

**2021 Title VI Plan for
SPOKANE REGIONAL TRANSPORTATION COUNCIL**



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Spokane Regional Transportation Council Title VI Plan

Policy Statement:

Spokane Regional Transportation Council is committed to non-discrimination in accordance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, Executive Order 12898 on Environmental Justice, and related statutes and regulations in all programs and activities.

No person shall on the grounds of race, color, national origin, gender, gender identity or expression, sexual orientation, age, religion, veteran status, familial or marital status, medical condition, or disability, be excluded from participation in, be denied the benefits of, or otherwise be subjected to any program or activity a. SRTC further assures every effort will be made to ensure non-discrimination in all of its programs and activities, whether those programs and activities are federally funded or not.

The Civil Rights Restoration Act of 1987, broadened the scope of Title VI coverage by expanding the definition in terms "programs or activities" to include all programs or activities of Federal Aid recipients, sub-recipients, and contractors/consultants, whether such programs and activities are federally assisted or not (Public Law 100259 [S.557] March 22, 1988).

In the event SRTC distributes federal aid funds to a sub-recipient, SRTC will include Title VI language in all written agreements and will monitor for compliance. SRTC's Title VI Coordinator is responsible for initiating and monitoring Title VI activities, preparing reports and other responsibilities as required by 23 Code of Federal Regulations (CFR) 200 and 49 Code of Federal Regulation 21.

Title VI Coordinator: Michael Redlinger | Phone: 509-343-6370 | email: mredlinger@srtc.org



Lois Bollenback, SRTC Executive Director

11/2/21

Date

Authorities:

Title VI of the 1964 Civil Rights Act provides that no person in the United States shall, on the grounds of race, color, national origin, age, creed, or sex, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance (refer to 23 CFR 200.9 and 49 CFR 21). The Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of the terms “programs or activities” to include all programs or activities of federal aid recipients, sub-recipients, and contractors, whether such programs and activities are federally assisted or not (Public Law 100259 [S. 557] March 22, 1988).

Additional Authorities and Citations Include: Title VI of the Civil Rights Act of 1964, 42 USC 2000d to 2000-4; 42 USC 4601 to 4655; 23 United States Code 109(h); 23 United States Code 324; Department of Transportation Order 1050.2; Executive Order 12250; Executive Order 12898; 28 CFR 50.

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INTRODUCTION

The Spokane Regional Transportation Council (SRTC) is designated the Regional Transportation Planning Organization (RTPO) at the state level and a Metropolitan Planning Organization (MPO) for Spokane County at the Federal level. MPOs ensure transportation expenditures are based on a continuing, cooperative, and comprehensive planning process. RTPOs cover both urban *and* rural areas and receive state funding for planning activities.

Funds for transportation projects and programs are channeled through SRTC and awarded to local agencies and jurisdictions that deal with transportation. Additionally, as a regional intergovernmental agency, SRTC encourages communication, coordination and collaboration between planning and transportation departments at member agencies to assure connectivity throughout Spokane County. An Interlocal Agreement between SRTC and the following agencies demonstrates SRTC's commitment to working together to provide each other, and the public, with quality transportation planning services:

City of Airway Heights	Spokane Transit Authority
City of Cheney	Town of Fairfield
City of Deer Park	Town of Latah
City of Liberty Lake	Town of Rockford
City of Medical Lake	Town of Spangle
City of Millwood	Town of Waverly
City of Spokane	WSDOT-Eastern Region
City of Spokane Valley	Washington State Transportation Commission
Spokane County	

Participating Tribes include the Spokane Tribe of Indians and Kalispel Tribe of Indians.

Operational Guidelines

Primary guidance to SRTC is provided by:

- The Metropolitan Planning Organization (MPO) Regulations 23 CFR 450.
- RCW 47.80 Regional Transportation Planning Organization (RTPO).
- 2021 SRTC Interlocal Agreement
- Fixing America's Surface Transportation (FAST) Act (Pub. L. No. 114-94)
- State and Federal Clean Air Acts and Amendments
- Washington State Growth Management Act
- SRTC Public Participation Plan
- SRTC Procurement Process Policy
- Title 48, Chapter 1, Part 31 – Contract Cost Principles and Procedures
- Title 23, CFR 172 – Administration of Engineering and Design Related Service Contracts
- RCW 39.29 – Personal Service Contracts
- RCW 39.80 – Contracts for Architectural and Engineering Services
- Disadvantage Business Enterprises (DBE) Program
- SRTC Employee Handbook
- 2021 SRTC Title VI Plan

AGENCY ORGANIZATION

Board of Directors

SRTC is governed by a Board of Directors consisting of elected officials and member agency executives. There are 18 voting members and two non-voting members. The Board is the decision and policy making body of SRTC; the group meets monthly.

Transportation Technical Committee

The Transportation Technical Committee (TTC) is made up of 21 transportation planners, traffic engineers, professionals from SRTC member agencies. The TTC meets monthly to review SRTC activities, coordinate projects, provide input on projects, and conduct technical reviews of work programs and transportation studies and provide recommendations to the Board.

Transportation Advisory Committee

The Transportation Advisory Committee (TAC) is a citizen's group that provides transparency and a community perspective on regional transportation planning. It provides recommendations to the Board on plans, programs and activities transportation policies, and other activities as directed by the Board

