

**ASOTIN COUNTY PTBA
TITLE VI POLICY
POLICY NO. P16-102**

Effective: March 22, 2016

Introduction

This program reflects Asotin County PTBA's (PTBA) commitment to ensuring that no person shall, on the grounds of race, color, national origin, religion, age, marital status, sexual orientation, or disability be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity provided by the PTBA.

Signed Policy Statement

A policy statement signed by the General Manager assuring the PTBA's compliance with Title VI of the Civil Rights Act of 1964 can be found in Attachment A.

Title VI Complaint Procedures

Asotin County PTBA has a standard process for investigation all complaints. Members of the public may file a signed, written complaint up to one hundred and eighty (180) days from the date of alleged discrimination. Full procedures for filing a complaint and the PTBA's procedures for investigating complaints can be found as Attachment B. At a minimum, the complaint should include the following information:

- Name, mailing address, and how to contact complainant (i.e. telephone number, e-mail, address, etc.)
- How, when, where, and why complainant alleges they were discriminated against. Include the location, names and contact information of any witnesses.
- Other significant information.

The complaint may be filed in writing to the PTBA at the following address:

Asotin County PTBA
Attn: General Manager
1494 Poplar Street
Clarkston, WA 99403

In Person: 1494 Poplar Street, Clarkston, WA
By phone: 509-758-3567
By fax: 509-758-3594

Record of Title VI investigations, complaints, or lawsuits

Over the reporting period, Asotin County PTBA has had no Title VI complaints, investigations, or lawsuits filed against it.

Limited English Proficiency Plan

A full copy of Asotin County PTBA's Limited English Proficiency Plan can be found in Attachment C.

Notification of Title VI obligations

Asotin County PTBA publicizes its Title VI program by posting its commitment to providing services without regard to race, color, or national origin at their offices which are located at 1494 Poplar Street, Clarkston, WA and on all the transit buses. The PTBA also provides information regarding their obligations on the website. A copy of this notice can be found in Attachment D.

Subrecipients

Asotin County PTBA, the primary recipient, does not currently have any subrecipients. However, if in the future, Asotin County PTBA will award funds to a subrecipient, Asotin County PTBA will ensure the subrecipient will comply with Title VI regulations, as well as maintain a schedule of subrecipient Title VI program submissions.

Equity Analysis of Construction Projects

Over the last three years, Asotin County PTBA did not complete a construction project using FTA funding that required an environmental assessment (EA) or environmental impact statement (EIS). In the event that FTA funds are used for a project that requires

an environmental justice analysis, the PTBA will integrate the following components into the EA or EIS:

- a. A description of the low-income and minority population within the study area affected by the project, and a discussion of the method used to identify this population (e.g., analysis of Census data, minority business directories, direct observation, or a public involvement process).
- b. A discussion of all adverse effects of the project both during and after construction that would affect the identified minority and low-income population.
- c. A discussion of all positive effects that would affect the identified minority and low-income population, such as an improvement in transit service, mobility, or accessibility.
- d. A description of all mitigation and environmental enhancement actions incorporated into the project to address the adverse effects, including, but not limited to, any special features of the relocation program that go beyond the requirements of the Uniform Relocation Act and address adverse community effects such as separation or cohesion issues; and the replacement of the community resources destroyed by the project.
- e. A discussion of the remaining effects, if any, and why further mitigation is not proposed.
- f. For projects that traverse predominantly minority and low-income and predominantly non-minority and non-low-income area, a comparison of mitigation and environmental enhancement actions that affect predominantly low-income and minority areas with mitigation implemented in predominantly non-minority or non-low-income areas. If there is no basis for such a comparison, it shall be described why that is so.

Summary of Public Participation Efforts

Asotin County PTBA has nothing to report for public participation efforts at this time. This is due to the very limited number of LEP persons within our service area and the lack of complaints received by staff.

Summary of Minority Representation on Planning and Advisory Bodies

Asotin County PTBA has no such committees.

Service Area

Asotin County PTBA's service area is located in the City of Clarkston and City of Asotin and connects with Lewiston Transit at the Lewiston Community Center in Lewiston, Idaho. During peak service we operate five vehicles. Asotin County PTBA is a UZA of under 200,000 and we no longer pass funds through sub-recipients.

System Wide Service Standards

- **Vehicle Load Standards**

During peak hours our fixed route buses are transporting passengers at a maximum capacity of 75% and a low capacity of 25%.

ADA Paratransit buses operate at a maximum capacity of 20% at peak hours and 10% at non-peak hours.

- **Vehicle Headway Standards**

Asotin County PTBA operates (6) ½ hour routes in the city of Clarkston and Asotin 12 times a day, Monday through Fridays, 6:00 a.m. – 6:00 p.m. There is currently no service on the weekends.

- **Vehicle On-time Performance**

Ninety-nine (99) percent of Asotin County PTBA transit vehicles will complete their established runs no more than 5 minutes early or late in comparison to the established schedule.

