



**Spokane Neighborhood Action
Partners**

**TITLE VI of the Civil Rights Act of 1964
Implementation Plan
For the Years 2021- 2023**

Reviewed and Approved by: Julie Honekamp
Julie Honekamp, CEO

Date: 03.29.2022

TITLE VI PLAN 2021-2023

Program Overview

Under grants from the Washington State Department of Transportation and with support from local communities, Spokane Neighborhood Action Partners (SNAP) provides intercity transportation in a two-county area, linking seniors and individuals with disabilities with needed services in Spokane.

Policy Statement. SNAP is committed to a policy of non-discrimination in the conduct of its business, including its Title VI responsibilities - the delivery of equitable and accessible transportation services. SNAP recognizes its responsibilities to the communities in which it operates and to the society it serves. It is SNAP's policy to utilize its best efforts to assure that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under its programs of transportation service delivery.

Objective:

Toward this end, it is SNAP's objective to:

- A. Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin;
- B. Promote the full and fair participation of all affected populations in transportation decision making;
- C. Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations;
- D. Ensure meaningful access to programs and activities by persons with limited English proficiency.

Responsibility. The responsibility for carrying out SNAP's Title VI program has been delegated to the SNAP Resource Rides Coordinator by the CEO. The SNAP Resource Rides Coordinator is responsible for the day-to-day operations of this program and will receive and investigate Title VI complaints; however, all managers, supervisors and employees share in the responsibility for making all of SNAP's Equity, Diversity and Inclusion initiatives including, SNAP's Title VI program, a success. SNAP will notify the public of their rights under Title VI through its website and notices available in its offices.

Low Income and Minority Demographics

The table below shows US Census Bureau data from the 2015-19 American Community Survey 5-Year Estimate of poverty status. The data shows that all areas served by SNAP programs have poverty rates greater than the state average.

Poverty Status in Last 12 Months for Persons over 5 Years Old

	Total Population	Population Below Poverty Level	Percent Below Poverty Level
Washington State	7,614,893	746,259	9.8%
Spokane County	522,798	67,440	12.9%
City of Spokane	222,081	38,420	17.3%
City of Spokane Valley	101,060	11,319	12.3%
Idaho State	1,787,065	200,151	11.2%
Kootenai County	165,697	16,570	10%
Post Falls	36,250	5,328	14.7%
Coeur D'Alene	52,414	7,757	14.8%

Data from the US Census Bureau 2015-19 American Community Survey 5-Year Estimates, appearing in the following table, shows the minority population in the areas served by SNAP.

Total Population by Race

	Spokane County		City of Spokane		City of Spokane Valley		Kootenai County		Post Falls		Coeur d'Alene	
Total Population	522,798		222,081		101,060		165,697		36,250		52,414	
White	464,767	88.9%	188,103	84.7%	90,752	89.8%	156,584	94.5%	33,821	93.3%	48,955	93.4%
Black or African America	10,455	2.0%	5,108	2.3%	1,213	1.2%	663	.4%	109	.3%	157	.3%
American Indian & Alaska Native	9,410	1.8%	3,997	1.8%	1,112	1.1%	2,154	1.3%	181	.5%	943	1.8%
Asian	12,547	2.4%	5,996	2.7%	1,516	1.5%	1,491	.9%	363	1.0%	629	1.2%
Native Hawaiian & Pacific Islander	3,137	.6%	1,998	.9%	505	.5%	166	.1%	36	.1%	0	0%
Other	524	.1%	3,775	1.7%	1,920	1.9%	331	.2%	181	.5%	314	.6%
Two or More Races	21,958	4.2%	13,104	5.9%	4,042	4.0%	4,308	2.6%	1,559	4.3%	1,415	2.7%

Inclusive Public Participation

Title VI requires community outreach that seeks out and considers the viewpoints of minority and low-income populations regarding the services SNAP offers. The activities described below detail SNAP's outreach activities since the last update of this plan and will continue to form the basis of outreach efforts in the coming years.

Coordinated Public Transit-Human Services Transportation Plan. As part of the WSDOT application process for Community Shuttles funding, SNAP participated in the development of regional Coordinated Public Transit-Human Services Transportation Plans. These plans are locally developed and identify the transportation needs of individuals with disabilities, older adults, and people with low incomes, provide strategies for meeting those local needs, and prioritize transportation services for funding and implementation. Community outreach was a major emphasis of plan development, and included stakeholder meetings, community meetings, and surveys.

Spokane Transportation Collaborative. In May 2019, SNAP began partnering with SMS to establish the Spokane Transportation Collaborative. The Collaborative works to assess transportation needs among Spokane County's senior and disabled populations and look for ways to address gaps in service. Agencies representing people with low income, minorities, and LEP populations serve on the Collaborative and on its Steering Committee. As part of its work, public meetings and workshops are held throughout the county to assess need and provide information about available transportation resources.