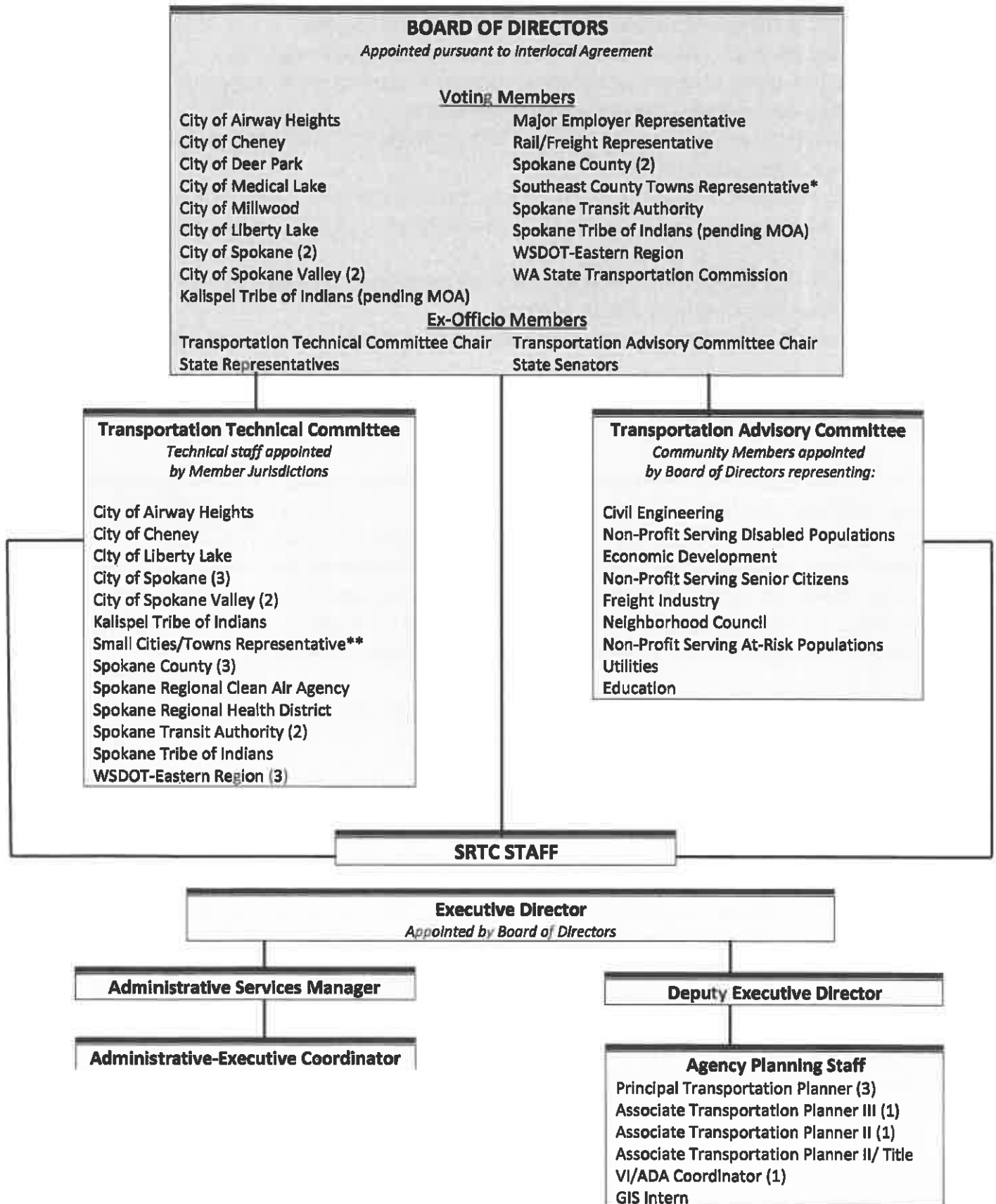
Agency Staff

SRTC's Executive Director is responsible for confirming the application of the Title VI program. The Title VI Coordinator is responsible for implementing, monitoring and ensuring SRTC's compliance with Title VI regulations. The Title VI Coordinator's responsibilities include:

- Preparing and submitting the annual Title VI Report to WSDOT.
- Reviewing SRTC's Title VI program to assure compliance with Title VI regulations, that adequate resources are available to ensure compliance, and that the program is effective.
- Updating Title VI-related goals and objectives.
- Collecting statistical data (race, color, gender, national origin, etc.) of participants in SRTC's programs and beneficiaries of them.
- Conducting Title VI reviews of program areas including planning, education and outreach, contracting and environmental affairs.
- Where applicable, including Title VI and related requirements in SRTC policies.
- Processing Title VI complaints using the agency's Nondiscrimination Complaint Procedures included in this document to resolve complaints.
- Assessing communications and public involvement strategies to ensure participation of impacted Title VI-protected groups was encouraged.

Spokane Regional Transportation Council Organizational Chart

10.05.2021



GENERAL PROGRAM ADMINISTRATION

Principles of SRTC's Communications & Public Participation Program

- Equitable access is an essential part of the public involvement process.
- All major public policy decisions and/or public projects implemented will impact the community.
- Professionals do not have a monopoly on good solutions.
- Even if a project or policy decision is sensible and beneficial, it must be arrived at properly to be acceptable to community members.
- Community members or groups are more willing to accept a decision that affects different interests unequally providing that the decision-making process is open, objective, and considers all viewpoints.
- If project or policy staff does not provide all relevant information necessary for an informed decision, the public will rely on outside sources.
- Effective public notification and participation takes time and effort but is vital to sound decision-making.

PUBLIC PARTICIPATION PLAN

SRTC's Public Participation Plan (PPP) guides the agency's communications and public participation program and outlines tools/resources used to engage the public. In accordance with 23 CFR 450.316(a), it is SRTC's "process for providing citizens, affected public agencies, representatives of public transportation users, freight shippers, providers of freight transportation services, private providers of transportation, representatives of users of public transportation, representatives of users of pedestrian walkways and bicycle transportation facilities, representatives of the disabled, and other interested parties with reasonable opportunities to be involved in the metropolitan planning process."

SRTC's PPP can be found at srtc.org/get-involved/public-involvement.

Elements of SRTC's PPP include:

- **Website** – SRTC.org includes information on the agency's programs and publications; meeting times and dates; contact information; the Title VI Plan, complaint procedures and complaint form; and an agency blog.
- **Publications** – SRTC issues publications, reports, and maps and responds to and processes data requests. The information is used by jurisdictions throughout the region and can be accessed through the website or by contacting SRTC directly.
- **Press releases** – Press releases are routinely sent to regional media outlets, as well as community stakeholders and Title VI protected groups. All press releases include a Title VI Notice to the public and contact information to reach agency staff.
- **Public meetings** – SRTC hosts public meetings and open houses as needed to promote agency activities. All Board and advisory committee meetings are open to the public, with an item on every meeting agenda for public comments.

