeholders increases public confidence in STA.

Changes in STA's operations impact many stakeholders, both within and outside of the agency. For this reason, care should be taken to ensure all stakeholders are identified and remain wellinformed.

2. Accountable

A public account of decisions made and responses to public input regarding these decisions increases STA's accountability to its customers.

Thorough recordkeeping helps to ensure a common understanding of decisions, policies, and responses. Sharing records with the public demonstrates the transparency with which STA conducts its business.

3. Accessible Information

Providing access and non-technical explanations of relevant reports, records, and documents demonstrates STA's commitment to transparency.

STA conducts its business in a fair, honest, and legal manner. For that reason, providing access to relevant documents broadens the public's perception of STA's high operating standards.

4. Two-way Communications

Consideration of the views of regulators, stakeholders, and the general public in making decisions demonstrates STA's commitment to fairness and equity.

Transit agencies exist to serve the community. To that end, community members have the right to share their views regarding transit service.

5. Timely

The provision of sufficient time for full public participation, including advance notice of activities and steps in the public process, demonstrates fairness and respect.

Scheduling events and the overall public process with an appreciation of today's busy lifestyles allows for the broadest public participation process possible.

6. Purposeful

Questions pertinent to issues under consideration should be answered by knowledgeable staff.

One can appreciate the frustration stemming from poorly-answered questions. Providing complete, accurate information increases the public's confidence in STA.

Communications and Public Input Policies

(Note: These Public Input Policies [Connect Spokane pages 73-77] will apply when planning outreach efforts to engage low-income, minority, and LEP populations, along with other affected or disadvantaged groups and the general public.)

CI-1.0 – Public Outreach

The following policies are intended to serve as a guide describing public outreach/input requirements for each action. In cases where there are federal or state requirements for public outreach/input, STA will meet the minimum requirements. In cases where STA has requirements in addition to those defined by the state or federal government, STA will follow both.

1.1 Service Changes

In addition to following Federal Transit Administration guidelines for public outreach for service reductions, STA will also comply with the policy found in the following table.

How to read the following table:

- 1) Determine cost and ridership impacts.
- 2) Consider exceptions.
- 3) The more severe cost or ridership impact determines the category (ex. Cost impacts fall into Category II but ridership impacts fall into Category I, follow the decision making and input/outreach process of Category II)

Any fixed-route adjustment or elimination which would change the paratransit boundary enough to eliminate service from at least one active customer* will trigger a Category II process.

*Active customer is someone who has used paratransit services within a year of the public hearing date.

Table 6 Public Input Policies

		Public Input Categories		
		I-Minor	II-Moderate	III-Major
Determining Threshold	Cost Impacts	Less than 1.0% growth or reduction in revenue hours of service in any calendar year	1.0% up to 5.0% reduction or 1.0% - 10% growth in revenue hours of service in any calendar year	More than 5.0% reduction or more than 10% growth in revenue hours of service in any calendar year
	OR Ridership Impacts	OR Less than .5% of annualized system ridership negatively impacted by loss of bus stop, trips or route at any given service change	OR .5% up to 5.0% of annualized system ridership negatively impacted by loss of bus stop, trips or route at any given service change	OR 5% or more of annualized system ridership negatively impacted by loss of bus stop(s), trip(s) or route(s) at any given service change
Resulting Actions	Exceptions	Construction-related or emergency changes necessary for a period not exceeding 180 days for changes that would otherwise be moderate or major	Changes that would normally be classified as minor changes, but require a higher classification because of significant public interest or board involvement	None
	Input and Outreach	Employee and customer input, etc. Documented informal outreach for feedback on changes; may include survey or other tools	Outreach activities including driver and rider input, surveys, meetings with community groups, or other tools. Report to Board on activities.	Public Outreach Plan approved by Board in advance of outreach, which may include outreach to affected community groups, employers, etc.
Examples	Decision Making Process	CEO or designee; staff report detailing changes submitted to the Board prior to changes going into effect (except for exceptions that are reported at least 30 days after)	Public hearing prior to Operations Committee and Board action.	At least one public hearing. Board action following Operations Committee recommendation with Title VI report.
		<ul style="list-style-type: none"> • Running time adjustments • Departure time adjustments • Minor bus reroutes • Changes to bus stop locations (Per CI 1.4) 	<ul style="list-style-type: none"> • Significant route changes • Addition or deletion of service to a large area 	<ul style="list-style-type: none"> • A large service reduction • A restructure of the network

1.2 Fare Increases

Fare increases of more than 10% in any three-year period shall be considered through the public outreach process as a Category III-Major Change as defined in Policy 1.1. For cumulative changes, the Category III-Major Change public process will only be applied to the increase which breaks the 10% threshold, not the previous increases.

1.3 Grants

Table 7 Public Process for Grants

Grant Condition	Public Process
Grants in Capital Improvement Program (CIP)	Adoption of CIP will serve as the public process
Grants applications less than \$1 million*	Notice on STA's website
Grants applications at least \$1 million*	Adoption by Board of Directors

*If grant application project is not contained in the Capital Improvement Program

1.4 Stop Changes

If the cumulative stop changes that take place within a calendar year affect the boardings of 10% of a route's annual ridership, STA will use the tools described in the beginning of this element to gather public input before a final decision is made.