- **Service Availability**

Asotin County PTBA provides the following services to public transportation facilities with connection from the City of Clarkston and Asotin routes.

The Nez Perce County Regional Airport located in Lewiston, ID.

Garfield County Outreach, based in Pomeroy, provides twice weekly shuttle service to the Clarkston/Lewiston Valley area. From there, passengers are able to connect with Asotin County PTBA's fixed route services at the Lewiston Community Center in Lewiston, Idaho once an hour.

Many medical facilities and skilled nursing facilities in Asotin County and surrounding area use the Asotin County PTBA' Paratransit service as their method for transporting clients and patients, in addition to their fleet of shuttle buses.

The Asotin County PTBA service connects with Lewiston Transit System at the Lewiston Community Center.

Appaloosa Express is a fixed route service that provides public transportation from the Nez Perce Reservation in Lapwai, Idaho. This service travels to other Idaho towns including Culdesac, Orofino, Lenore, Kamiah, Kooskia, and Lewiston. From Lewiston, Idaho, passengers are able to take advantage of fixed route services that Asotin County PTBA provides.

- **Transit Amenities**

Asotin County PTBA has bus shelters, bike racks, and solar lights along the fixed routes for our passengers.

- **Vehicle Assignment**

Vehicles are assigned to the Fixed Route and to the Paratransit service. These buses will not exceed five years of use. A Low floor bus is used for our Paratransit service; this is very useful when we have three or more wheelchairs at one stop. This bus carries a higher share of our ADA ridership.

Our Green Line fixed route has the lowest ridership; it is assigned a smaller cutaway bus. The Blue Line and Red Line routes have the highest ridership so they are each assigned a 30-foot bus.

Attachment A

**Asotin County PTBA
Title VI
Non-Discrimination - Policy Statement**

Asotin County PTBA is committed to ensuring that no person is excluded from participation in, or denied the benefits of, or be subject to discrimination in the receipt of its services or programs on the basis of race, color or national origin or any other characteristics protected by law, including Title VI of the Civil Rights Act of 1964, as amended. Further, under the Americans with Disabilities Act (ADA) of 1990, no entity shall discriminate against an individual with a physical or mental disability in connection with the provision of transportation service.

To obtain more information on Asotin County PTBA's nondiscrimination obligations or to file a Title VI complaint, contact the General Manager at:

Asotin County PTBA
Attn: General Manager
1494 Poplar Street
Clarkston, WA 99403

In Person: 1494 Poplar Street, Clarkston, WA
By phone: 509-758-3567
By fax: 509-758-3594

You may file a written complaint no later than 180 calendar days after the date of the alleged discrimination.

Jenny George

Jenny George
Acting General Manager

Attachment B

Discrimination Complaint Procedure

1. Any person who believes that he or she, individually, as a member of any specific class, or in connection with any disadvantaged business enterprise, has been subjected to discrimination prohibited by Title VI of the Civil Rights Act of 1964, the American with Disabilities Act of 1990, Section 504 of the Vocational Rehabilitation Act of 1973 and the Civil Rights Restoration Act of 1987, as amended, may file a complaint with Asotin County PTBA. A complaint may also be filed by a representative on behalf of such a person.
2. The complaint must meet the following requirements:
 - a. Complaint shall be in writing and signed by the complainant(s). In cases where the complainant is unable or incapable of providing a written statement, a verbal complaint may be made. If necessary, the Transit Attorney will assist the person in reducing the complaint to writing and submit the written version of the complaint to the person for signature.
 - b. Include the date of the alleged act of discrimination date when the complainant became aware of the alleged act of discrimination; or the date on which that conduct was discontinued or the latest instance of conduct.
 - c. Present a detailed description of the issues, including names and job titles of those individuals perceived as parties in the complaint.
 - d. Federal and state law requires complaints be filed within 180 calendar days of the alleged incident.
3. Within 10 days of receipt of the complaint, the Transit Attorney will determine its jurisdiction, acceptability, and/or need for additional information. The complainant will be provided with a written acknowledgement that Asotin County PTBA has either accepted or rejected the complaint.
4. A complaint may be dismissed for the following reasons:
 - a. The complainant requests the withdrawal of the complaint.
 - b. The complainant fails to respond to requests for additional information needed to process the complaint.
 - c. The complainant cannot be located after reasonable attempts.
5. Within 60 days, the Transit Attorney will conduct an investigation of the allegation and based on the information obtained, will render a recommendation for action in a report of findings to the General Manager. The complaint should be resolved by informal means whenever possible. Such information attempts and their results will be summarized in the report of findings.
6. Within 90 days of receipt of the complaint, the General Manager will notify the complainant in writing of the final decision reached, including the proposed disposition of the matter. The notification will advise the complainant of his/her appeal rights with the appropriate Federal or State agency, if they are dissatisfied with the final decision rendered by Asotin County PTBA.