Customer Complaint and Comment Process. Stakeholders have several methods for communicating comments or complaints:

- By phone at 509-456-7627
- By phone at 509-319-3050
- Via the SNAP website
- Via email at SRTH@snapwa.org

All complaints are logged and distributed to the relevant manager who researches each complaint and responds back to the complainant. Comments and suggestions are also forwarded to the relevant manager for possible action.

Surveys. SNAP conducts periodic client satisfaction surveys to identify success and barriers to our services. These surveys are conducted via kiosks at each SNAP office. Additionally, from time to time individual programs, including transportation services, conducts more in-depth surveys with their client population to determine satisfaction with services.

Outreach. SNAP's staff provides information regarding SNAP services including our transportation services at community events in our area. These events include but are not limited to energy fairs, Unity in the Community, Food Bank distributions and backpack distribution events.

Minority and LEP Populations Outreach Activities

The following are outreach activities to minority and LEP populations accomplished since the last update:

Activity
Added a translation application to www.snapwa.org that will transcribe services listed on SNAP's website including transportation services in over 55 languages.
Added an accessibility application to www.snapwa.org for those who may be visually impaired.
Worked closely with Homeless Outreach team to ensure those individuals with homes have access to transportation to seek medical services.
Participated in transportation summits (2) with 38 stakeholders, including agencies representing low income, minority, and LEP, to collect & prioritize data about barriers to access, complex needs/ gaps in services, solutions to cultural disparities, and geographic service deficiencies
Conducted a Community Needs Assessment that engaged community partners and clients in a series of surveys to determine which community needs (including transportation) were most important to them.
Participated in the Spokane Collaborative Equity Workgroup which brings together a wide array of service partners focused on improving service delivery for Medicaid (low-income) recipients.
Conducted outreach to Spokane City and County Library systems.
Conducted Outreach to various Senior Centers such as: Mid-City Concerns, Corbin Senior Activity Center, Hillyard Senior Activity Center
Conducted Outreach to various Community Centers including Northeast Community Center, West Central Community Center and East Central Community Center
Conducted outreach with community partners such as Cancer Can't, Long Term Care Ombudsman, Aging and Long-Term Care and the Community Health Worker Network

The following are planned outreach activities to minority and LEP populations:

- Develop targeted relationships with teachers and programs at Spokane Falls Community College, Spokane Community College, and Eastern Washington University, North Idaho College
- Conduct outreach to community groups and organizations such as The NATIVE Project, Latinos in Spokane, Asian Pacific Islander Coalition of Spokane, the Carl Maxey Center, and the Spokane NAACP and similar organizations in Kootenai County, Idaho.
- Staff information booth at LEP and minority population outreach events

Limited English Proficiency Plan

Policy Statement. Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., provides that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives Federal financial assistance. Title VI and its implementing regulations require that FTA recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who have limited English proficiency (LEP). A person with LEP is one who does not speak English as their primary language and who has a limited ability to read, speak, write or understand English.

LEP Assessment. SNAP conducted an LEP assessment for the service area by using US Census Bureau estimates based on the 2019 American Community Survey of the US census and consultation with community organizations, including SNAP staff. SNAP conducted the “four-factor analysis” per the U.S. Department of Transportation LEP guidance. The results are as follows:

1. *Determine the number of LEP persons eligible to be served or likely to be encountered by a program, activity or service.* SNAP interviewed operations staff and found that the transportation program is rarely used by LEP residents. Census information confirms that the areas served by SNAP routes have a small number of residents who lack proficiency in English.

2015-19 US Census Estimate Language Spoken at Home by Persons over 5 Years Old

	Total Population	Spanish-Speak English Less than Very Well		Other Indo-European-Speak English Less than Very Well		Asian/Pacific Islander-Speak English Less than Very Well		Other Languages-Speak English Less than Very Well	
Spokane County	474,707	3,019	.6%	4,444	.9%	3,472	.7%	831	.2%
City of Spokane	204,111	1,154	.6%	2,395	1.2%	1,958	1.0%	4480	.2%
City of Spokane Valley	90,929	935	1.0%	788	.9%	530	.6%	240	.3%
Kootenai County	147,913	878	.6%	304	.2%	179	.1%	51	0%
Post Falls	30,291	125	.4%	81	.3%	85	.3%	45	.1%
Coeur d’Alene	47,141	407	.9%	80	.2%	49	.1%	0	0%

2. *Determine the frequency with which LEP persons come into contact with our program.* SNAP consulted program staff about LEP contacts and found them to be rare. There have been no LEP concerns raised from clients of SNAP's transportation programs when conducting outreach.