A stop serves as the point at which a rider can access the transit service. The placement of this access is important for the rider, driver, and riders already on board. STA is continually evaluating stop locations along all transit routes by considering safety, stop spacing, and proximity to destinations.

1.5 Transit Development Plan

STA will hold at least one public hearing while developing its program for each annual update.

As a public transportation benefit area authority in Washington State, STA is required to prepare a six-year transit development plan (TDP) and annual report. This document provides updated information to the Washington State Department of Transportation on the various activities of STA. The TDP can be found here: <https://www.spokanetransit.com/projects-plans/transitdevelopment-plan>.

1.6 Comprehensive Plan

STA will undertake public outreach efforts for subsequent updates to the Comprehensive Plan and allow an opportunity for public testimony prior to any substantive amendments.

Any change which affects the substance of the Comprehensive Plan will require a public hearing and supporting public outreach.

1.7 Disadvantaged Business Enterprise (DBE)

The DBE goals will be available on STA's website for no less than 15 days prior to adoption by the Board.

1.8 Title VI Reporting

During major service reductions and fare increases, STA will conduct an analysis to verify that no discrimination of protected classes takes place.

Title VI provides 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.”

1.9 Major Capital Projects

During the annual Capital Improvement Program (See System Infrastructure Policy 4.0) update process, which identifies all major capital projects, appropriate public outreach and a public hearing shall take place prior to adoption. Amendments to the Capital Improvement Program will follow a similar process.

Any capital project requiring board approval and outside of the normal budgeting process shall be subject to a public hearing to receive public input and testimony.

1.10 HPT Corridor Planning

During any Alternatives Analysis for a High Performance Transit corridor, STA or its consultant will develop a public outreach plan to both gather input and provide information about the project being evaluated.

1.11 Budget

STA shall hold at least one public hearing prior to the adoption of the annual budget.

Each year the Board of Directors adopts an annual budget that outlines how the agency intends to spend tax, fare, grant and advertising monies.

1.12 NEPA/SEPA/Environmental outreach

Where appropriate or required, STA shall incorporate public outreach and SEPA and NEPA evaluations, with the intent to exceed minimum requirements.

1.13 Major Construction Projects

STA shall hold at least one public hearing prior to the adoption of the annual budget.

Each year the Board of Directors adopts an annual budget that outlines how the agency intends to spend tax, fare, grant and advertising monies.

CI—2.0 Service Communication

2.1 Branding

All branding shall be part of a coordinated system-wide branding plan developed to better the customer experience.

Effective branding can help the customer by conveying simple messages about frequency, span, destinations, and connectivity. By creating a larger branding plan, STA will be consistent with branding styles and purposes.

2.2 Technology

Use improving technology to increase the amount of ridership information available to customers.

By using new and existing technologies, STA can increase ridership by creating a more pleasant experience for transit riders. Technology can decrease wait time, improve decisions about mode choice, increase safety, etc.

2.3 Public Education

Invest resources in educating existing and potential customers about travel options.

STA offers a variety of transportation services (i.e. fixed-route, paratransit, rideshare) that assist in providing solutions to many different customer needs. By investing in education, STA can help customers ensure that they are best utilizing the transportation services which STA provides.

Public Outreach Techniques for Title VI Populations

Depending on the project, STA may use a variety of different outreach techniques to engage Title VI populations. Some of these include:

- Providing information with meeting notices on how to request translation assistance
- Visualization techniques including maps and graphics to assist Title VI populations
- When multiple meetings are held for a single subject, efforts are made to use different meeting locations, days of the week, and times of the day
- Informing organizations within the community that work closely with low income and minority populations to inform the public of meetings, open houses, and other STA activities
- Published notices in minority newspapers
- Targeted ads on Facebook and Twitter
- On board rider survey to gather demographic data

Summary of Public Outreach and Involvement

Spokane Transit has conducted numerous public outreach efforts to the general public and targeted outreach efforts to limited-English populations, low-income and minority groups. Below is a listing of some of these activities by project or mode for the last 3 years. Please note this is not an exhaustive list but rather a summary of activities.

Mobility Training and Mobility Mentor Program

Spokane Transit offers a Mobility Mentor Program that helps seniors, people with disabilities and other groups learn to confidently ride the bus. Mobility Training is a free Spokane Transit program that helps individuals gain more independence by assisting them in becoming fixed route bus riders. Participants are familiarized with how the system works, from bus routes to ticketing, and most importantly, how the system can work for their specific needs. The mobility trainers meet with groups that are interested in learning about transit. Below is a list of organizations that the mobility mentors have met with over the last three years.

Table 8 List of Organizations Involved in Mobility Mentor Program

Organization	Targeted Population
Appleway	Low-income
Applewood Apartments	Low-income Housing
Bernadette Place	Low-income Housing
Buder Haven	Low-income Housing
Canterbury Courts Apartments	Low-income, Senior Housing
Cathedral Plaza Apartments	Low-income Housing
Catholic Charities	Service Provider
Clare View Retirement Community	Low-income, Senior Housing
Corbin Senior Center	Senior Activities
Country Heights Apartments	Low-income Housing
Department of Social and Health Services	Public Assistance
Grace Court Apartments	Low-income, Senior Housing
Heritage Heights	Low-income, Senior Housing
HiFumi En	Senior, Disabled, Low-Income Housing
Hope House	Low-income Housing
Lilac Plaza Retirement Home	Low-income, Senior Housing
Lilac Terrace Retirement Community	Low-income, Senior Housing
Manito Gardens	Low-income, Senior Housing
Maplewood Gardens	Senior Housing
Mid-City Concerns	Senior, Low-income Service Provider
Park Towers Apartments	Low-income, Affordable Housing
Ponderosas Apartments	Senior Housing
Refugee Connections	Minority, LEP
Salvation Army	Service Provider
SNAP	Service Provider
The Delaney Apartments	Low-income Housing
The O'Malley Apartments	Senior, Disabled Housing
The Parsons Apartments	Senior, Disabled, Low-Income Housing
The Vintage Apartments	Senior Housing
World Relief	Minority, LEP
YMCA	Service Provider
YWCA	Women, Low-income Service Provider