- a. Asotin County PTBA will reconsider this determination if new facts come to light.
 - b. If complainant is dissatisfied with the determination and/or resolution set forth by Asotin County PTBA, the same complaint may be submitted to the appropriate Federal or State agency for investigation.
7. The Transit Attorney will also provide the appropriate Federal or State agency with a copy of the decision and summary of findings upon completion of the investigation within 120 days of the receipt of the complaint.
8. Contacts for the different Title VI administrative jurisdictions are as follows:

WSDOT
Office of Equal Opportunity
External Civil Rights Program
P.O. Box 47314
310 Maple Park
Olympia, WA 98504-7314
Ph: 360-705-7090
Fax: 360-705-6801

Federal Transit Administration Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, 5th Floor - TCR
1200 New Jersey Ave., SE
Washington, DC 20590

Seattle Regional office of FHEO
U.S. Department of Housing and Urban Development
Seattle Federal Office Building
909 First Avenue, Room 205
Seattle, WA 98104-1000



**Asotin County PTBA
Limited English Proficiency Plan
Updated: March 2016**

I. Introduction

This *Limited English Proficiency Plan (LEP)* has been prepared to address Asotin County PTBA's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

Executive Order 13166, titled *Improving Access to Services for Persons with Limited English Proficiency*, indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each agency to publish guidance for its respective recipients clarifying their obligation to ensure to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds, including all Asotin County PTBA departments receiving federal grant funds.

II. Plan Summary

The Asotin County PTBA has developed this *Limited English Proficiency Plan* to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, rite or understand English. This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

In order to prepare this plan, Asotin County PTBA used the four-factor LEP analysis, which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served by Asotin County PTBA.

2. The frequency with which LEP persons come in contact with Asotin County PTBA service.
3. The nature and importance of services provided by Asotin County PTBA to the LEP population.
4. The interpretation services available to Asotin County PTBA and overall cost to provide LEP assistance. A summary of the results of the four-factor analysis is in the following section.

III. **Meaningful Access: Four-Factor Analysis**

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

Task 1, Step 1: Examine prior experiences with LEP individuals

There is no large geographic concentration of any type of LEP individuals in the service area for Asotin County PTBA. As to transit, as of this date we have not had any LEP individuals that we have transported.

Task 1, Step 2: Become familiar with data from the U.S. Census

The 2010-2014 American Community Survey (ACS) describes the languages spoken in Asotin County/Lewis Clark Valley MPO (LCVMPO) and number speaking each language as follows:

LCVMPO

	Estimate
Total:	50,058
Speak only English	48,285
Spanish or Spanish Creole:	853
French (incl. Patois, Cajun):	64
Italian:	23
Portuguese or Portuguese Creole:	31
German:	206
Yiddish:	0
Other West Germanic languages:	99
Scandinavian languages:	4
Russian:	48
Other Slavic languages:	5
Persian:	3
Other Indic languages:	89
Other Indo-European languages:	18
Chinese:	143

Japanese:	19
Korean:	34
Thai:	17
Vietnamese:	5
Tagalog:	16
Other Pacific Island languages:	12
Other Native North American languages:	77
Arabic:	4
African languages:	3

Task 1, Step 2A: Identify the geographic boundaries of the area that your agency serves

Asotin County PTBA’s service area is defined by the Urbanized Area (UZA) Boundary directed by the United States Census. Although Asotin County PTBA’s fixed routes are within the boundaries of the City of Clarkston and the City of Asotin, we recognize that the individuals that utilize our service also live in the City of Lewiston. Therefore, this report was done for the Lewis Clark Valley UZA.

Task 1, Step 2B: Obtain Census data on the LEP population in your service area

LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER – Universe: POPULATION 5 YEARS AND OVER
 Data Set: 2010-2014 American Community Survey 5 Year Estimates
 Survey: American Community Survey

NOTE: Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau’s Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