- **Opportunities for public comment** – SRTC provides opportunity for public comment and works to find new ways to solicit comment and involve all segments of the population. Comments are accepted via phone, email, mail, social media, and in person at SRTC committee meetings or public events. Formal public comment periods are designated prior to adoption or approval of major documents including the Transportation Improvement Program (TIP) and the Metropolitan Transportation Plan (MTP). SRTC responds to all comments with how it will be reviewed and considered by staff and member agencies.
- **Access to Staff** – SRTC staff is accessible in person, by telephone, mail, or email. Contact information is on the agency website.
- **Email** – SRTC uses email to inform the public of programs, public comment periods, meetings, and more. These lists include groups representing Title VI populations.
- **Social Media** – SRTC is active on a variety of social media platforms in order to reach the widest audience possible when sharing meeting notices, public comment period, workshops and other regional transportation related topics and news.
- **Public meetings, hearings and events** – Trainings, workshops, open houses, and forums are held as needed. SRTC holds public hearings or meetings during major updates to the region's Metropolitan Transportation Plan, the Transportation Improvement Program and other plans, studies or documents.

Strategies for Engaging Title VI Protected Groups and Individuals with Limited English Proficiency (LEP)

SRTC considers the needs of people traditionally under-served by transportation systems (such as low income and minority populations). An Environmental Justice (EJ) demographic profile (included Appendix 2 to this document) was created using US Census Bureau and American Community Survey data to identify the number and locations of area minority, low income, elderly and limited English proficient populations.

Census data shows the Spokane area has a small population of Limited English Proficient residents. Still, the county is rich with diversity. American Community Survey (2011-2015) data has indicated that, in total, over 30 different languages are spoken at home by Spokane County's LEP residents. Spanish, Russian and other Slavic languages are spoken most often in area homes after English. SRTC concentrates LEP efforts primarily on these populations through:

- Translated flyers placed in areas frequented or inhabited by concentrations of Limited English Proficient populations;
- Electronic e-mailing lists targeted to these populations. They include contact information for EJ population members, Title VI community groups and businesses owned by minorities or targeted to meeting the needs of minority groups.
- Translated materials for meetings in areas where concentrations of Limited English Proficient populations reside;
- Contact with Spanish and Russian language media outlets.

SRTC's Title VI Coordinator has "I Speak" cards in case a person with limited English proficiency approaches staff. The Coordinator will identify the language needed and seek translation help.

Strategies for Engaging Tribal Governments and Members

Membership to SRTC is open to all federally designated Tribal Nations in the planning area. There are two federally recognized Native American tribal governments with trust lands in SRTC's planning area; the Spokane Tribe and Kalispel Tribe. Both have seats on the Transportation Technical Committee (TTC) and (as of the date of this document) discussions are currently underway for appointing members to the Tribal seats on the Board of Directors. Tribes include their projects in the regional Transportation Improvement Program (TIP) if:

- It is completely physically contained in SRTC's planning area;
- The project crosses into SRTC's planning area; or
- Is a transit capital project.

Tribal contacts receive SRTC meeting notices and Tribal publications receive SRTC news releases. SRTC also notifies tribes of opportunities to participate through direct outreach to tribal leaders and staff, a Tribal Contacts email distribution list, agenda packets and inclusion on stakeholder groups for subarea studies with tribal trust land in the vicinity. The Tribal Liaison in the Washington State Department of Transportation's (WSDOT's) Planning Office is also utilized as a point of contact.

Key Planning and Programming Activities

SRTC is mandated by state and federal law to maintain the region's long-range Metropolitan Transportation Plan (MTP), and the Transportation Improvement Program (TIP), a program of projects to be completed in the coming four years. SRTC conducts and supports state and federal planning, compliance, and certification programs, which enable counties, cities, transit agencies and WSDOT to obtain state and federal funding. The agency provides forecasts of population, housing, and transportation trends that are the basis for addressing current issues and exploring future needs and options that could benefit the region. SRTC also serves as a center for the collection, analysis, and dissemination of Census information to residents and governments in the region.

SRTC's Interlocal Agreement establishes the agency's growth management, transportation, database and technical assistance responsibilities. The agreement highlights the following functions:

- Fulfill MPO responsibilities for Spokane County, develop a regional transportation plan, review and approve expenditures of federal transportation funds and identify transportation system development needs and financial strategies.
- Fulfill RTPO requirements prescribed by state law for Spokane County; ensure that regional transportation and land-use plans are integrated; and ensure that state, regional and local transportation plans are consistent.
- Forecast and monitor economic, demographic, and travel conditions in the region as the foundation for local and regional planning.

- Provide technical assistance to local, state and federal governments and business and community organizations.
- Provide a forum for the discussion of emerging regional transportation issues.

Major Programs

- **Metropolitan Transportation Plan (MTP)** – Provides a long-range regional investment strategy for transit, roadway, freight, and non-motorized transportation. Addresses the financial needs and estimated revenue for transportation improvements.
- **Transportation Improvement Program (TIP)** – Includes all projects using federal funds, funds managed by SRTC and the state and all regionally significant projects.
- **Air Quality Analysis and Planning** – SRTC provides air quality modeling services to local jurisdictions using Environmental Protection Agency (EPA) approved models and procedures.
- **Policy, Plan and Project Review** – Ensure that local, regional, and state planning efforts are compatible and work with local governments, growth management groups, and state agencies in reviewing policies, plans and projects for consistency with state and regional planning goals.
- **Technical Services and Regional System Data** – Provide demographic, economic, travel and geographic data to member jurisdictions, other agencies, businesses and the public; assist in planning activities of member jurisdictions; collect, analyze, maintain, and improve data.
- **Communications and Information Services** - Develop and distribute outreach materials on agency activities and services. Assist agency staff in reaching out to, involving, and meeting the needs of SRTC members, other agencies, businesses, community organizations and the public.

CONTRACT PROCEDURES

SRTC contracts include language requiring contractors (subrecipients of federal funds) to comply with the provisions of 49 U.S.C. 5332, which prohibits discrimination on the basis of race, color, creed, national origin, sex, or age, and prohibits discrimination in employment or business opportunity. Title VI verbiage is included in all SRTC Requests for Proposals (RFP) and contracts.

When contracting for outside services, SRTC utilizes WSDOT guidelines and lists for determining Disadvantaged Business Enterprises (DBE) goals for each contract. SRTC reports on DBE participation in the annual Title VI report.