Project Specific Outreach

Spokane Transit may conduct project specific outreach for low-income, limited-English proficiency and minority groups during the public input phase of the project. Notable examples of this outreach include:

- Sending notice of online public surveys to an agency-maintained distribution list (for limited English proficiency, minority and low-income groups),
- Placing the Title VI non-discrimination notice on fliers and invitations to outreach events. If space is limited, this may only include the statement “If information is needed in another language, contact (509) 325-6094”, translated into the safe harbor languages. Examples of this type of outreach include,
 - Central City Line: In-Person and/or Online Open Houses in October 2017, January 2018, February 2019,, and service provider roundtable design discussion in February 2018.
 - Monroe-Regal: Online and in-person open house, September 2018
 - Service Changes 2020-2022: Online open house, October-November 2019
- Outreach and sponsorship at community events that interact with minority, low-income and limited English populations. Examples include, Unity in the Community (2019), Valleyfest and Bloomsday.
- Collection of demographic data at outreach events to understand what groups are participating. For example,
 - The Central City Line online and in-person open house hosted from October 2017 to October 2019. STA collected information from the respondents on their ethnicity, age, gender, place of residence, and transportation choices.
 - The 2020-2022 Service Changes online workshop collected information on what languages are spoken at home, place of residence, age and transportation choices. This workshop collected responses from October 10, 2019 through November 7, 2019.
 - The 2020-2022 Service Change outreach efforts included Rider Roundtables. Riders from specific geographic regions were asked to attend a roundtable event that included a workshop on potential service changes. Attendees were thanked for their service with a free 31-day bus pass. Children were accommodated at the meeting with snacks and activities. The date, time and location for each roundtable was selected by the group to ensure the highest number of attendees were able to participate. At these events a survey was collected on the income, race, geographic location, and ethnicity of the participants.
 - October 2019 Service Providers Survey was mailed to organizations.
 - September 2018 On Board Passenger Survey conducted. This survey was available in the three safe harbor languages.

SECTION 6 LIMITED ENGLISH PROFICIENCY ANALYSIS AND LANGUAGE ASSISTANCE PLAN

Introduction

Spokane Transit Authority (STA) has conducted a Four-Factor Analysis to meet the requirements under Title VI of the Civil Rights Act of 1964. The Four-Factor Analysis provides a framework to conduct a needs assessment of people with Limited English Proficiency (LEP). Based on the needs assessment, a language assistance plan was developed that was consistent with the provisions of Section VII of the LEP guidance.

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 benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance. In *Lau v. Nichols*, 414 U.S. 563 (1974), the U.S. Supreme Court interpreted Title VI regulations as prohibiting conduct that has a disproportionate effect on persons with Limited English Proficiency (LEP) because such conduct constitutes national origin discrimination.

According to the Federal Transit Administration Office of Civil Rights handbook dated April 13, 2007, *Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers*, "Individuals, who have a limited ability to read, write, speak, or understand English are limited English proficient or 'LEP.'"

The Four-Factor Analysis

This analysis will identify and answer four questions to assist in the development of the Language Assistance Plan and determine the level of LEP assistance needed. These four questions are as follows:

- What is the number and proportion of LEP persons served or encountered in the eligible service population?
- What is the frequency with which LEP individuals come into contact with a STA program, activity, or service?
- What is the nature and importance of the program, activity, or service provided by Spokane Transit Authority to the LEP community?
- What are the resources available to Spokane Transit Authority and overall costs?

Four-Factor Summary

Within the STA service area, LEP persons represent 2.9% of the total population. Of that LEP population, 3.4% commute mainly by transit. STA estimates that for the LEP population within the service area, 46% rely on transit service a lot, while 31.9% rely on transit a moderate amount. Based upon these findings, STA has concluded that extensive outreach to LEP populations provides minimal results. There are few LEP people within the STA service area, and only a small portion of them use public transit. There are many services within the community that work with LEP populations in order to assist them in how to use the bus. In conclusion, the appropriate level of outreach is minimal, but includes, targeted notifications to LEP organizations (depending on the project), language translation upon request, website translation, and staff training.

Service Coverage

The service area defined for STA's Title VI Plan includes the cities of Spokane, Airway Heights, Cheney, Liberty Lake, Medical Lake, Millwood, and Spokane Valley, as well as limited unincorporated areas of Spokane County. In order to better understand the population within STA's PTBA, data was collected using U.S. Census Tracts partially or completely within the PTBA boundary. There are 105 census tracts within Spokane County, but only 98 tracts that intersect the PTBA boundary. The 7 tracts omitted from the Spokane County data did not fall within the PTBA boundary. These tracts were 102.01, 102.02, 103.01, 103.03, 103.04, 133, and 143. While this method of measurement does account for a small number of people outside of the geographic bounds of the PTBA, it was important to include these tracts, ensuring that LEP populations were included in the demographic analysis. LEP persons may use transit to reach destinations throughout the PTBA including employment, colleges and universities, health clinics, and housing.