**Asotin County, Washington
2010-2014**

People	Asotin County, WA
<i>Population</i>	
Population estimates, July 1, 2015, (V2015)	NA
Population estimates, July 1, 2014, (V2014)	22189
Population estimates base, April 1, 2010, (V2015)	NA
Population estimates base, April 1, 2010, (V2014)	21623
Population, percent change - April 1, 2010 (estimates base) to July 1, 2015, (V2015)	NA
Population, percent change - April 1, 2010 (estimates base) to July 1, 2014, (V2014)	2.6
Population, Census, April 1, 2010	21623
<i>Age and Sex</i>	
Persons under 5 years, percent, July 1, 2014, (V2014)	5.4
Persons under 5 years, percent, April 1, 2010	5.8
Persons under 18 years, percent, July 1, 2014, (V2014)	21.0
Persons under 18 years, percent, April 1, 2010	21.8
Persons 65 years and over, percent, July 1, 2014, (V2014)	20.9
Persons 65 years and over, percent, April 1, 2010	19.3
Female persons, percent, July 1, 2014, (V2014)	51.8
Female persons, percent, April 1, 2010	51.7
<i>Race and Hispanic Origin</i>	
White alone, percent, July 1, 2014, (V2014) (a)	94.4
White alone, percent, April 1, 2010 (a)	94.3
Black or African American alone, percent, July 1, 2014, (V2014) (a)	0.6
Black or African American alone, percent, April 1, 2010 (a)	0.4
American Indian and Alaska Native alone, percent, July 1, 2014, (V2014) (a)	1.6
American Indian and Alaska Native alone, percent, April 1, 2010 (a)	1.4
Asian alone, percent, July 1, 2014, (V2014) (a)	0.9
Asian alone, percent, April 1, 2010 (a)	0.5
Native Hawaiian and Other Pacific Islander alone, percent, July 1, 2014, (V2014) (a)	0.2
Native Hawaiian and Other Pacific Islander alone, percent, April 1, 2010 (a)	0.2
Two or More Races, percent, July 1, 2014, (V2014)	2.4
Two or More Races, percent, April 1, 2010	2.4
Hispanic or Latino, percent, July 1, 2014, (V2014) (b)	3.6
Hispanic or Latino, percent, April 1, 2010 (b)	3.0
White alone, not Hispanic or Latino, percent, July 1, 2014, (V2014)	91.3
White alone, not Hispanic or Latino, percent, April 1, 2010	92.6
<i>Population Characteristics</i>	
Veterans, 2010-2014	2507
Foreign born persons, percent, 2010-2014	1.7
<i>Housing</i>	

Housing units, July 1, 2014, (V2014)	9843
Housing units, April 1, 2010	9872
Owner-occupied housing unit rate, 2010-2014	67.1
Median value of owner-occupied housing units, 2010-2014	170000
Median selected monthly owner costs -with a mortgage, 2010-2014	1217
Median selected monthly owner costs -without a mortgage, 2010-2014	371
Median gross rent, 2010-2014	681
Building permits, 2014	35
<i>Families and Living Arrangements</i>	
Households, 2010-2014	9405
Persons per household, 2010-2014	2.30
Living in same house 1 year ago, percent of persons age 1 year+, 2010-2014	82.0
Language other than English spoken at home, percent of persons age 5 years+, 2010-2014	3.6
<i>Education</i>	
High school graduate or higher, percent of persons age 25 years+, 2010-2014	88.7
Bachelor's degree or higher, percent of persons age 25 years+, 2010-2014	18.5
<i>Health</i>	
With a disability, under age 65 years, percent, 2010-2014	13.3
Persons without health insurance, under age 65 years, percent	14.7
<i>Economy</i>	
In civilian labor force, total, percent of population age 16 years+, 2010-2014	55.9
In civilian labor force, female, percent of population age 16 years+, 2010-2014	54.6
Total accommodation and food services sales, 2007 (\$1,000) (c)	22983
Total health care and social assistance receipts/revenue, 2007 (\$1,000) (c)	84321
Total manufacturers shipments, 2007 (\$1,000) (c)	FN(1)
Total merchant wholesaler sales, 2007 (\$1,000) (c)	D
Total retail sales, 2007 (\$1,000) (c)	208856
Total retail sales per capita, 2007 (c)	9867
<i>Transportation</i>	
Mean travel time to work (minutes), workers age 16 years+, 2010-2014	15.4
<i>Income and Poverty</i>	
Median household income (in 2014 dollars), 2010-2014	42689
Per capita income in past 12 months (in 2014 dollars), 2010-2014	24836
Persons in poverty, percent	16.3
<i>Businesses</i>	
Total employer establishments, 2013	431
Total employment, 2013	4559
Total annual payroll, 2013	143283
Total employment, percent change, 2012-2013	-1.0
Total nonemployer establishments, 2013	1061
All firms, 2007	1456

Men-owned firms, 2007	617
Women-owned firms, 2007	248
Minority-owned firms, 2007	S
Nonminority-owned firms, 2007	1352
Veteran-owned firms, 2007	205
Nonveteran-owned firms, 2007	1130
Geography	Asotin County, WA
Population per square mile, 2010	34.0
Land area in square miles, 2010	636.21
FIPS Code	"53003"
This geographic level of poverty and health estimates are not comparable to other geographic levels of these estimates	
Some estimates presented here come from sample data, and thus have sampling errors that may render some apparent differences between geographies statistically indistinguishable. Click the Quick Info  icon to the left of each row in TABLE view to learn about sampling error.	
The vintage year (e.g., V2015) refers to the final year of the series (2010 thru 2015). Different vintage years of estimates are not comparable.	
(1) Data may be subject to publication minimums that vary by industry and geography.	
(a) Includes persons reporting only one race	
(b) Hispanics may be of any race, so also are included in applicable race categories	
(c) Economic Census - Puerto Rico data are not comparable to U.S. Economic Census data	
D: Suppressed to avoid disclosure of confidential information	
F: Fewer than 25 firms	
FN: Footnote on this item in place of data	
NA: Not available	
S: Suppressed; does not meet publication standards	
X: Not applicable	
Z: Value greater than zero but less than half unit of measure shown	
QuickFacts data are derived from: Population Estimates, American Community Survey, Census of Population and Housing, Current Population Survey, Small Area Health Insurance Estimates, Small Area Income and Poverty Estimates, State and County Housing Unit Estimates, County Business Patterns, Nonemployer Statistics, Economic Census, Survey of Business Owners, Building Permits.	

