

# **EXHIBIT G**

**Garfield County Transportation Authority**

## **Title VI Plan Policy for the Federal Transit Administration and Washington State Department of Transportation**

**January 17, 2017**

**May 15, 2023 - updated**



## Introduction

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

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color and national origin in programs and activities receiving Federal financial assistance.

The Garfield County Transportation Authority, herein after called the “CTA”, is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.A. If you believe you have been subjected to discrimination under Title VI, you may file a complaint

## TITLE VI COMPLAINT PROCEDURES

**How to file a Title VI Complaint:** You may file a signed, written complaint up to one hundred and eighty (180) days from the date complainant became aware of the incident. The complaint should include the following information:

- Your name, mailing address, and how to contact you (i.e., telephone number, email address, etc.)
- How, when, where and why you believe you were discriminated against. Include the location, names and contact information of any witnesses.
- Other information that you deem significant.

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

**Garfield County Transportation Authority  
Po Box 23  
Pomeroy, WA 99347  
509-843-0200**

NOTE: GCTA encourages all complainants to certify all mail that is sent through the U.S. Postal Service and/or ensure that all written correspondence can be tracked easily. For complaints originally submitted by facsimile, an original, signed copy of the complaint must be mailed to the GCTA as soon as possible, but no later than 180 days from the alleged date of discrimination.

### What happens to my complaint after it is submitted to GCTA?

All complaints alleging discrimination based on race, color or national origin in a service or benefit provided by the GCTA will be directly addressed by the GCTA’s General Manager. The GCTA shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. Additionally, the GCTA shall make every effort to address all complaints in an expeditious and thorough manner.

In instances where additional information is needed for investigation of the complaint, the GCTA will contact the complainant in writing. Please note that in responding to any requests for additional

information, a complainant’s failure to provide the requested information may result in the administrative closure of the complaint.

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

Once sufficient information for investigating the complaint is received, GCTA will send a final written response to the complainant and advise the complainant of their right to 1) appeal within 7 calendar days of receipt of the final written decision from Garfield County Transportation, and/or 2) file a complaint externally with the U.S. Department of Transit and/or the Federal Transit Administration. Every effort will be made to respond to Title VI complaints within 60 working days of receipt of such complaints, if not sooner.

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

Organization Name and Address		
Washington State Department of Transportation Public Transit Division Attn: Title VI General Manager P O Box 47387 Olympia, WA 98504-47387	Federal Transit Administration Attn: Title VI Program General Manager East Building, 5 <sup>th</sup> Floor – TCR 1200 New Jersey Ave, SE Washington, DC 20590	U.S. Department of Justice Civil Rights Division Coordination and Review Section - NWB 950 Pennsylvania Avenue, NW Washington, DC 20530

**RECORD OF TITLE VI INVESTIGATIONS,  
COMPLAINTS OR LAWSUITS**

If the GCTA receives a complaint, FTA requires that all complaints are tracked with the following required information:

- Type of complaint, investigation, or lawsuit
- Date of complaint, investigation, or lawsuit
- A summary of the allegation(s)
- The status of the complaint, investigation, or lawsuit
- Actions taken in response to the complaint, investigation, or lawsuit

Information must be tracked until the complaint, investigation, or lawsuit has been closed. The records will then be stored according to state and federal record retention requirements. Tracked information will be reported to WSDOT as the grantor of the funds as required in the WSDOT “Guide to Managing your Public Transit Grants”.

## LIMITED ENGLISH PROFICIENCY (LEP) PLAN

The GCTA is committed to breaking down language barriers by implementing consistent standards of language assistance across its service area.

Census. The United States is home to millions of national origin minority individuals who are LEP. That is, their primary language is not English and they cannot speak, read, write or understand the English language at a level that permits them to interact effectively with recipients of Federal financial assistance. Because of language differences and the inability to effectively speak or understand English, persons with LEP may be subject to exclusion from programs or activities, experience delays or denials of services. These individuals may be entitled to language assistance with respect to a particular type of service. The federal government and those receiving assistance from the federal government must take reasonable steps to ensure that LEP persons have meaningful access to the programs, services, and information those entities provide. This will require agencies to establish creative solutions to address the needs of this ever-growing population of individuals, for whom English is not their primary language. According to 2020 Census Data, English is spoken by 98% of Garfield County's residents. Spanish represents 2% of the non-English speaking residents of Garfield County.