Methods of Data and Information Gathering:

- Collected census data on LEP populations by census tract (Table 9), language spoken (Table 10), and transportation mode (Table 11) for the PTBA
- Sent an electronic letter to a list of service providers working with LEP populations in Spokane County and asked them to participate in an online survey through Survey Monkey or paper 40 2020 Title VI Plan Spokane Transit Authority response. STA received 76 responses from 31 different organizations.

The letter to service providers along with a sample survey, and the results are included in Attachment B.

Factor 1: The Number and Proportion of LEP Persons Served or Encountered in the Eligible Service Population.

Census Overview

Individuals demonstrating a limited ability to read, write, speak, or understand English are considered to have limited-English proficiency. According to the 2017 American Community Survey (ACS), 12,528 of the 432,221 people within the PTBA reported speaking English “less than very well”, or 2.9% (Table 9). Map 4 shows the percent of LEP population within the PTBA by census tract.

Table 9 PTBA LEP Population by Census Tract

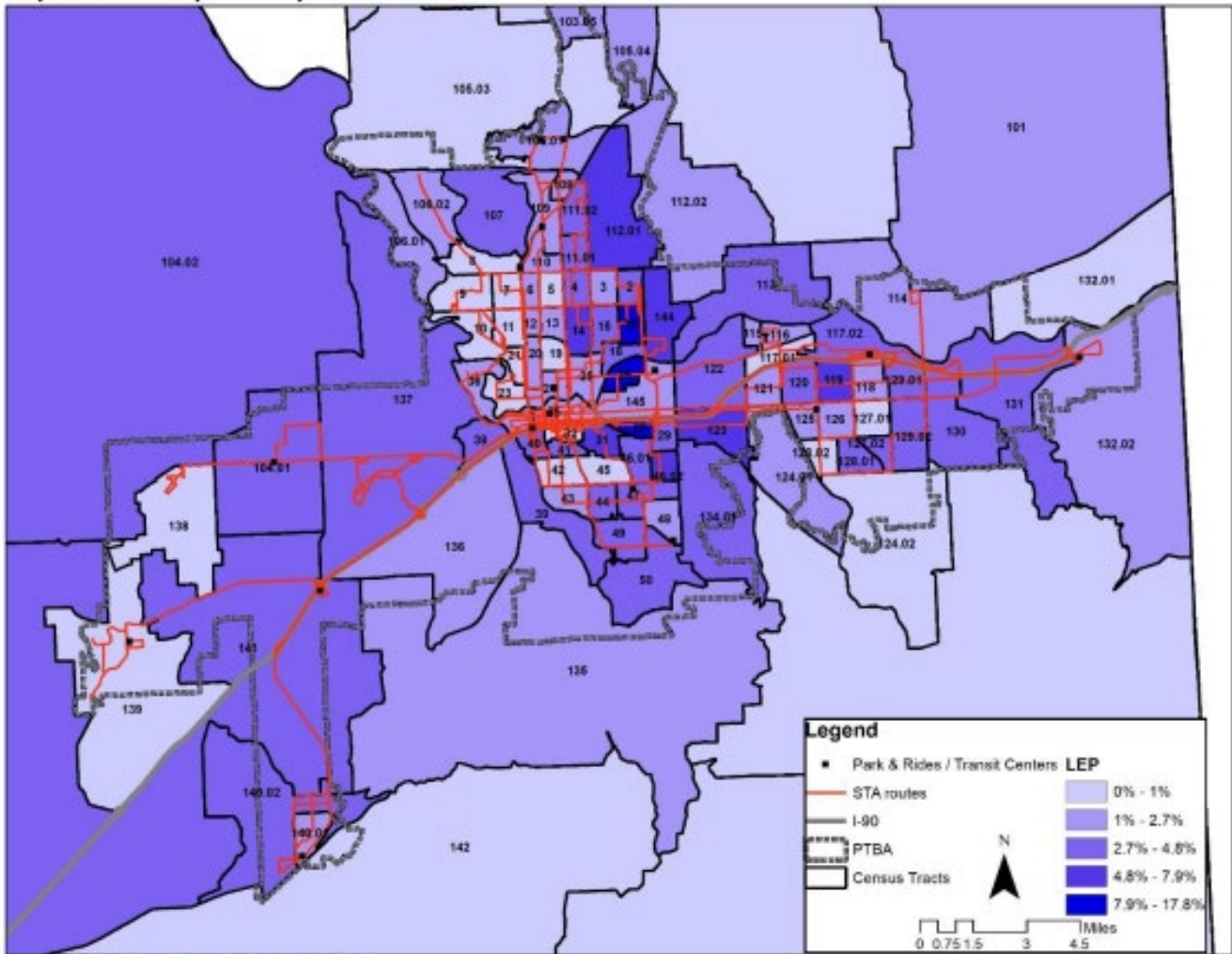
Census Tract	Population 5 Years and Over		
	Speak English less than "very well"		
	Total	Estimate	Percent
2	4,392	122	2.8%
3	4,610	86	1.9%
4	3,731	147	3.9%
5	3,127	13	0.4%
6	2,880	62	2.2%
7	4,249	24	0.6%
8	4,600	10	0.2%
9	6,011	56	0.9%
10	5,385	31	0.6%
11	3,204	14	0.4%
12	2,237	27	1.2%
13	3,171	73	2.3%
14	5,532	363	6.6%
15	4,952	189	3.8%
16	3,263	522	16.0%
18	2,475	105	4.2%
19	3,346	24	0.7%
20	3,722	49	1.3%
21	2,389	10	0.4%
23	5,292	12	0.2%
24	2,878	35	1.2%
25	8,000	88	1.1%
26	5,232	904	17.3%
29	2,636	129	4.9%
30	2,354	269	11.4%
31	4,402	273	6.2%
32	2,543	-	0.0%