Task 1, Step 2C: Analyze the data you have collected

Non-proficiency is determined by adding those who speak English in any category other than very well. In the Lewis Clark Valley Metropolitan (LCVMPO) area, a total of 411 persons (0.82%) are identified with limited English proficiency. Of these individuals, 218 (53% of the LEP population) speak Spanish, 58 (14.1%) speak German, 35 (8.5%) speak Chinese, 28 (6.8%) speak French, 20 (4.9%) speak Russian, 17 (4.1%) speak Thai, 14 (3.4%) speak Other Native North American languages, 10 (2.4%) speak Other Indo-European languages, 5 (1.2%) speak Other Slavic languages, 3 (0.7%) speak Other Pacific Island languages, and 3 (0.7%) speak Persian..

Task 1, Step 2D: Identify any concentration of LEP persons within your service area

There is no large geographic concentration of any type of LEP individuals in the service area of the LCVMPO.

Task 1, Step 3: Consult state and local sources of data

Asotin County is considered to be a part of Eastern Washington. According to the United States Department of Labor website, 86.2% of persons in Eastern Washington speak only English. Of the 9,070 individuals who speak another language other than English, 2,285 do not speak English “well” or “very well”. *Source:* <http://www.doleta.gov/reports/CensusData/download.cfm>

Task 1, Step 4: Reach out to community organizations that serve LEP persons

The overwhelming majority of the population, 96.9%, speak only English. As a result, there are few social, service, professional and leadership organizations within Asotin County PTBA/LCVMPO service area that focus on outreach to LEP individuals. However, Lewis Clark State College, located in the City of Lewiston, Idaho, has an International Programs Office, which houses the Institute of Intensive English (I.I.E) where individuals learn English as a second language.

Factor 2: The frequency with which LEP Individuals come into contact with your programs, activities, and services

Task 2, Step 1: Review the relevant programs, activities, and services you provide

Asotin County PTBA and staff are most likely to encounter LEP individuals through office visits, phone conversations, notifications from staff of impacts on County services and attendance at various County meetings. LEP individuals may also use the PTBA’s

transit system through the fixed route or ADA paratransit system. Contact with transit would be through dispatch, administrative offices, or bus drivers. To date, Asotin County PTBA has had no requests for interpreters and no requests for translated program documents. The Asotin County PTBA Board and office staff have had very little contact with LEP persons.

Task 2, Step 2: Review information obtained from community organizations

The only service thus far that the PTBA has encountered a possible LEP individual is on transit. The fixed route drivers have indicated that groups of students will occasionally get on the bus to go shopping. These students appear very comfortable using public transportation, as it is widely used in the bigger cities of other countries.

Task 2, Step 3: Consult directly with LEP persons

PTBA personnel have not yet had the opportunity to consult directly with LEP persons.

Factor 3: The importance to LEP persons of your program, activities, and services

Task 3, Step 1: Identify your agency's most critical services

The most critical services in Asotin County PTBA to an LEP individual would be 1) the ability to access emergency personnel, 2) the ability to contact PTBA personnel for non-emergency services such as utilities and 3) the ability to access public transportation.

Factor 4: The resources available to the recipient and costs

Task 4, Step 1: Inventory language assistance measures currently being provided, along with associated costs

In 2009, Asotin County PTBA opened a Personal Interpreter account with Language Line Services for translation services. The cost of this service is billed when it is used. To date, it has not been necessary to use the service.

Task 4, Step 2: Determine what, if any additional services are needed to provide meaningful access

Due to the majority of the population speaking English "very well", and the fact that services have not been requested, it is determined that it is not necessary to provide any additional services at this time.

VI. LANGUAGE ASSISTANCE

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to Asotin County PTBA services. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language.

How Asotin County PTBA staff may identify an LEP person who needs language assistance:

- Post notice of LEP Plan and the availability of interpretation or translation services free of charge in languages LEP persons would understand.
- All PTBA staff will be provided with “I Speak” cards to assist in identifying the language interpretation needed if the occasion arises.
- All PTBA staff will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year.
- When the PTBA sponsors an informational meeting or event, a staff person may greet participants as they arrive. By informally engaging participants in conversation, it is possible to gauge each attendee’s ability to speak and understand English. Although translation may not be able to be provided at the event it will help identify the need for future events.

1. Language Assistance Measures

Although there is a very low percentage in Asotin County of LEP individuals, that is, persons who speak English “not well” or “not at all”, Asotin County PTBA will strive to offer the following measures:

- A. Asotin County PTBA staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communication English.
- B. The following resources will be available to accommodate LEP persons:
 - There are 3 languages that potentially could be equally encountered according to the Census: Spanish, Indo-European, and Asian-Pacific Island. For this reason, the “I Speak” cards will be used to determine the language and document sources would be translated at that point.
 - Language interpretation will be accessed for all languages through a telephone interpretation service.