### ANALYSIS OF FACTORS

**Factor No. 1:** The number or proportion of LEP persons in the service area. Garfield County Transportation's jurisdiction covers Garfield County which is largely English speaking. 2% of the residents of Garfield County speak Spanish. The vast majority of the populations with which we do business (individuals wishing to ride transit) are proficient in English, so that LEP services are not normally required.

**Factor No. 2.** The frequency with which LEP individuals come into contact with the service. All contacts with GCTA are made through our office in Pomeroy, WA. In case we need translation services, we contact a volunteer or service. To date we have had no requests for service from anyone with LEP.

**Factor No. 3:** The nature and importance of service provided by the GCTA to LEP persons. GCTA provides important transit services to LEP persons through its Demand Response Service and Commuter Service. Garfield County encompasses 712.8 very rural miles. Without these services, LEP persons would lose an inexpensive transportation choice for transportation to work, shopping and important medical services.

**Factor No. 4.** The resources available. Garfield County Transportation's current in-house language capabilities are English. We currently have a retired teacher from the Pomeroy School District that volunteers if we need Spanish translation. The GCTA has a number of publications in both English and Spanish. We have Fliers and Comment policies in English and Spanish available in all of our vehicles.

## **IMPLEMENTATION PLAN**

GCTA currently has implemented its plan and will review it annually, including any contacts with LEP persons to determine the frequency of contacts, the language used, and how the contacts were handled. We identify LEP persons in the service area by ridership, telephone contact counts, and neighborhood demographics. We employ one Mobility General Manager. Bus schedules are printed in both English and Spanish. The GCTA Title VI policy and Complaint Forms are available in both English and Spanish and are available in on our office. The GCTA shall provide information to all passengers regarding the protections against discrimination afforded them by Title VI. The GCTA has established a statement of rights and a policy statement.

## **STAFF TRAINING**

Garfield County Transportation's staff has experience communicating in an ethnically diverse environment. Several employees have multi-lingual skills. Agency training and internal planning will continue to note the need to consider persons with limited English proficiency in communicating transportation information and providing language assistance for LEP persons to support and encourage their participation in the planning activities. Smart phone technology has also been used by GCTA employees and passengers to communicate and help inform LEP persons about participating in public transportation.

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

GCTA shall provide information to all passengers regarding the protections against discrimination afforded them by Title VI. The GCTA has established a statement of rights and a policy statement.

## **INCLUSIVE PUBLIC PARTICIPATION**

Community Outreach is a requirement of Title VI. Recipients shall seek out and consider the viewpoints of minority and low-income populations in the course of conducting public outreach. Recipients have wide latitude to determine what specific measures are most appropriate and should make this determination based on the composition of the affected population, the public involvement process, and the resources of the GCTA. GCTA has engaged the public in its planning and decision-making processes, as well as its marketing and outreach activities. In 2022, the public was invited to participate in these activities:

Transit Development Plan (TDP). The Transit Development Plan is a requirement of the Washington State Legislature. The Plan is prepared by individual Transit agencies and submitted to the State D.O.T. A summary document is prepared which shows the size of the fleet, costs, revenue, service revenue hours, revenue miles, expense and capital expenditures. Public hearings are held to obtain comments from the public on the TDP.

Coordinated Public Transit - Human Services Transportation Plan (CPT-HSTP). Another document called the CPT-HSTP is prepared by the Palouse Regional Transportation Planning Organization (PRTPO) and is used by transit agencies in Southeast Washington State. The CPT-HSTP provides background and overview information that addresses current regional transportation services, capital and improvement projects, and unmet needs in public transportation. This plan is necessary for grant

funding and is a roadmap for Palouse region agencies and other stakeholders. Multiple public meetings and events are held to obtain comments from the public on the CPT-HSTP.

Public Meetings: GCTA meetings, Palouse RTPO public meetings, and County Commission meetings.

Customer Complaint Process: Citizens may call our office at 509-843-0200 to file a complaint or comment. All complaints/comments are input into a database and then distributed to the relevant manager who researches the complaint and responds back to the citizen. The GCTA's complaint process was updated January 17, 2017.