Census Tract	Population 5 Years and Over		
	Speak English less than "very well"		
	Total	Estimate	Percent
35	2,314	46	2.0%
36	3,974	78	2.0%
38	1,552	70	4.5%
39	2,013	71	3.5%
40	4,593	133	2.9%
41	2,101	73	3.5%
42	4,315	23	0.5%
43	3,082	65	2.1%
44	4,061	131	3.2%
45	3,239	8	0.2%
46.01	3,431	158	4.6%
46.02	2,865	164	5.7%
47	6,390	191	3.0%
48	3,808	73	1.9%
49	5,369	171	3.2%
50	3,607	104	2.9%
101	5,880	119	2.0%
103.05	6,012	71	1.2%
104.01	6,569	267	4.1%
104.02	6,699	262	3.9%
105.01	7,902	205	2.6%
105.03	7,625	29	0.4%
105.04	3,195	87	2.7%
106.01	3,524	73	2.1%
106.02	7,601	183	2.4%
107	6,166	176	2.9%
108	1,957	35	1.8%
109	4,863	64	1.3%
110	3,428	53	1.5%
111.01	5,866	277	4.7%
111.02	3,995	184	4.6%
112.01	6,774	539	8.0%
112.02	3,963	74	1.9%
113	7,410	277	3.7%
114	5,680	71	1.3%
115	1,395	37	2.7%
116	1,556	26	1.7%
117.01	1,928	19	1.0%
117.02	5,657	238	4.2%
118	4,376	61	1.4%
119	3,921	219	5.6%
120	3,346	103	3.1%

Census Tract	Population 5 Years and Over			
	Speak English less than "very well"			
	Total	Estimate	Percent	
121	2,495	45	1.8%	
122	2,180	95	4.4%	
123	5,124	371	7.2%	
124.01	4,087	62	1.5%	
124.02	5,994	31	0.5%	
125	3,485	62	1.8%	
126	3,920	79	2.0%	
127.01	3,887	27	0.7%	
127.02	2,386	77	3.2%	
128.01	3,927	115	2.9%	
128.02	3,176	18	0.6%	
129.01	3,305	150	4.5%	
129.02	6,784	285	4.2%	
130	8,719	261	3.0%	
131	10,310	313	3.0%	
132.01	7,337	54	0.7%	
132.02	9,558	194	2.0%	
134.01	4,801	153	3.2%	
135	8,393	126	1.5%	
136	4,455	72	1.6%	
137	3,000	143	4.8%	
138	2,516	11	0.4%	
139	5,475	22	0.4%	
140.01	5,262	81	1.5%	
140.02	5,720	217	3.8%	
141	5,703	188	3.3%	
142	3,400	8	0.2%	
144	4,240	294	6.9%	
145	1,967	29	1.5%	
Total	432,221	12,528	2.9%	

Source 2013-2017 ACS 5-Year Estimates

Map 4 PTBA LEP Population by Census Tract



Source 2013-2017 ACS 5-Year Estimates

Data was collected at the county level to identify languages spoken by LEP populations. ACS data provided by the U.S. Census Bureau only includes this level of data until the year 2015. For this reason, STA will use the 2015 data listed below in Table 10 to examine the languages spoken by the LEP populations within Spokane County.

Table 10 Language Spoken at Home by Ability to Speak English

Spokane County, Washington			
	Total Estimate	Speak English "very well"	Speak English less than "very well"
Total	451,005		
Speak only English	415,680		
Spanish or Spanish Creole	9,807	7,177	2,630
Russian	7,683	3,913	3,770
Vietnamese	2,005	710	1,295
Other Slavic languages	2,024	1,011	1,013
German	1,701	1,425	276
Other Pacific Island languages	1,208	459	749
Chinese	1,163	492	671
French (incl. Patois, Cajun)	1,006	820	186
Arabic	871	409	462
Tagalog	848	413	435
Korean	731	285	446
Italian	727	673	54
Other Indo-European languages	697	494	203
Japanese	618	438	180
Serbo-Croatian	598	373	225
African languages	593	188	405
Other Indic languages	369	111	258
Mon-Khmer, Cambodian	354	215	139
Hindi	243	228	15
Other West Germanic languages	238	230	8
Hmong	227	173	54
Other Native North American languages	218	199	19
Scandinavian languages	180	153	27
Urdu	172	149	23
Thai	147	73	74
Laotian	143	143	0
Other Asian languages	141	53	88
Persian	137	35	102
Hungarian	131	116	15
Polish	107	96	11
Portuguese or Portuguese Creole	96	50	46
Greek	49	49	0
Hebrew	49	39	10
French Creole	19	11	8
Other and Unspecified languages	16	16	0
Yiddish	9	9	0
Armenian	0	0	0
Gujarati	0	0	0
Navajo	0	0	0

