



## Transportation Programs Title VI Plan April 2021

Pierce County Human Services (PCHS) transportation programs are responsible for planning, coordinating, developing, and implementing transportation options for residents in Pierce County who have no or limited access to public transportation services, or the available service does not meet their needs. This includes providing informational outreach and education, developing local transit-human services plans and offering direct transportation services.

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. PCHS is committed to ensuring that no person is excluded from participation in or denied the benefits of its transportation 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.

### **Authorities**

Title VI of the Civil Rights Act of 1964, 42 U.S.C

Federal Transit Laws, Title 49, United States Code, Chapter 53

49 CFR 1.51

49 CFR part 21

28 CFR 42.401

### **Title VI Complaint Process**

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 contain 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 you deem significant.

Instructions and a complaint form in both English and Spanish are available at: [Pierce County Title VI Notice to the Public | Pierce County, WA - Official Website](#)

The complaint may also be filed in writing with the Pierce County Title VI Officer at the following address:

Pierce County Title VI Officer  
950 Fawcett Ave, Suite 100  
Tacoma, WA 98402

### **What happens after your complaint is submitted to the Pierce County Title VI Officer?**

All complaints alleging discrimination based on race, color or national origin in a service or benefit provided by PCHS transportation programs will be directly addressed by the Pierce County Title VI Officer. The Pierce County Title VI Officer shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. Additionally, Pierce County 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, Pierce County will contact you for details. Once sufficient information for investigating the complaint is received by Pierce County it will be thoroughly examined by the Pierce County Title VI Officer.

### **How you will be notified of the outcome of your complaint**

Pierce County will provide you with the results of the complaint you submitted and will advise you (complainant) of your right to appeal and/or 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 calendar days of receipt of the complaint, 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 (WSDOT)  
Public Transportation Division  
Attn: Title VI Coordinator  
PO Box 47387  
Olympia, WA 98504-7387

Federal Transit Administration Office of Civil Rights  
Attn: Title VI Program Coordinator  
East Building, 5<sup>th</sup> 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

### **Investigations, Complaints or Lawsuits**

PCHS Transportation Programs shall track and report any complaints received and report them to WSDOT on a quarterly basis. In addition, PCHS will track and report any complaints that develop into investigations or lawsuits. The information collected and reported includes, but is not limited to:

- Date of the complaint, investigation, or lawsuit filing;
- A summary of the allegations;
- The status of the complaint, investigation, or lawsuit filing;
- Actions taken by Pierce County; and
- Actions taken by other organizations to whom the complaint, investigation or lawsuit were forwarded to.

All documents will be retained for six years past the receipt of the completion of the complaint investigation.

### **Limited English Proficiency (LEP) Plan/Language Assistance Plan**

#### **1. PURPOSE**

PCHS Transportation Programs are 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 of

denials of service. 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.

According to the 2017 American Community Survey (ACS) data for Pierce County, English is spoken by 85.8% of households. Spanish speaking households account for 5.8% of all non-English speaking households, making it the most common language in Pierce County for LEP populations.

## 2. FOUR FACTOR ANALYSIS

- *Factor 1 – Number of LEP populations in the Service Area*

PCHS Transportation Programs cover all of Pierce County whose residents are largely English speaking. The most common Limited English Proficiency (LEP) languages in Pierce County according to <https://www.LEP.gov> are Spanish, Korean, Vietnamese, Russian and Mon-Khmer. Spanish is the largest single-language spoken in LEP households in Pierce County.

- Factor 2 – Frequency that LEP individuals come in contact with programs

All customer contact with PCHS Transportation Programs is via telephone or email, or by boarding a transit vehicle and communicating with the driver. In response to requests from Pierce County School districts, primary transportation program information is translated into Spanish for students and their families.

- Factor 3 – Importance of programs to LEP persons

The importance of PCHS Transportation Programs to LEP persons is generally considered equivalent or higher to other populations who access transportation services. LEP populations find it more difficult to receive information, services, and benefits in a timely and relevant manner, therefore ensuring materials are translated in the most needed languages will provide more transportation opportunities to clients.

- Factor 4 – Resources available to LEP recipients and costs

Spanish speaking representatives are generally available by phone for program information and trip reservations, but when an interpreter is not available in house, services are available via a contract with Cross Cultural Communications.

The transportation service brochure is available in Spanish.