### TITLE VI COMPLAINT FORM

Title VI of the 1964 Civil Rights Act requires that "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance." If you feel you have been discriminated against in transit services, please provide the following information in order to assist us in processing your complaint and sent it to:

Garfield County Transportation Authority  
695 Main St  
Po Box 23  
Pomeroy WA, 99347  
509-843-0200  
Fax: 509-843-3763

Please print clearly:

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City, State, Zip Code: \_\_\_\_\_

Telephone Number: \_\_\_\_\_(home) \_\_\_\_\_(cell) \_\_\_\_\_(message)

Person discriminated against: \_\_\_\_\_

Address of person discriminated against: \_\_\_\_\_

City, State, Zip Code: \_\_\_\_\_

Please indicate why you believe the discrimination occurred:

\_\_\_\_\_ race or color

\_\_\_\_\_ national origin

\_\_\_\_\_ income

\_\_\_\_\_ other

What was the date of the alleged discrimination? \_\_\_\_\_

Where did the alleged discrimination take place? \_\_\_\_\_

Please describe the circumstances as you saw it: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Please list any and all witnesses' names and phone numbers:

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What type of corrective action would you like to see taken?

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Please attach any documents you have which support the allegation. Then date and sign this form and send to the Title VI General Manager at the address listed on page 1 of this document.

\_\_\_\_\_  
Your signature

\_\_\_\_\_  
Print your name

\_\_\_\_\_  
Date

## **Outreach Efforts**

The GCTA has board approved public participation/public notification policies. In addition to the processes set out in this policy, staff will use the following techniques during its planning studies as deemed appropriate by staff.

- Presentations to professional, citizen and other organizations
- Articles in community newspapers
- Information conversations with individuals and small groups
- Interviews with individuals who are or may be affected by proposed plans
- User and non-user surveys
- Use of illustrative visualization techniques to convey the information including but not limited to, charts, graphs, photos, maps and the internet.

During any planning process the public is invited to contact the GCTA with comments and/or to request additional information. Requests can be made via telephone by contacting the GCTA at 509-843-0200.

Comments will be collected, documented and presented to the the GCTA Board of Commissioners.

## **Garfield County Public Participation Contact List**

Garfield County Hospital  
Garfield County Aging and Disability Resource Center  
Garfield County Senior Center  
Garfield County Health & Human Services  
Garfield County Medical Clinic  
Garfield County Department of Health  
Pomeroy Pharmacy  
Washington State Aging and Long Term Care  
Quality Behavioral Health  
Blue Mountain Action Council

## Attachment A

### Garfield County Transportation Authority Public Participation Plan

#### Purpose

The purpose of this Public Participation Plan (PPP) is to establish procedures that encourage the full participation of all citizens in the GCTA service area, including but not limited to low income and minority individuals, and those with limited English proficiency (LEP). While traditional means of soliciting public involvement may not reach such individuals, or might not allow for meaningful avenues of input, the intent of this effort is to take reasonable actions throughout the planning process to provide opportunities for historically under-served populations to participate.

This document will lay out procedures to provide opportunities for all area citizens to participate in the development of short and long-term plans for the GCTA system. Where appropriate, GCTA will make improvements to its public participation system.

A notice will be posted in local newspapers, noting the existence of this public participation plan and a copy will be sent, at a minimum, to the stakeholders identified in this document.

#### Goals and Objectives for the Public Participation Plan

The goal of GCTA is to offer opportunities for the engagement of all citizens of Garfield County Transportation's service area to participate in the development of short and long-term plans.

In support of this goal, our objectives are:

- To determine what non-English languages and other cultural barriers exist to public participation within the GCTA service area.
- To provide a general notification of meetings, particularly forums for public input, in a manner that is understandable to all populations in the area.
- To hold meetings in locations which are accessible and reasonably welcoming to all area residents, including, but not limited to, low-income and minority members of the public.
- To provide avenues for a two way flow of information and input from populations which are not likely to attend meetings
- To provide a framework of actions appropriate to various types of plans and programs, as well as amendments or alterations to any such plan or program.
- To use various illustrative visualization techniques to convey the information including but not limited to charts, graphs, photos, maps and the internet.
- Direct contact information for GCTA on the GCTA website: <https://garfieldcta.com>

## Attachment B

For Title VI Program Report-Public Outreach Efforts Conducted During 2020-2022:

Date of Event: March 2022

Event: Coordinated Public Transit - Human Services Transportation Plan

Purpose: Informative displays with open question & answer time with community outreach for transportation services to the Palouse region.

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Date of Event: August 2021 and August 2022

Event: National Night Out

Purpose: Marketing and community outreach to the Transportation service offered to our community.

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Date of Event: August 2021 & 2022

Event: TDP Report Public Meeting

Purpose: Open public meeting and public comment for future of transportation services to the community.

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Date of Event: May 2022

Event: Garfield County ADRC Benefits Fair

Purpose: Community outreach to provide transportation and other services to the community.

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Adopted on May 15, 2023 by the Board of Directors of Garfield County Transportation Authority.

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Board Member

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Date

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Board Member

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