3. *Determine the importance of the program, activity or service to people's lives.* Transportation to and from medical appointments for seniors and individuals with disabilities is of great importance. During SNAP's 2019 Community Needs Assessment transportation was identified as an issue key to our client population. The number of individuals with limited English proficiency is minimal in our service area but we continue to make resources available to serve this population in meeting these critical transportation needs.

4. *Determine the resources available and cost.* SNAP has the following resources for LEP persons:

- Interpretation services are free of charge upon request by calling (509) 456-7627. SNAP contracts with Spokane International Translation and ASAP Translation to provide interpretation services. Cost: \$13.75-\$17 per 15 minutes.
- SNAP has contracted with ASAP Translation for document translation. Documents can be translated into English, Russian, Vietnamese and Marshallese. Cost: \$.10-\$.30 per word.
- SNAP has several bi-lingual staff in Spanish, Russian and American Sign Language available to help as needed. No cost
- SNAP has added a translation widget to its website. No Cost
- SNAP has added an accessibility widget to its website. Cost: \$490 per year

All staff members are trained during program onboarding to provide timely and reasonable language assistance, including on the use of the translation services.

Clients are notified of these available options when calling SNAP, visiting a SNAP office and speaking with a staff member or when visiting SNAP's website. Staff also have access to tools such as posters to help clients identify which language they speak so proper translation services can be provided. Additionally, the Title VI notices posted in SNAP's office includes a phone number to call if translation/information needs to be provided in a different language. That message is provided in Spanish, Vietnamese and Russian.

SNAP believes it has taken responsible steps to ensure quality access for LEP persons to its transportation programs and does not anticipate implementing any further measures to improve LEP access at this time but will continue to grow and build relationships with LEP providers and will make adjustments as needed.

Monitoring and Updating the LEP Plan. This plan is designed to be flexible and easily updated. SNAP will follow the Title VI program update schedule for monitoring and updating the LEP plan.

Each update should examine all plan components such as:

- How many LEP persons were encountered?
- Were their needs met?
- What is the current LEP population in the service area?
- Has there been a change in the languages needing translation services?
- Is there still a need for continued language assistance for previously identified programs? Are there other programs that should be included?
- Have SNAP's available resources, such as technology and staff changed?
- Were there any complaints received?

Safe Harbor Provision

According to the US Department of Justice's (DOJ) Safe Harbor Provision, adopted by US Department of Transportation (DOT), a recipient of federal funds will provide written translation of vital documents for language when the LEP population constitutes five percent (5%) or 1,000 persons of the total population served by the agency. As of the 2019 ACS 5-year estimates, Russian, Spanish and Vietnamese qualify as "Safe Harbor" languages in Spokane County and SNAP will make vital documents available in those languages.

Transit-Related Committees, Councils and Boards

Title VI regulations require that the Title VI plan include a table depicting the membership of any transit-related non-elected committees, councils, and boards, broken down by race, and the process the agency uses to encourage the participation of minorities on such committees. SNAP has no transit-related non-elected committees, councils, or boards.

Equity Analysis of Facilities

Title VI regulations require that the Title VI plan include an equity analysis if the agency has constructed a facility, such as a vehicle storage facility, maintenance facility, or operations center. SNAP has not constructed any such facilities that would require a Title VI equity analysis.

Title VI Notice to the Public

To comply with 49 CFR 21.9(d), SNAP and its sub-recipients must provide information to beneficiaries regarding their Title VI obligations and inform beneficiaries of the protections against discrimination afforded them by Title VI. SNAP has established a policy statement to inform individuals of their Title VI rights and posts this statement in its offices. This notice has been posted at SNAP's Website <http://www.snapwa.org/TitleVI>. A link to the Title VI policy can also be found at www.snapwa.org towards the bottom of the homepage.

Non-Discrimination Notice. SNAP provides equal access to its programs without regard to gender, religion, disability, sexual orientation, age or any other protected class. In accordance with Title VI of the Civil Rights Act of 1964, SNAP does not discriminate on the basis of race, color, or national origin.

For more information on your rights or the procedures to file a discrimination complaint, or to request this information in an accessible format, please contact the SNAP Resource Rides Coordinator at (509) 456-7627 or the SNAP office at 3102 W. Whistalks Way, Spokane, WA 99224.