SRTC's Fiscal Officer is responsible for evaluating and monitoring compliance with Title VI requirements in some aspects of the agency's consultant contracts process. The Fiscal Officer will include Title VI language in contracts and Requests for Proposals (RFP) as described below:

- *Ensure Title VI text is included in all agency contracts.*
- *Notify contractors of the appropriate text to be included in any subcontracts.*

Review consultants for Title VI compliance as described below:

- *If a subrecipient is found to be not in compliance with Title VI, the Title VI Coordinator and Fiscal Officer will work with the subrecipient to resolve the deficiency status and write a remedial action if necessary, as described in the next section.*

In conducting reviews of subrecipients, if a subrecipient is found to not be compliant with Title VI, the Fiscal Officer and Title VI Coordinator will work with the subrecipient to resolve the identified issues.

If the issues cannot be resolved, SRTC will issue a notification of deficiency status and remedial action for the subrecipient, as agreed upon by SRTC and WSDOT, within a period not to exceed ninety (90) calendar days. SRTC will seek the cooperation of the subrecipient in correcting deficiencies and provide technical assistance and guidance for the subrecipient to comply voluntarily. Subrecipients placed in a deficiency status will be given a reasonable time, not to exceed ninety (90) calendar days after receipt of the deficiency letter and remedial action, to voluntarily correct deficiencies. If a subrecipient fails or refuses to comply with requirements within that time frame, SRTC will submit to WSDOT, FHWA, and FTA two copies of the case file and a recommendation that the subrecipient be found in noncompliance.

A follow-up review will be conducted within one hundred eighty (180) calendar days of the initial review to ensure the subrecipient has complied with the Title VI Program requirements in correcting deficiencies. If the subrecipient refuses to comply, SRTC may, with WSDOT's, FHWA's, and FTA's concurrence, initiate sanctions per 49 CFR 21.

TITLE VI NOTICE TO THE PUBLIC

The paragraph below is inserted in all significant publications that are distributed to the public, such as the Metropolitan Transportation Plan and Transportation Improvement Program. The version below is the preferred text but where space is limited, the abbreviated version will be used.

Spokane Regional Transportation Council is committed to non-discrimination in accordance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, Executive Order 12898 on Environmental Justice, and related statutes and regulations in all programs and activities. No person shall on the grounds of race, color, national origin, gender, gender identity or expression, sexual orientation, age, religion, veteran status, familial or marital status, medical condition, or disability, be excluded from participation in, be denied the benefits of, or otherwise be subjected to any program or activity a. SRTC further assures every effort will be made to ensure non-discrimination in all of its programs and activities, whether those programs and activities are federally funded or not.

Any person who believes they have been affected by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with SRTC. Any such complaint must be in writing and filed with SRTC's Title VI Coordinator within one hundred eight (180) days following the date of the alleged discriminatory occurrence. For more information, or to obtain a Title VI Discrimination Complaint Form, please go to our website at http://www.srtc.org/title_vi_page.html or call (509)343-6370.

Abbreviated Title VI Notice to the Public

SRTC is committed to nondiscrimination in accordance with the Title VI of the Civil Rights Act of 1964, and Civil Rights Restoration Act of 1987 (P.O. 100.259) and the American with Disabilities Act. For more information, or to obtain a Title VI Complaint Form, see <http://www.srtc.org> or call (509) 343-6370.

NONDISCRIMINATION COMPLAINT PROCEDURES

These procedures apply to all complaints filed under Title VI of the Civil Rights Act of 1964 [including its Disadvantaged Business Enterprises (DBE) and Equal Employment Opportunity (EEO) components], Section 504 of the Rehabilitation Act of 1973, the Civil Rights Restoration Act of 1987, and the Americans with Disabilities Act of 1990, relating to any program or activity administered by SRTC or its subrecipients, consultants, and/or contractors. Intimidation or retaliation of any kind is prohibited by law.

These procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies, or to seek private counsel for complaints alleging discrimination. These procedures are part of an administrative process that does not provide for remedies that include punitive damages or compensatory remuneration for the complainant.

Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation between the affected parties and the Title VI Coordinator may be utilized for resolution, at any stage of the process. The Title VI Coordinator will make every effort to pursue a resolution to the complaint. Initial interviews with the complainant and the respondent will request information regarding specifically requested relief and settlement opportunities.

Procedures

1. Any individual, group of individuals, or entity that believes they have been subjected to discrimination prohibited by Title VI nondiscrimination provisions may file a written complaint with SRTC's Title VI Coordinator or fill out the Title VI Discrimination Complaint form that follows. A formal complaint must be filed within 180 calendar days of the alleged occurrence or when the alleged discrimination became known to the complainant. If an individual would prefer not to file a complaint to SRTC, the WSDOT Office of Equal Opportunity (OEO) may be contacted directly. Title VI complaints must meet the following requirements:

- a. If possible, complaints should be submitted in writing, signed by the complainant or his/her representative(s). These may be provided via facsimile, mail or e-mail and receipt of the allegation will be acknowledged within five (5) business days. Allegations may also be provided verbally or by telephone, which will be documented by SRTC staff in writing and communicated to the complainant(s) for review before processing. If the complainant is hearing or speech-impaired, they can seek assistance through the TTY-Based Telecommunications Relay Service by dialing 7-1-1. More information about Telecommunications Relay Service can be found at: <https://www.fcc.gov/consumers/guides/711-telecommunications-relay-service>
- b. Include the date of the alleged act of discrimination (date when the complainant(s) became aware of the alleged discrimination; or the date on which that conduct was discontinued or the latest instance of the conduct).
- c. Present a detailed description of the issues, including names and job titles of those individuals perceived as parties in the complained-of incident.

- d. Allegations received by fax or e-mail will be acknowledged and processed, once the identity(ies) of the complainant(s) and the intent to proceed with the complaint have been established. For this, the complainant is required to mail a signed, original copy of the fax or e-mail transmittal.
- e. Allegations received by telephone will be converted into writing and provided to the complainant for confirmation or revision before processing. A complaint form will be forwarded to the complainant for them to complete, sign, and return to SRTC for processing.