Input from Community Organizations

- Based on survey responses, the most common languages encountered by community organizations are Russian, Spanish, and Marshallese, followed by Ukrainian, Arabic, Vietnamese, Burmese/Chin/Karen, Swahili, Farsi, Somali, Korean, Nepali, Chinese, French, Thai, Kinyarwanda, Kirundi, Moldovan, and Bosnian.
- According to Spokane International Translation, the most translated languages from 2017-2019 were Spanish, Russian and Arabic, followed by Vietnamese, Marshallese, Karen Burmese, Farsi, Dari, and Chinese Mandarin.

Factor 2: The Frequency with Which LEP Individuals Come into Contact with a STA Program, Activity, or Service

Census Overview

The 2017 ACS 5-year estimates include data on main mode of commute to work among LEP and non-LEP populations. This data show that for the service area, 3.2% (6,585 out of 205,640) of total workers over the age of 16 are LEP. LEP workers aged 16 and over who commute to work mainly by transit represent .1% (226 out of 205,640) of total commuters aged 16 and up. Of all the LEP commutes in the service area, only 3.43% (226 out of 6,585) use public transit for their commute. Table 11 below shows percentages of LEP riders for each commute type.

Table 11 Means of Transportation to Work and Ability to Speak English

	PTBA	LEP Estimate within PTBA
	Estimate	# Persons
Workers 16 years and over	205,640	6,585
Car, truck, or van – drove alone	161,430	4,303
Car, truck, or van – carpooled	19,218	1,428
Public transportation (excluding taxicab)	5,514	226
Walked	5,702	176
Taxicab, motorcycle, bicycle, or other means	3,489	158
Worked at home	10,287	294

Source: U.S. Census Bureau, 2017 American Community Survey 5-Year Estimates. Table B08113: Means of Transportation to Work by Language Spoken at Home and Ability to Speak English.

Input from Community Organizations

- When asking service providers how much their LEP clients relied on transit service, 45.8% (33 out of 72) stated their clients relied on transit service “A lot”. 31.9% (23 out of 72) of responders said their clients relied on transit service “A moderate amount”. 18.1% (13 out of 72) stated “A little”. 4.2% (3 out of 72) stated “None at all”.

Additional Information

There were numerous requests for translation received during the 2017-2019 assessment period. In 2017 there were 52 requests for translation services, in 2018 there were 62 requests, and in 2019 there were 103 requests. The majority of these requests came from the Mobility Center, which is located in the downtown STA Plaza. The Mobility Center manages the Paratransit eligibility process and provides mobility training to seniors and persons with disabilities to help them gain more independence and confidence in riding the fixed route system. The other requests included Paratransit Reservations, Customer Service, Security, and the Ombudsman.

Route 20/33 may serve over one hundred Japanese students in a day. It should be noted that one of the main reasons that the Japanese students attend Mukagawa Fort Wright Institute is to expand their English speaking abilities. In most communications with LEP persons on the bus, the passenger usually brings a map, either printed or on a smartphone, showing their destination. STA security estimates that they require language assistance about 3 times per year when dealing with LEP populations.

Factor 3: The Nature and Importance of the Program, Activity, or Service Provided by Spokane Transit Authority to the LEP Community

Description of Services

As a regional public transportation agency, Spokane Transit Authority provides vital connections between residents and employers, educational institutions, medical centers, shopping malls, intermodal transportation centers such as the Spokane International Airport, and Fairchild Air Force Base. Serving downtown Spokane, Spokane Valley, and five other cities within the PTBA, Spokane Transit operates within an area encompassing approximately 248 square miles and 436,261 residents, or 84.7% of the county population (based on Washington State Office of Financial Management 2019 PTBA population estimates and April 2019 county population estimates).

In addition to fixed route services, STA provides ADA Paratransit and Vanpool services. Paratransit is door-to-door service provided within a defined service area, during fixed route operating hours, to eligible individuals whose disability prevents them from using fixed route bus service. Vanpool (Rideshare) service augments STA's public transportation system through the assignment of passenger vans to vanpool groups.

Input from Community Organizations

- When asking service providers how much their LEP clients relied on transit service, 45.8% (33 out of 72) stated their clients relied on transit service "A lot". 31.9% (23 out of 72) of responders said their clients relied on transit service "A moderate amount". 18.1% (13 out of 72) stated "A little". 4.2% (3 out of 72) stated "None at all".
- When asked if LEP clients ever express difficulty using transit service, 47 out of 69 or 68.1% of survey responders said "Yes". Meanwhile, 21 out of 69 or 30.4% said "No". There is no way to determine if the difficulty is related to their ability to speak English or other difficulties related to accessing transit.

Factor 4: The Resources Available to Spokane Transit Authority and Overall Costs

This step allows STA to weigh the demand for language assistance against its current and projected financial and personnel resources. This analysis will help determine if the language services it currently provides are cost effective and should also help plan future investments that will provide the most needed assistance to the greatest number of LEP persons within the limits of STA resources.