There is no cost to the customer for any interpretation request.

## **IMPLEMENTATION PLAN**

PCHS Transportation Program has implemented its LEP/Language Assistance Plan and will review it annually, including contacts with LEP persons to determine the frequency of contacts, the language used, and how the contacts were handled.

The implementation plan is as follows:

- PCHS Transportation Programs will identify LEP persons in the service area by: Checking census tract records to analyze the percentage of the population who speak English less than very well in Pierce County.
- PCHS Transportation Programs will track requests for translation services, including information about the frequency of LEP contacts, the language used and how the request was handled.
- PCHS Transportation Programs will maintain the Google feature to translate information in the appropriate language on its website.
- PCHS Transportation Programs will engage Pierce County Aging and Disability Resources to access the contract with an interpreter and to provide access to telephonic interpreter services such as with Cross Cultural Communications.
- PCHS Transportation Programs will inform the public about the availability of translation services on its website using Google Translate and also by phone when staff cannot speak the requested language.

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

In order to comply with 49CFR 21.9(d), Pierce County Human Services transportation program and its contractors must provide information to beneficiaries regarding their Title VI obligations and inform beneficiaries of the protections against discrimination given to them by Title VI.

The Pierce County Title VI Notice to the Public is available on the transportation program website [www.piercecountywa.gov/btb](http://www.piercecountywa.gov/btb). This information will also be added to all brochures and outreach material as updates are made and existing supplies are depleted.

## **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 PCHS transportation programs.

PCHS transportation programs has engaged the public in its planning and decision-making processes, as well as its marketing and outreach activities. PCHS have developed a Public Participation Plan that address the goals and objectives for public participation as outlined below:

#### Mobility Management

PCHS transportation programs provide staff for the Pierce County Coordinated Transportation Coalition (PCCTC). The PCCTC is committed to identifying needs and gaps in Pierce County, to include seniors, persons with disabilities, persons with low incomes, and youth 12-17 and engages with all members of the community to provide information about transportation options and learning about unmet needs. The PCCTC is also represented at community events, job fairs, festivals, and other places where the public congregates to ensure reaching the most people possible.

#### Public Meetings

PCHS transportation programs regularly seek out and invite participation from minority and low-income populations during public outreach events and by ensuring that informational materials are distributed in a variety of locales where these populations can easily access them. The PCCTC is the local mobility Coalition that is staffed by PCHS transportation programs. Public meeting schedules and agendas for the PCCTC are posted on the Pierce County Website <https://www.piercecountywa.gov/4347/Pierce-County-Coordinated-Transp-Coaliti> and are advertised via an email distribution list prior to the meeting date. Social media is also employed to reach a larger audience to increase attendance. While in-person meetings are suspended, online meeting platforms such as Zoom are employed to ensure community access and participation.

#### Customer Comment/Complaint Process

Customers may submit a comment or complaint on the PCHS website, [Human Services | Pierce County, WA - Official Website](#) by sending a message or calling one of the Human Services offices listed. Public comment cards are also stocked on all contractor vehicles for riders to return to the driver or mail to the office.

#### Transportation Surveys

Comprehensive transportation surveys are developed to gather feedback from the community about their transportation needs. The survey is translated into the top five languages in Pierce County and is completed via an online format. In addition to the online option, surveys are available in paper format and the community can engage the 211 call center staff to assist them in completing the survey by phone. Invitations to participate in the survey will be mailed to residences, advertised online and in social media, or broadcast over an email distribution list.

Invitations to participate are also delivered during meetings hosted by community partners to ensure that the largest representation of the community is reached, and their voices heard.

A comprehensive transportation survey will be released in April 2021 and will provide input for PCCTC's 2021-2025 Coordinated Transit-Human Services Transportation Plan which outlines strategic transportation goals of the Coalition and is updated every five years.

### **Membership of Non-Elected Committees**

PCHS transportation services strive to select representation for the PCCTC from low-income, minority and LEP populations within our service area when developing the Coordinated Transit-Human Services Transportation Plan and its associated strategy work teams and committees. PCHS solicits volunteers from multiple outreach modes, presentations and word of mouth to ensure interested parties from all demographics are represented in the coordinated efforts to close transportation gaps in Pierce County. These informal committees are on an ad hoc basis and membership changes with the specific needs of the PCCTC.