2. Upon receipt of the complaint, the Title VI Coordinator will determine its jurisdiction, acceptability, and need for additional information, as well as investigate the merit of the complaint. In cases where the complaint is against one of SRTC's subrecipients of federal funds, SRTC will assume jurisdiction and will investigate and adjudicate the case. Complaints against SRTC will be referred to the Washington State Department of Transportation's (WSDOT) Office of Equal Opportunity (OEO), the Federal Highway Administration, or the Federal Transit Administration, as appropriate, for proper disposition pursuant to their procedures. In cases warranting intervention to ensure equity, these agencies may assume jurisdiction and complete or obtain services to review or investigate matters.

3. In order to be accepted, a complaint must meet the following criteria:

- a. Be filed within 180 calendar days of the alleged occurrence or when the alleged discrimination became known to the complainant.
- b. The allegation(s) must involve a covered basis such as race, color, national origin, sex, disability, or retaliation.
- c. The allegation(s) must involve a program or activity of a federal aid recipient, subrecipient, or contractor, or, in the case of Americans with Disabilities Act (ADA) allegations, an entity open to the public.
- d. The complainant(s) must accept reasonable resolution based on SRTC's administrative authority (reasonability to be determined by SRTC).

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 repeated requests for additional information needed to process the complaint.
- c. The complainant cannot be located after reasonable attempts.

5. Once SRTC or WSDOT decides to accept the complaint for investigation, the complainant and the respondent will be notified in writing of such determination within five (5) calendar days. The complaint will receive a case number and will then be logged in SRTC's or WSDOT's records identifying its basis and alleged harm, and the race, color, national origin, and gender of the complainant.

6. In cases where SRTC assumes the investigation of the complaint, SRTC will provide the respondent the opportunity to respond to allegations in writing. The respondent will have ten (10) calendar days from the date of SRTC's written notification of acceptance of the complaint to furnish a response.

7. In cases where SRTC assumes the investigation of the complaint, within forty (40) calendar days of the acceptance of the complaint, SRTC's Investigator* will prepare a report for review by the agency's Legal Counsel and Executive Director. The report will include a description of the incident, identification of persons interviewed, findings, and recommendations for disposition.
8. The report and its findings will be sent to SRTC's Legal Counsel for review. Counsel will review the report and associated documentation and provide input to the Investigator within ten (10) calendar days.
9. Any comments or recommendations from Legal Counsel will be reviewed by SRTC's Investigator. The Investigator will discuss the report and recommendations with the Executive Director within ten (10) calendar days. The report will be modified as needed and made final for its release.
10. SRTC's final investigative report and a copy of the complaint will be forwarded to WSDOT's OEO within 60 calendar days of the acceptance of the complaint. WSDOT's OEO will share the report with FHWA and FTA, Washington Division Offices, as part of its Annual Title VI Update and Accomplishment Report.
11. SRTC will notify the parties of its preliminary findings, which are subject to concurrence from WSDOT's OEO. WSDOT's OEO will issue the final decision to SRTC based on the report.
12. Once WSDOT's OEO issues its final decision, SRTC will notify all parties involved about such determination. WSDOT's final determination is not subject to an appeal.
13. WSDOT will also serve as the appealing forum to a complainant that is not satisfied with the outcome of an investigation conducted by SRTC. WSDOT will analyze the facts of the case and will issue its conclusion to the appellant according to their procedures.

*This will generally be SRTC's Title VI Coordinator.

Title VI Complaint Form

Title VI of the 1964 Civil Rights Act requires that "No person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance."

Please provide the following requested information in order to assist us in processing your complaint. Should you require any assistance in completing this form, please contact SRTC's Title VI Coordinator, Michael Redlinger at (509) 625-6703 or mredlinger@src.org. Please submit this form to SRTC, 421 W. Riverside Ave., Suite 500, Spokane, WA 99201 or email it to the address above.

1. Complainant's Name _____

2. Address _____

3. City, State, Zip Code _____

4. Telephone Number: Mobile _____ Home _____ Work _____

5. Person discriminated against (if someone other than the complainant)

Name _____

Address _____

City, State, Zip Code _____

6. Which of the following best describes the reason you believe the discrimination occurred?

a. Race/Color ☐

b. National Origin ☐

c. Gender ☐

d. Age ☐

e. Disability ☐

7. What date did the alleged discrimination take place? _____

Title VI Complaint Form (cont.)

8. Please describe the alleged discrimination. Explain what happened and whom you feel was responsible. Please attach a piece of paper if additional space is required.

9. Please provide names and contact information for anyone who may have witnessed the alleged discrimination or can support and/or clarify the allegations.

10. Please specify what type of corrective action you would like to see implemented in this case if allegations of wrongdoing are proven.

11. Please sign below and attach any written materials or other information you feel is relevant to your complaint

Complainant's Signature

Date

**The United States Department of Transportation (USDOT) Standard Title VI/Non-Discrimination
Assurances**

DOT Order No. 1050.2A

The Spokane Regional Transportation Council (herein referred to as the "Recipient"), HEREBY AGREES THAT, as a condition to receiving any Federal financial assistance from the U.S. Department of Transportation (DOT), through Washington State Department of Transportation (WSDOT), is subject to and will comply with the following:

Statutory/Regulatory Authorities

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin);
- 49 C.F.R. Part 21 (entitled Non-discrimination In Federally-Assisted Programs Of The Department Of Transportation-Effectuation Of Title VI Of The Civil Rights Act Of 1964);
- 28 C.F.R. section 50.3 (U.S. Department of Justice Guidelines for Enforcement of Title VI of the Civil Rights Act of 1964);

The preceding statutory and regulatory cites hereinafter are referred to as the "Acts" and "Regulations," respectively.

General Assurances

In accordance with the Acts, the Regulations, and other pertinent directives, circulars, policy, memoranda, and/or guidance, the Recipient hereby gives assurance that it will promptly take any measures necessary to ensure that:

"No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity, for which the Recipient receives Federal financial assistance from DOT, including the Washington State Department of Transportation.

The Civil Rights Restoration Act of 1987 clarified the original intent of Congress, with respect to Title VI and other Non-discrimination requirements (The Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973), by restoring the broad, institutional-wide scope and coverage of these non-discrimination statutes and requirements to include all programs and activities of the Recipient, so long as any portion of the program is Federally assisted.