VII. STAFF TRAINING

The following training will be provided to all staff:

- Information on the Title VI Policy and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of the “I Speak” cards and telephone interpretation service.
- Documentation of language assistance requests.
- How to handle a potential Title VI/LEP complaint.

All contractors or subcontractors performing work for Asotin County PTBA will be required to follow the Title VI/LEP guidelines.

VIII. TRANSLATION OF DOCUMENTS

The Asotin County PTBA weighed the cost and benefits of translating documents for potential LEP groups. Considering the expense of translating the documents, the likelihood of frequent changes in documents, there is no one higher percentage language besides English, and other relevant factors, at this time it is an unnecessary burden to have any documents translated.

Due to the very small local LEP population, Asotin County PTBA does not have a formal outreach procedure in place, as of 2014. Translation resources have been identified. However, when and if the need arises for LEP outreach, Asotin County PTBA will consider the following options:

When staff prepares a document, or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.

IX. MONITORING

Monitoring and Updating the LEP Plan

Asotin County PTBA will update the LEP Plan as required. At a minimum, the plan will be reviewed and updated when data from the U.S. Census is available, or when it is clear that higher concentrations of LEP individuals are present in the Asotin County PTBA service area. Updates will include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the services area.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.

- Determine whether Asotin County PTBA's financial resources are sufficient to fund language assistance resources needed.
- Determine whether Asotin County PTBA fully complies with the goals of this LEP Plan.
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals.

X. DISSEMINATION OF THE ASOTIN COUNTY PTBA LEP PLAN

- Post signs at Asotin County PTBA notifying LEP persons of the LEP Plan and how to access language services.
- State on agendas and public notices in the language that LEP persons would understand that documents are available in that language upon request.

**ASOTIN COUNTY PTBA
NOTICE TO THE PUBLIC
TITLE VI**

Your Rights Under Title VI of the Civil Rights Act of 1964

"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."

What is Title VI?

Title VI of the Civil Rights Act of 1964 is the Federal law that protects individuals from discrimination on the basis of their race, color, or national origin in programs that receive Federal financial assistance.

What discrimination is prohibited by Title VI?

There are many forms of illegal discrimination based on race, color, or national origin that can limit the opportunity of individuals to gain equal access to services and programs. Among other things, in operating a federally assisted program, a recipient cannot, on the basis of race, color, or national origin, either directly or through contractual means:

- Deny program services, aids, or benefits;
- Provide a different service, aid, or benefit, or provide them in a manner different than they are provided to others; or
- Segregate or separately treat individuals in any manner related to the receipt of any service, aid, or benefit.

How can I file a discrimination complaint?

Because the Asotin County PTBA receives Federal financial assistance for public transportation, the County is responsible for preventing discrimination on the basis of race, color, or national origin, investigating complaints of discrimination, and correcting discriminatory acts, if they occur. If you believe that you or others protected by Title VI have been discriminated against, you may file a complaint with the Asotin County PTBA where you believe the discrimination is occurring.

A signed, written complaint should be filed with the Asotin County PTBA, generally within 180 days of the date of the alleged discrimination. It should describe:

- Your name, address, and telephone number. Your complaint must be signed. If you are filing on behalf of another person, include your name, address, telephone number, and your relation to that person (e.g., friend, attorney, parent, etc.)

- The name and address of the agency, institution, or department you believe discriminated against you.
- How, why, and when you believe you were discriminated against. Include as much background information as possible about the alleged acts of discrimination. Include names of individuals whom you allege discriminated against you, if you know them.
- The names of any persons, if known, that the investigating agency could contact for additional information to support or clarify your allegations.

What will the Asotin County PTBA do with my complaint?

The Asotin County PTBA will make a prompt investigation whenever a complaint or any other information indicates a possible failure to comply with Title VI of the Civil Rights Act. The investigation will include, where appropriate, a review of the pertinent practices and policies of the public transportation provider, the circumstances under which the possible noncompliance occurred, and other factors relevant to a determination as to whether the public transportation provider has failed to comply with Title VI.

After the investigation has been completed, the Asotin County PTBA will report its findings to the complainant in writing. This letter will 1) explain the steps the public transportation provider has taken or promises to take to come into compliance with Title VI, or 2) an explanation of why the public transportation provider was not found to be in non-compliance, and provide notification of the complainant's appeal rights.

The Asotin County PTBA will offer the complainant and the public transportation provider the opportunity to provide additional information that would lead the County to reconsider its conclusions. The complainant or public transportation provider must provide additional information within 60 days of the date the County's letter of finding was transmitted. After reviewing this information, the County will respond either by issuing a revised letter of resolution or finding to the appealing party, or by informing the appealing party that the original letter of resolution or finding remains in force within 60 days of receiving the appeal.