Resources Currently Available

- Spokane Transit website is translatable with Google Translate.
- At least one Customer Service employee is fluent in Spanish.
- STA's Mobility Training program can use telephonic interpreters when teaching an LEP person to ride the bus.
- STA contracts with CTS LanguageLink to provide telephone interpretation. These services are used by the Mobility Center, Paratransit Reservations, Security, Customer Service, and the Ombudsman.
- STA contracts with Prisma International to provide written translation services upon request of an individual. These services are also used when the agency is doing targeted written outreach.
- The Ombudsman provides training to fixed-route and paratransit operators, security, and customer service representatives on how to assist LEP persons that require language assistance.
- Mobility trainers conduct outreach to organizations such as World Relief to assist staff and clients in learning how to use the fixed-route system.

Costs

- A number of local organizations serve LEP populations in a variety of ways including translation, ESL education, networking, job training, housing and other basic services.
- The cost for telephonic translations from CTS LanguageLink is \$0.6231 per minute
- For written translation through Prisma International, the pricing varies depending on the type of document it is and whether the language is considered a "principal language". The contract lists the primary languages. Other languages that are not principle will have a slightly higher charge.
- For the period January 1, 2017 through December 31, 2019 the total cost for translation service (both written and verbal) was \$4,628.85.

Determination of LEP Assistance Needed

Within the STA service area, LEP persons represent 2.9% of the total population. Of that LEP population, 3.4% commute mainly by transit. STA estimates that for the LEP population within the service area, 46% rely on transit service a lot, while 31.9% rely on transit a moderate amount. Based upon these findings, STA has concluded that extensive outreach to LEP populations provides minimal results. There are few LEP people within the STA service area, and only a small portion of them use public transit.

Plan for Assisting Persons of Limited English Proficiency

This plan we created in accordance with the determination of LEP assistance required with the STA service area based upon the findings of the Four-Factor Analysis. Below are strategies STA may use when assisting persons of limited-English ability.

Targeted notifications to LEP organizations

Depending on the scope of the project and the populations involved STA may do any of the following:

- Send updated information concerning fare changes or major service changes to community organizations (as identified in the distribution list) that have contact with LEP persons.
- Update the distribution list as needed.
- Send surveys to community organizations inquiring about the demographics of and the services provided to LEP persons.
- Work with community organizations to distribute STA information in needed languages.

Language Assistance Measures

The language assistance notice will be posted at the Plaza and the STA website, and on all fixed route coaches and paratransit vans. Notice of translation service will be provided in Spanish, Russian, and Vietnamese, the three identified “Safe Harbor” languages. An example of the language assistance notice is:

If information is needed in another language, contact (509) 325-6094.

Si necesita información en otro idioma, comuníquese al (509) 325-6094.

Для получения информации на другом языке звоните по тел. (509) 325-6094.

Nếu quý vị cần thông tin bằng một ngôn ngữ khác, xin vui lòng gọi số (509) 325-6094.

Language Translation Upon Request

The STA Ombudsman will make STA plans, forms, and other documents available in languages requested by an LEP individual. STA will work with a translator if language assistance is needed for oral communication.

Below is copy of the “Point to your language” poster that is used by customer service as a tool to assist people needing translation service (Figure 1).

After learning the language needed, customer service will contact CTS LanguageLink for translation services.

Figure 1 Point to your language poster

TRUSTEDMULTILINGUALCOMMUNICATION

Point to your language

Amharic አማርኛ	Hebrew עברית	Portuguese Português
Arabic العربية	Hindi हिन्दी	Punjabi ਪੰਜਾਬੀ
Bosnian (Serbo-Croatian) Bosanski	Hmong Hmoob	Romanian Română
Burmese မြန်မာစာ	Italian italiano	Russian Русский
Cambodian ខ្មែរ	Japanese 日本語	Somali Soomaali
Cantonese 廣東話	Korean 한국어	Spanish Español
Haitian Creole Kreyòl Ayisyen	Kirundi Ikirundi	Swahili Kiswahili
Farsi فارسی	Korean 한국어	Tagalog Tagalog
French Français	Laotian ພາສາລາວ	Thai ภาษาไทย
French-Canadian français canadien	Mandarin 國語	Tigrinya ትግርኛ
German Deutsch	Nepali नेपाली	Urdu اردو
Turkish Türkçe	Polish Polski	Vietnamese Tiếng Việt

Over 240 languages 24/7/365

twitter.com/CTSlanguageLink
 facebook.com/ctslanguageLink
 Find us online: ctslanguageLink
 Telephone: 1.800.208.2620

CTS languageLink
 We speak your customer's language

Website Translation

The STA website is equipped with Google Translate software in order to assist LEP populations when navigating online. This software includes translation services for each of the Safe Harbor Languages listed in this plan.

Staff Training

The LEP Plan is available for all customer-facing employees in hard copy. This information will be part of the Spokane Transit staff orientation process for new customer-facing hires. Training topics include:

- STA's Title VI LEP policy and procedures;
- Language assistance offered by STA; and
- Procedures for accessing an interpreter.

Transit Operators are trained on STA's procedure for assisting LEP populations. This procedure includes the following:

- Be respectful.
- Use short simple sentences which are easier for the person speaking to you.
- Speak in single words which may help the customer.
- If you are talking through an interpreter, direct your conversation to the customer, not the interpreter.
- Don't pretend to understand if you have difficulty understanding a customer's speech, ask them to repeat the information, it may be important.
- Try visuals, have them write it down or point to a map. Be creative. Think charades.
- For language assistance refer to the Road Rules posting on the coach, behind the Driver's seat. Referring you to STA's Ombudsman at (509) 325-6094.
- If you need further assistance you may contact Dispatch, or if at the Plaza, direct them to Customer Service or Security for translation assistance.