Specific Assurances

More specifically, and without limiting the above general Assurance, the Recipient agrees with and gives the following Assurances with respect to its Federally assisted program:

1. The Recipient agrees that each "activity," "facility," or "program," as defined in §§ 21.23(b) and 21.23(e) of 49 C.F.R. § 21 will be (with regard to an "activity") facilitated, or will be (with regard

to a "facility") operated, or will be (with regard to a "program") conducted in compliance with all requirements imposed by, or pursuant to the Acts and the Regulations.

2. The Recipient will insert the following notification in all solicitations for bids, Requests For Proposals for work, or material subject to the Acts and the Regulations made in connection with all Federal-Aid Highway Programs and, in adapted form, in all proposals for negotiated agreements regardless of funding source:

"The Spokane Regional Transportation Council, in accordance with the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252, 42 U.S.C. §§ 2000d to 2000d-4) and the Regulations, hereby notifies all bidders that it will affirmatively ensure that any contract entered into pursuant to this advertisement, disadvantaged business enterprises will be afforded full and fair opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award."

3. The Recipient will insert the clauses of Appendix A and E of this Assurance in every contract or agreement subject to the Acts and the Regulations.
4. The Recipient will insert the clauses of Appendix B of this Assurance, as a covenant running with the land, in any deed from the United States effecting or recording a transfer of real property, structures, use, or improvements thereon or interest therein to a Recipient.
5. That where the Recipient receives Federal financial assistance to construct a facility, or part of a facility, the Assurance will extend to the entire facility and facilities operated in connection therewith.
6. That where the Recipient receives Federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the Assurance will extend to rights to space on, over, or under such property.
7. That the Recipient will include the clauses set forth in Appendix C and Appendix D of this Assurance, as a covenant running with the land, in any future deeds, leases, licenses, permits, or similar instruments entered into by the Recipient with other parties:
 - a. for the subsequent transfer of real property acquired or improved under the applicable activity, project, or program; and
 - b. for the construction or use of, or access to, space on, over, or under real property acquired or improved under the applicable activity, project, or program.
8. That this Assurance obligates the Recipient for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of, personal property, or real property, or interest therein, or structures or improvements thereon, in which case the Assurance obligates the Recipient, or any transferee for the longer of the following periods:

- a. the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or
 - b. the period during which the Recipient retains ownership or possession of the property.
9. The Recipient will provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom he/she delegates specific authority to give reasonable guarantee that it, other recipients, sub-recipients, sub-grantees, contractors, subcontractors, consultants, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Acts, the Regulations, and this Assurance.
10. The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Acts, the Regulations, and this Assurance.

By signing this ASSURANCE, Spokane Regional Transportation Council also agrees to comply (and require any sub-recipients, sub-grantees, contractors, successors, transferees, and/or assignees to comply) with all applicable provisions governing the WSDOT access to records, accounts, documents, information, facilities, and staff. You also recognize that you must comply with any program or compliance reviews, and/or complaint investigations conducted by the WSDOT. You must keep records, reports, and submit the material for review upon request to WSDOT, or its designee in a timely, complete, and accurate way. Additionally, you must comply with all other reporting, data collection, and evaluation requirements, as prescribed by law or detailed in program guidance.

Spokane Regional Transportation Council gives this ASSURANCE in consideration of and for obtaining any Federal grants, loans, contracts, agreements, property, and/or discounts, or other Federal-aid and Federal financial assistance extended after the date hereof to the recipients by the U.S. Department of Transportation under the Federal Highway Administration. This ASSURANCE is binding on Washington State Department of Transportation, other recipients, sub-recipients, sub-grantees, contractors, subcontractors and their subcontractors', transferees, successors in interest, and any other participants in the Federal-Aid Highway Program. The person(s) signing below is authorized to sign this ASSURANCE on behalf of the Recipient.

Spokane Regional Transportation Council
(Name of Recipient)

by


(Signature of Authorized Official)

DATED

9/14/21

APPENDIX A

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the "contractor") agrees as follows:

1. **Compliance with Regulations:** The contractor (hereinafter includes consultants) will comply with the Acts and the Regulations relative to Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation, Washington State Department of Transportation, as they may be amended from time to time, which are herein incorporated by reference and made a part of this contract.
2. **Non-discrimination:** The contractor, with regard to the work performed by it during the contract, will not discriminate on the grounds of race, color, or national origin in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The contractor will not participate directly or indirectly in the discrimination prohibited by the Acts and the Regulations, including employment practices when the contract covers any activity, project, or program set forth in Appendix B of 49 CFR Part 21.
3. **Solicitations for Subcontracts, Including Procurements of Materials and Equipment:** In all solicitations, either by competitive bidding, or negotiation made by the contractor for work to be performed under a subcontract, including procurements of materials, or leases of equipment, each potential subcontractor or supplier will be notified by the contractor of the contractor's obligations under this contract and the Acts and the Regulations relative to Non-discrimination on the grounds of race, color, or national origin.
4. **Information and Reports:** The contractor will provide all information and reports required by the Acts, the Regulations, and directives issued pursuant thereto and will permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Recipient or the Washington State Department of Transportation to be pertinent to ascertain compliance with such Acts, Regulations, and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish the information, the contractor will so certify to the Recipient or the Washington State Department of Transportation, as appropriate, and will set forth what efforts it has made to obtain the information.
5. **Sanctions for Noncompliance:** In the event of a contractor's noncompliance with the Non-discrimination provisions of this contract, the Recipient will impose such contract sanctions as it or the Washington State Department of Transportation may determine to be appropriate, including, but not limited to:
 - a. withholding payments to the contractor under the contract until the contractor complies; and/or
 - b. cancelling, terminating, or suspending a contract, in whole or in part.
6. **Incorporation of Provisions:** The contractor will include the provisions of paragraphs one through six in every subcontract, including procurements of materials and leases of equipment,

unless exempt by the Acts, the Regulations and directives issued pursuant thereto. The contractor will take action with respect to any subcontract or procurement as the Recipient or the Washington State Department of Transportation may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided, that if the contractor becomes involved in, or is threatened with litigation by a subcontractor, or supplier because of such direction, the contractor may request the Recipient to enter into any litigation to protect the interests of the Recipient. In addition, the contractor may request the United States to enter into the litigation to protect the interests of the United States.