Contact:

Asotin County PTBA

Attn: Jenny George, Acting General Manager

1494 Poplar Street

Clarkston, WA 99403

- **Phone: (509) 758-3567 or TTY 1-800-377-3529, Speech to Speech 1-888-791-3004, Spanish to Spanish 1-866-252-0684**



**Asotin County PTBA
Title VI
Discrimination Complaint Form**

Asotin County PTBA 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. Title VI complaints must be filed within 180 days from the date of the alleged discrimination.

The following information is necessary to assist us in processing your complaint. If you require any assistance in completing this form, please contact the General Manager at 509-758-3567. The completed form must be returned to Asotin County PTBA, 1494 Poplar Street, Clarkston, WA 99403.

1. What is the name of the person discriminated against?

Name _____
Address _____
City, State, and Zip Code _____

2. What is the name and address of the institution, agency, or person that you believe discriminated against you?

Name _____
Address _____
City, State, and Zip Code _____

3. What was the reason you believe you were discriminated against? Was it because of your:

a. Race b. Color c. National Origin d. Other _____

4. When do you believe that the discrimination took place? _____

5. In your own words, explain what happened and who you believe was responsible. Please be as specific as possible. You may attach additional sheets if needed.

6. Have you tried to resolve this complaint with the institution, agency or person?
Yes No

If yes, what is the status of the complaint?

7. Are you filing this complaint for someone else? Yes No

If yes, against whom do you believe the discrimination was directed?

First Name _____ Las Name _____

8. Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court? Yes No

If yes, check all that apply: Federal Agency Federal Court State Agency
State Court Local Agency

9. What is the name of the contact person at the agency/court where the complaint was filed?

Name _____

Agency/Court Name _____

Address _____

City, State, and Zip Code _____

Telephone Number (____) _____

10. Please sign below. You may attach any written materials or other information that you think can be helpful to us in looking into your complaint.

Complainant's Signature

Date

Filing a complaint with our Title VI Office is voluntary. However, without the information requested above, our Title VI Office may be unable to proceed with your complaint. We collect this information under authority of Title VI of the Civil Rights Act of 1964 and other civil rights statutes. We will use the information you provide to determine if we have jurisdiction and if so, how we will process your complaint. Information submitted on this form is treated confidentially and is protected under the provisions of the Privacy Act of 1974. Names or other identifying information about individuals are disclosed when it is necessary for investigation of possible discrimination, for internal systems operations, or for routine uses, which include disclosure of information outside the Asotin County PTBA for purposes associated with civil rights compliance and as permitted by law. It is illegal for a recipient of Federal financial assistance to intimidate, threaten, coerce, or discriminate or retaliate against you for filing this complaint or for taking any other action to enforce your rights under Federal civil rights laws. You are not required to use this form. You may also email or write a letter and send it to the address above.



Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance (42 U.S.C. Section 2000d).

Asotin County PTBA is committed to practicing non-discrimination. If you believe you have been subject to discrimination you may file a complaint with the Asotin County PTBA General Manager.

For more info visit the Asotin County PTBA's website at www.ridethevalley.org or call 509-758-3567

Approved July 12, 2005

PUBLIC PARTICIPATION PLAN

The mission of the Lewis Clark Valley Metropolitan Planning Organization cannot be achieved without public interaction.

Through its Public Participation Plan (plan), the Lewis Clark Valley Metropolitan Planning Organization (LCVMPO) intends to provide opportunity for appropriate broad-based, early, continuous, and meaningful public participation in all planning, programs, and projects. Further, LCVMPO intends to encourage an on-going forum for the discussion of regional issues, striving for an open exchange of information and ideas. The Plan calls for a broad range of public information and participation opportunities, supplying complete information, timely public notice and full access to key decisions.

The Plan provides a broad overview of basic public participation policy. Certain major planning efforts, programs, or projects may include public participation plans specific to that effort. The term "major" is to be applied loosely. If a proposed action or decision is clearly a normal-course of business activity that does not significantly affect the public or alter public policy, it may not be necessary to apply these public procedures. If there is a question as to whether the Plan should be followed, LCVMPO shall follow it to ensure appropriate public notification and participation.

The Plan will be reassessed as necessary to determine if the public's needs for information and access are being met or to comply with changing regulatory requirements.

Failure to exactly comply with all Plan elements shall not constitute a failure of public process, nor render any actions or decisions invalid.

Public Access

LCVMPO will provide the public with timely notice and reasonable access to meetings and information.

- All regular meetings of the Lewis Clark Valley Metropolitan Planning Organization, Transportation Policy Board and any subcommittee shall be open to the public, except as allowed under the state Open Public Meetings Act. Special meetings such as public hearings, forums, workshops and open houses shall also be open to the public.
- The Lewis Clark Valley Metropolitan Planning Organization shall hold all regular and special meetings at venues that are accessible to persons with disabilities. Every effort

will be made to select venues that are accessible to people who rely on public transportation.