If information is needed in another language, contact (509) 456-7627

Si necesita información en otro idioma, comuníquese al (509) 456-7627

Для получения информации на другом языке звоните по тел. (509) 456-7627

Nếu quý vị cần thông tin bằng một ngôn ngữ khác, xin vui lòng gọi số (509) 456-7627

Title VI Complaints

Title VI Complaint Procedures. SNAP will communicate to anyone wishing to file a Title VI complaint that if he or she believes that he or she has been excluded from participation in, denied the benefits of, or subjected to discrimination based on race, color or national origin under SNAP's programs of transportation service delivery, he or she may file a complaint with the SNAP at 3102 W. Whistalks Way, Spokane, WA 99224. A Civil Rights Complaint Form has been developed for this purpose (attached).

All complaints will be investigated promptly. Reasonable measures will be undertaken to preserve any information that is confidential. SNAP will review every complaint, and when necessary, assign a neutral party to investigate. At a minimum the investigation will:

- Identify and review all relevant documents, practices and procedures;
- Identify and interview persons with knowledge of the Title VI violation, i.e., the person making the complaint; witnesses or anyone identified by the Complainant; anyone who may have been subject to similar activity, or anyone with relevant information.

Upon completion of the investigation, SNAP will complete a final report for the Director of Mission Support, CEO and COO. If a Title VI violation is found to exist, remedial steps as appropriate and necessary will be taken immediately. The Complainant will also receive a final report. The investigation process and final report should take no longer than thirty (30) business days. If no violation is found and the complainant wishes to appeal the decision, he or she may appeal directly to the Chief Executive Officer 3102 W. Whistalks Way, Spokane, WA, 99224.

The complainant also has the right to file a complaint or lawsuit with the following organizations:

Organization Name and Address			
Spokane Transit Authority Attn: STA Ombudsman 1230 West Boone Spokane WA, WA 99201	Washington State DOT Public Transportation Division Attn:Title VI Coordinator P O Box 47387 Olympia, WA 98504- 47387	Federal Transit Administration Attn:Title VI Program Coordinator East Building, 5 th Floor-- TCR 1200 New Jersey Ave, SE Washington, DC 20590	U.S. Dept of Justice Civil Rights Division Coordination and Review Section NWB 950 Pennsylvania Avenue NW Washington, DC 20530

Record Keeping. The SNAP Resource Rides Coordinator shall maintain a log of Title VI complaints, including lawsuits, received from this process which name SNAP or any of the above- named organizations and shall include the date the complaint was filed; a summary of the allegations; the status of the complaint; and actions taken by SNAP in response to the complaint. The log shall include investigations by outside agencies. The log and related records shall be kept according to federal and state record retention requirements, but at least six years from the closure of the grant project or the useful life of equipment, whichever is applicable.

Title VI Complaints Received. SNAP has not been the subject of any civil rights investigations, complaints or lawsuits since the last update of the Title VI plan.

Protection from Retribution. Customers should be able to make complaints without fear of retribution. If a customer feels that s/he is being treated unfairly in response to a Complaint, s/he may contact the Chief Executive Officer.

Spokane Neighborhood Action Partners Title VI Complaint Form

SNAP does not discriminate in the provision of service on the basis of race, color, and national origin.

Should you require any assistance in completing this form, please let us know.

Complete and return this form to:

Ride to Health
SNAP
3102 W. Whistalks Way
Spokane, WA 99224

(Please Type or Print Clearly)

1. Complainant's name

2. Address

3. City, State, Zip code

4. Home phone number (____)_____ (Cell or mobile number) (____)_____

5. Email address

6. Are you the Complainant? ___ Yes ___ No

If no, Your name

Relationship to the Complainant

Phone (____)_____ Cell (____)_____

Email _____

Does the Complainant know you are filing this complaint? ___ Yes ___ No

7. Which of the following best describes the reason you believe the alleged discrimination took place?

Select all that apply. Was it because of your:

a. Race

b. Color

c. National Origin

8. Date of alleged discrimination (month/day/year)

9. In your own words, describe the alleged discrimination. Explain what happened and who you believe was responsible. Please use the back of this form if additional space is required.

10. Please give the name, mailing address, home phone number, and cell phone number for anyone who witnessed the alleged discrimination.

11. What would you consider an appropriate resolution to your complaint?

12. Have you filed this complaint with any other agency? ___ Yes ___ No

Agency Name

Agency Contact Person/Phone

13. Please sign below. You may attach any written materials or other information that you think is relevant to your complaint.

Complainant's Signature

Date (month/day/year)

Within 15 working days of receiving the completed complaint, SNAP will acknowledge receipt of the complaint in writing. The letter will include information about the investigative steps to be taken and a timeline for resolution. If additional information is needed from the complainant, SNAP will request that information be provided in writing to append to the original complaint. A final letter of resolution will be sent to the complainant on completion of the investigation.

Upon request, alternative formats of this document will be produced for people who need accommodations. Call (509)456-7627