APPENDIX B

CLAUSES FOR DEEDS TRANSFERRING UNITED STATES PROPERTY

The following clauses will be included in deeds effecting or recording the transfer of real property, structures, or improvements thereon, or granting interest therein from the United States pursuant to the provisions of Assurance 4:

NOW, THEREFORE, the U.S. Department of Transportation as authorized by law and upon the condition that the Spokane Regional Transportation Council will accept title to the lands and maintain the project constructed thereon in accordance with Title 23, United States Code, the Regulations for the Administration of Washington State Department of Transportation, and the policies and procedures prescribed by the Federal Highway Administration of the U.S. Department of Transportation in accordance and in compliance with all requirements imposed by Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation pertaining to and effectuating the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252; 42 U.S.C. § 2000d to 2000d-4), does hereby remise, release, quitclaim and convey unto the Spokane Regional Transportation Council all the right, title and interest of the U.S. Department of Transportation in and to said lands described in Exhibit A attached hereto and made a part hereof.

(HABENDUM CLAUSE)

TO HAVE AND TO HOLD said lands and interests therein unto Spokane Regional Transportation Council and its successors forever, subject, however, to the covenants, conditions, restrictions and reservations herein contained as follows, which will remain in effect for the period during which the real property or structures are used for a purpose for which Federal financial assistance is extended or for another purpose involving the provision of similar services or benefits and will be binding on the (Spokane Regional Transportation Council, its successors and assigns.

The Spokane Regional Transportation Council, in consideration of the conveyance of said lands and interests in lands, does hereby covenant and agree as a covenant running with the land for itself, its successors and assigns, that (1) no person will on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination with regard to any facility located wholly or in part on, over, or under such lands hereby conveyed [,] [and]* (2) that the Spokane Regional Transportation Council will use the lands and interests in lands and interests in lands so conveyed, in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation, Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations and Acts may be amended [, and (3) that in the event of breach of any of the above-mentioned non-discrimination conditions, the Department will have a right to enter or re-enter said lands and facilities on said land, and that above described land and facilities will thereon revert to and vest in and become the absolute property of the U.S. Department of Transportation and its assigns as such interest existed prior to this instruction].*

(*Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to make clear the purpose of Title VI.)

APPENDIX C

CLAUSES FOR TRANSFER OF REAL PROPERTY ACQUIRED OR IMPROVED UNDER THE ACTIVITY, FACILITY, OR PROGRAM

The following clauses will be included in deeds, licenses, leases, permits, or similar instruments entered into by the Spokane Regional Transportation Council pursuant to the provisions of Assurance 7(a):

- A. The (grantee, lessee, permittee, etc. as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree [in the case of deeds and leases add "as a covenant running with the land"] that:
 - 1. In the event facilities are constructed, maintained, or otherwise operated on the property described in this (deed, license, lease, permit, etc.) for a purpose for which a U.S. Department of Transportation activity, facility, or program is extended or for another purpose involving the provision of similar services or benefits, the (grantee, licensee, lessee, permittee, etc.) will maintain and operate such facilities and services in compliance with all requirements imposed by the Acts and Regulations (as may be amended) such that no person on the grounds of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities.
- B. With respect to licenses, leases, permits, etc., in the event of breach of any of the above Non-discrimination covenants, Spokane Regional Transportation Council will have the right to terminate the (lease, license, permit, etc.) and to enter, re-enter, and repossess said lands and facilities thereon, and hold the same as if the (lease, license, permit, etc.) had never been made or issued.*
- C. With respect to a deed, in the event of breach of any of the above Non-discrimination covenants, the Spokane Regional Transportation Council will have the right to enter or re-enter the lands and facilities thereon, and the above described lands and facilities will there upon revert to and vest in and become the absolute property of the Spokane Regional Transportation Council and its assigns.*

(*Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.)

APPENDIX D

CLAUSES FOR CONSTRUCTION/USE/ACCESS TO REAL PROPERTY ACQUIRED UNDER THE ACTIVITY, FACILITY OR PROGRAM

The following clauses will be included in deeds, licenses, permits, or similar instruments/agreements entered into by Spokane Regional Transportation Council pursuant to the provisions of Assurance 7(b):

- A. The (grantee, licensee, permittee, etc., as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree (in the case of deeds and leases add, "as a covenant running with the land") that (1) no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities, (2) that in the construction of any improvements on, over, or under such land, and the furnishing of services thereon, no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination, (3) that the (grantee, licensee, lessee, permittee, etc.) will use the premises in compliance with all other requirements imposed by or pursuant to the Acts and Regulations, as amended, set forth in this Assurance.
- B. With respect to (licenses, leases, permits, etc.), in the event of breach of any of the above Non-discrimination covenants, Spokane Regional Transportation Council will have the right to terminate the (license, permit, etc., as appropriate) and to enter or re-enter and repossess said land and the facilities thereon, and hold the same as if said (license, permit, etc., as appropriate) had never been made or issued.*
- C. With respect to deeds, in the event of breach of any of the above Non-discrimination covenants, Spokane Regional Transportation Council will there upon revert to and vest in and become the absolute property of Spokane Regional Transportation Council and its assigns.*

(*Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.)

APPENDIX E

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the "contractor") agrees to comply with the following non-discrimination statutes and authorities; including but not limited to:

Pertinent Non-Discrimination Authorities:

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin); and 49 CFR Part 21.
- The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, (42 U.S.C. § 4601), (prohibits unfair treatment of persons displaced or whose property has been acquired because of Federal or Federal-aid programs and projects);
- Federal-Aid Highway Act of 1973, (23 U.S.C. § 324 et seq.), (prohibits discrimination on the basis of sex);
- Section 504 of the Rehabilitation Act of 1973, (29 U.S.C. § 794 et seq.), as amended, (prohibits discrimination on the basis of disability); and 49 CFR Part 27;
- The Age Discrimination Act of 1975, as amended, (42 U.S.C. § 6101 et seq.), (prohibits discrimination on the basis of age);
- Airport and Airway Improvement Act of 1982, (49 USC § 471, Section 47123), as amended, (prohibits discrimination based on race, creed, color, national origin, or sex);
- The Civil Rights Restoration Act of 1987, (PL 100-209), (Broadened the scope, coverage and applicability of Title VI of the Civil Rights Act of 1964, The Age Discrimination Act of 1975 and Section 504 of the Rehabilitation Act of 1973, by expanding the definition of the terms "programs or activities" to include all of the programs or activities of the Federal-aid recipients, sub-recipients and contractors, whether such programs or activities are Federally funded or not);
- Titles II and III of the Americans with Disabilities Act, which prohibit discrimination on the basis of disability in the operation of public entities, public and private transportation systems, places of public accommodation, and certain testing entities (42 U.S.C. §§ 12131-12189) as implemented by Department of Transportation regulations at 49 C.F.R. parts 37 and 38;
- The Federal Aviation Administration's Non-discrimination statute (49 U.S.C. § 47123) (prohibits discrimination on the basis of race, color, national origin, and sex);
- Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, which ensures Non-discrimination against minority populations by discouraging programs, policies, and activities with disproportionately high and adverse human health or environmental effects on minority and low-income populations;
- Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, and resulting agency guidance, national origin discrimination includes discrimination because of Limited English proficiency (LEP). To ensure compliance with Title VI, you must take reasonable steps to ensure that LEP persons have meaningful access to your programs (70 Fed. Reg. at 74087 to 74100);
- Title IX of the Education Amendments of 1972, as amended, which prohibits you from discriminating because of sex in education programs or activities (20 U.S.C. 1681 et seq.).

CONTACT INFORMATION

For questions on SRTC's Title VI Plan or procedures, please contact Michael Redlinger at mredlinger@src.org or at (509) 343-6370. For information on SRTC's work program or publications, including documents, data forecasting, maps, other information available for use, current public comment periods and meetings open to the public, go to www.src.org or call (509) 343-6370.

The WSDOT Office of Equal Opportunity is reachable by phone at (360) 705 7090. The OEO's Title VI email contact is TitleVI@wsdot.wa.gov.



LIMITED ENGLISH PROFICIENCY PLAN

September 2021
Title VI Coordinator: Michael Redlinger

INTRODUCTION

This *Limited English Proficiency Plan* addresses the Spokane Regional Transportation Council's (SRTC's) responsibility, as a recipient of funds from the United States Department of Transportation (USDOT), to take reasonable steps to ensure that Limited English Proficient (LEP) persons have meaningful access to the agency's programs and activities.

This plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., which states that no person 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 that receives federal financial assistance.

Additionally, Executive Order 13166 indicates that differing treatment based upon a person's inability to speak, read, write, or understand English is a type of national origin discrimination.

FOUR-FACTOR ANALYSIS

SRTC uses the following four-factor analysis to determine the extent of obligation and steps reasonable to take to ensure meaningful access to agency programs and activities by LEP persons:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of SRTC:

SRTC staff used data from the 2015-2019 American Community Survey to determine that 2.3% of Spokane County's population (age 5 years and older) speaks English less than very well. The same data indicates that approximately 11,410 individuals (age 5 years and older) in Spokane County speak English less than very well.

More recently, the 2020 decennial Census reported a countywide population of 539,339 residents. If the 2.3% value from ACS 2015-2019 is applied to newest population value (and to the entire population), approximately 12,405 people in SRTC's planning area may have limited English proficiency.

The B16001 data table, last released for Spokane County as part of the 2015 American Community Survey, highlights the diversity of Spokane County's LEP residents. That data indicates that over 30 different languages are spoken at home by Spokane County's limited English proficiency residents. Among this set, Spanish and Russian were most prevalent.

Among languages other than English, Spanish and Russian are most prevalent. Data from the 2019 American Community Survey indicates that approximately 3.17% of Spokane County households are Spanish-speaking. Of those, approximately 7.5% (or 0.24% of all households) record speaking English less than very well. The same dataset indicates that Russian and other Slavic languages are spoken in approximately 1.63% of Spokane County households. Notably, approximately 17.4% of these households (or 0.28% of all households) record speaking English less than very well. Due to large margins of error in the data, the numbers of LEP Spanish and Slavic-language-speaking households are considered statistically equivalent. A 2017 Spokane Regional Health District report confirms that Russian is the most prevalent among Slavic languages.

In 2019, SRTC also produced an internal, ArcGIS Online-based tool that identifies the prevalence of languages other than English in Spokane County Census Tracts. The tool is available for planners to review when conducting studies and other planning activities.

2. The frequency with which LEP Individuals come in contact with SRTC services:

SRTC staff reviewed the frequency of contact with LEP persons through committee meetings, public outreach, public meetings and open houses. To date, no requests for interpreters or translators have been received.

3. The nature and importance of the program, activity, or service provided by SRTC to people's lives:

The success of SRTC's programs is dependent on having as many participants as possible involved in planning and decision-making processes. As transportation affects where people live, employment opportunities and overall quality of life, it is critical that all Spokane County residents have a voice in the development of their future transportation system. Crucial SRTC activities include updates to the Metropolitan Transportation Plan, *Horizon 2040*, and the Transportation Improvement Program.

4. The resources available to SRTC and costs:

SRTC is committed to providing translation services to those who request them and translating materials as needed. SRTC's annual budget includes funds for services including translation. Verbiage was added to SRTC's website in 2016 in Spanish saying that the Metropolitan Transportation Plan is available for translation as requested. In 2019, an additional option was added to the SRTC website enabling users to translate entire website into Russian, Spanish, Vietnamese, or Tagalog.

LANGUAGE ASSISTANCE

SRTC makes language assistance available at no cost to Individuals. This assistance includes:

1. SRTC will provide, upon request and with at least 48 hours' notice, an in-person translator for open public meetings. Translation will be provided at no cost.
2. Translation of key documents. SRTC contracts with NWI Global to translate important documents, fliers, and other public materials into Russian and Spanish.
3. Online translation - while online translation services such as Google Translate are not supported by FHWA and FTA officials that SRTC works with, they can be used on short notice when there is not time to arrange for an in-person or telephone translator
4. "I Speak" cards taken to meetings and open houses.
5. User-friendly materials that are easy to understand such as infographics, visualizations and maps rather than written explanations
6. Notification of community groups and organizations that support LEP populations, as well as non-English media sources, when SRTC is notifying the community of opportunities for public comment or that new information is available.
7. SRTC's website, publications, newspaper ads, meeting agendas and news releases include a notification of the public's rights under Title VI and the availability of translation services.

MONITORING

SRTC documents activities and requests in order to evaluate current processes. The Title VI and LEP plan are updated as required or needed.