- LCVMPPO shall make every effort to hold special meetings, workshops and other outreach efforts in local communities and at different times of day to allow more opportunity for attendance by all members of the community.
- The Lewis Clark Valley Metropolitan Planning Organization shall make every effort to accommodate persons with special needs. Individuals needing special accommodation to participate in meetings should contact LCVMPPO three days prior to the scheduled meeting.
- Public notification of all regular meetings of the Lewis Clark Valley Metropolitan Planning Organization, Transportation Policy Board and subcommittees shall be made at least 5 days in advance of the meeting. In the case of special meetings, every attempt will be made to provide at least 5 days advance notice. Meeting notices will also be posted on LCVMPPO's website.
- Notification of all regular and special meetings will be provided to LCVMPPO membership, meeting participants, local news media, and anyone requesting notification. Notification will be made via electronic mail or other appropriate means and posted on the LCVMPPO web site and shall include the time, date and location of the meeting. In certain circumstances, notice may also take the form of a press release, paid legal notice or advertisement, or may use non- traditional methods to reach certain segments of the community.
- All LCVMPPO plans and documents shall be made available for public review. In certain circumstances, copies of documents and plans will also be distributed to public libraries and other public venues for review. When feasible, plans and documents will be posted on the LCVMPPO website.
- Most publications will be made available free of charge. When appropriate, a charge may be assessed to cover the cost of production and mailing.
- LCVMPPO will provide reasonable access to technical and policy information used in the development of plans and programs.
- Upon request, and within a reasonable timeframe, LCVMPPO will make every effort to make plans and documents available in alternative formats.

Public Outreach

LCVMPO shall create opportunities for all segments of the community to learn about and engage in issues under consideration by the Board, particularly those that may be directly impacted by the outcomes of specific recommendations and decisions.

- LCVMPPO shall inform and educate the public about regional issues using a variety of means, including, but not limited to: regular and special meetings, workshops, printed materials, exhibits, open houses, and electronic communication. Efforts will be made to "take the information to the people" by traveling to different parts of the valley with issues of special interest and including the information as part of other general or special interest gatherings.
- The Lewis Clark Valley Metropolitan Planning Organization shall identify ways to reach out to certain underrepresented members of the community who may because of income, location, language or other barriers have been unable to fully participate in the process. Outreach efforts may enlist the assistance of civil, social service; faith-based, or political entities to better understand the community and may result in production of special materials.
- LCVMPPO shall develop and maintain a list of civic, advocacy, service and other organizations and interested or potentially interested persons to disseminate information about regional planning activities.
- Special efforts shall be made to include members of potentially underserved groups, including minority and low-income populations.
- LCVMPPO will seek new methods and technologies to enlist in informing and engaging the public regarding all agency plans, projects and programs.
- The Public Participation Plan shall be reviewed periodically to determine its effectiveness assuring full and open access to all.

Public Input

LCVMPO values a two-way conversation with the public it serves. Explicit consideration of public input and response to public input is an integral element of LCVMPPO's decision-making processes.

- A public comment period shall be provided during each regular meeting of the Lewis Clark Valley Metropolitan Planning Organization and Transportation Policy Board. The Chair may limit the duration of comments or provide alternative options for public comment in certain circumstances.
- On a regular basis, LCVMPPO may convene gatherings of community members in a variety of formats and venues to provide the opportunity for the public to express

comments, suggestions, concerns and ideas on regional issues.

- As needed, LCVMPPO will utilize surveys to assess either widespread or selected public opinion.
- The Lewis Clark Valley Metropolitan Planning Organization shall offer different avenues for public comment -written, oral, formal, informal, electronic and other means suitable to the project and the community involved.
- Certain plans and programs require an extended review period, to allow for the submittal of written comment. For projects with such extended review, LCVMPPO shall provide ample notice and opportunity for review and written comment.
- Written and oral comments will be maintained in LCVMPPO's files. In certain circumstances, the comments may be incorporated into plans, programs or studies, either in total or in summary.

In addition to the procedures outlined in the Plan, LCVMPPO will comply with all applicable state and federal laws, including but not limited to:

- Open Public Meetings Act for Idaho and Washington
- State Environmental Policy Act {RCW 43.21C}
- Americans With Disabilities Act of 1990 {P.L.101-336}
- Federal Transportation Equity Act for the 21st Century (TEA-21) {P.L. 105-178}
- The Civil Rights Act of 1964 {42 U.S.C. 2000d}
- Federal Aid Highway Act of 1973 {23 U.S.C. 324}
- Rehabilitation Act of 1973, Section 504 {29 U.S.C. 790}
- Age Discrimination Act of 1975 {42 U.S.C. 6101}
- Civil Rights Restoration Act of 1987 {P.L. 100-209}
- Executive Order 12898- 59 Fed. Reg. 7629 (1994) -(Environmental Justice)

For more information on the public participation policies of the Lewis Clark Valley Metropolitan Planning Organization please contact:

Shannon Grow, LCVMPPO Director
P.O. Box 759
Asotin WA, 99402
Phone: 208.298.1345
Fax: 208.298.1339
e-mail: director@lewisclarkmpo.org
website: www.lewisclarkmpo.org