Monitoring and Updating the LEP Plan

This plan is designed to be flexible and is one that can be easily updated. At a minimum, Spokane Transit will follow the Title VI program update schedule for the LEP plan.

Each update should examine all plan components such as:

- How many LEP persons were encountered?
- Were their needs met?
- What is the current LEP population in the service area?
- Has there been a change in the types of languages where translation services are needed?
- Is there still a need for continued language assistance for previously identified Spokane Transit programs?
Are there other programs that should be included?
- Has Spokane Transit's available resources, such as technology, staff, and financial costs, changed?
- Has Spokane Transit fulfilled the goals of the LEP plan?
- Were there any complaints received?

Safe Harbor Provision

According to the US Department of Justice's (DOJ) Safe Harbor Provision, adopted by US Department of Transportation (DOT), if a recipient of federal funds will provide written translation of vital documents for each LEP language group that constitutes five percent (5%) or 1,000 persons of the total population served by the agency, then such action will be considered strong evidence of compliance with the recipient's written translation obligations. As of the 2015 ACS 5-year estimates, Russian, Spanish and Vietnamese qualify as "Safe Harbor" languages in Spokane County. STA will consider these as "Safe Harbor" languages in Spokane's Public Transportation Benefit Area (PTBA).

Dissemination of the Spokane Transit Limited English Proficiency Plan

Spokane Transit will post the LEP plan on its website at www.spokanetransit.com.

An LEP person may obtain copies of the plan upon request. Any questions or comments regarding this plan should be directed to:

Community Ombudsman and Accessibility Officer
1230 W. Boone Avenue
Spokane, WA 99201
(509) 325-6094
TTY Relay 711
ombudsman@spokanetransit.com











21-01 Resolution-AdoptingSRHDTITLEVINon-DiscriminationPlan

Final Audit Report

2021-05-05


Created:	2021-04-21
By:	Ann Pitsnogle (lpitsnogle@srhd.org)
Status:	Signed
Transaction ID:	CBJCHBCAABAAGUv8VZnvgljy2h6Jk8sclJLLkbMVz5Ed

"21-01 Resolution-AdoptingSRHDTITLEVINon-DiscriminationPlan" History

-  Document created by Ann Pitsnogle (lpitsnogle@srhd.org)
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 Email viewed by Andrea Frostad (andieclimb@gmail.com)

2021-04-21 - 8:19:47 PM GMT- IP address: 66.249.84.219

 Email viewed by Jason Kinley (jkinleynd@gmail.com)


2021-04-21 - 8:49:11 PM GMT- IP address: 66.249.84.215

 Document e-signed by Jason Kinley (jkinleynd@gmail.com)

Signature Date: 2021-04-21 - 8:49:33 PM GMT - Time Source: server- IP address: 73.181.221.176

 Email viewed by Breean Beggs (bbeggs@spokanecity.org)

2021-04-21 - 11:54:01 PM GMT- IP address: 98.247.72.52

 Document e-signed by Breean Beggs (bbeggs@spokanecity.org)

Signature Date: 2021-04-21 - 11:54:14 PM GMT - Time Source: server- IP address: 98.247.72.52

 Email viewed by BETSY WILKERSON (bwilkerson@spokanecity.org)


2021-04-22 - 5:59:32 PM GMT- IP address: 198.1.39.252

 Document e-signed by BETSY WILKERSON (bwilkerson@spokanecity.org)

Signature Date: 2021-04-22 - 6:00:24 PM GMT - Time Source: server- IP address: 198.1.39.252

 Email viewed by Tim Hattenburg (thattenburg@spokanevalley.org)

2021-04-22 - 9:53:17 PM GMT- IP address: 73.239.214.10

 Document e-signed by Tim Hattenburg (thattenburg@spokanevalley.org)

Signature Date: 2021-04-22 - 9:53:54 PM GMT - Time Source: server- IP address: 73.239.214.10

 Email viewed by Karen Stratton (kstratton@spokanecity.org)


2021-04-23 - 3:07:02 PM GMT- IP address: 67.185.205.245

 Document e-signed by Karen Stratton (kstratton@spokanecity.org)

Signature Date: 2021-04-23 - 3:07:26 PM GMT - Time Source: server- IP address: 67.185.205.245

 Email viewed by Ben Wick (bwick@spokanevalley.org)

2021-04-28 - 3:48:24 PM GMT- IP address: 76.104.157.141

 Document e-signed by Ben Wick (bwick@spokanevalley.org)

Signature Date: 2021-04-28 - 3:49:13 PM GMT - Time Source: server- IP address: 76.104.157.141

 Email viewed by Andrea Frostad (andieclimb@gmail.com)

2021-05-05 - 1:16:17 AM GMT- IP address: 66.249.84.220

 Document e-signed by Andrea Frostad (andieclimb@gmail.com)

Signature Date: 2021-05-05 - 1:17:12 AM GMT - Time Source: server- IP address: 174.31.115.199

 Agreement completed.

2021-05-05 - 1:17:12 AM GMT