

City of Pullman
Title VI Plan

Related to
Transportation Planning and Transportation Improvements

Submitted to:
Federal Transit Administration
Region 10
915 Second Avenue
Seattle, WA 98174-1002

October 20, 2009

RECIPIENT INFORMATION

RECIPIENT: City of Pullman, Washington
Rural Transit Agency (population under 200,000)

SUBMITTAL DATE: October 20, 2009

EXPIRATION YEAR: 2012

CONTACT INFORMATION:

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Human Resources Director
City of Pullman
325 SE Paradise St.
Pullman, WA 99163
karen.sires@pullman-wa.gov
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I. PROVISION OF TITLE VI ASSURANCES

The City of Pullman hereby certifies that, as a condition of receiving Federal financial assistance under the Urban Mass Transportation Act of 1964, as amended, it will ensure that:

- a. The City of Pullman shall submit on an annual basis, their Title VI Assurance, as part of their annual Certification and Assurance submission to the FTA.
- b. No person, on the basis of race, color, or national origin, will be subjected to discrimination in the level and quality of transportation services and transit-related benefits.
- c. The City of Pullman will compile, maintain, and submit in a timely manner, Title VI information required by FTA Circular 4702.1A and in compliance with the Department of Transportation's Title VI Regulation, 49 CFR, Part 21.7.
- d. The City of Pullman will make it known to the public that those persons or persons alleging discrimination on the basis of race, color, or national origin as it relates to the provision of transportation services and transit-related benefits may file a complaint with the Federal Transit Administration and/or the U.S. Department of Transportation.

II. TITLE VI COMPLIANCE HISTORY

- a. There are no outstanding lawsuits or complaints naming the City of Pullman which allege discrimination on the basis of race, color or national origin with respect to service or other transit benefits.
- b. There are no pending applications for Federal financial assistance to the City of Pullman other than those being submitted to the Federal Transit Administration (FTA). Currently Pullman is applying for Section 5311 & 5309 funding through the FTA. Pullman has received Federal financial assistance by way of an American Recovery and Reinvestment Act (ARRA) grant for a pavement rehabilitation project on College Hill.
- c. During the course of the last three (3) years, there have not been any civil rights compliance review activities conducted with respect to the City of Pullman and, to the best of our knowledge, there are not presently any ongoing civil rights compliance review activities being conducted with respect to the City of Pullman.
- d. There are currently no pending construction projects which would negatively impact minority communities being performed by the City of Pullman.

III. INCORPORATION OF THE PROGRAM

The City of Pullman (hereinafter referred to as "COP" or "Recipient") hereby agrees that, as a condition to receiving any Federal financial assistance from the Department of Transportation, it will comply with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C. 2000d-42 U.S.C. 2000d-4 (hereinafter referred to as the "Act"), and all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-Assisted Programs of the Department of Transportation - Effectuation of Title VI of the Civil Rights Act of 1964 (hereinafter referred to as the "Regulations"), and other pertinent directives. 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 the Department of Transportation, including the Federal Transit Administration, and HEREBY GIVES ASSURANCE THAT it will promptly take any measures necessary to effectuate this agreement. This assurance is required by subsection 21.7(a) of the Regulations.

More specifically, and without limiting the above general assurance, the Recipient hereby gives the following specific assurances with respect to its Federal Transit Administration program:

- a. That the Recipient agrees that each "program" and each "facility", as defined in subsections 21.23(e) and 21.23(b) of the Regulations will be (with regard to a "program") conducted, or will be (with regard to a "facility") operated, in compliance with all requirements imposed by, or pursuant to, the Regulations.
- b. That the Recipient shall insert the following notification in all solicitations for bids for work or material subject to the Regulations and made in connection with all Federal Transit Administration programs and, in adapted form in all proposals or negotiated agreements:

The City of Pullman, in accordance with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C. 2000d to 2000d-4 and Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-Assisted Programs of the Department of Transportation issued pursuant to such Act, hereby notifies all bidders/proposers that it will affirmatively insure that in any contract entered into pursuant to this advertisement, disadvantaged business enterprises will be afforded full opportunity to submit bids in response to the invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award.

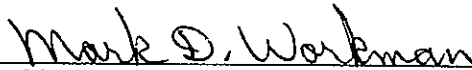
- c. That the Recipient shall incorporate the appropriate clauses, as required in the Certifications and Assurances, into every contract subject to this Act and the Regulations.
- d. That the Recipient shall incorporate the appropriate clauses, as required in the Certifications and Assurances, as a covenant running with the land, in any deed from the United States affecting a transfer of real property, structures, or improvements thereon, or interest herein.
- e. That where the Recipient receives Federal financial assistance to construct a facility, or part of a facility, the assurance shall extend to the entire facility and facilities operated in connection therewith.
- f. 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 shall extend to rights to space on, over or under such property.
- g. That the Recipient shall include the appropriate clauses, as required by the Certifications and Assurances, as a covenant running with the land, in any future deeds, leases, permits, licenses, and similar agreements entered into by the Recipient with other parties: (a) for the subsequent transfer of real property acquired or improved under Federal Transit Administration programs; and (b) for the construction or use of, or access to, space on, over, or under real property acquired, or improved under Federal Administration programs.
- h. 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.
- i. The Recipient shall provide for such methods of administration for the programs 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 interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Act, the Regulations and this assurance.

- j. The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Act, the Regulations, and this assurance.
- k. The Recipient assures that the level and quality of transit service and related benefits are provided in a manner consistent with Title VI of the Civil Rights Act of 1964.

THESE ASSURANCES are given in consideration of, and for the purpose of, obtaining any and all Federal grants, loans, contracts, property, discounts or other Federal financial assistance extended after the date hereof to the recipient by the Department of Transportation under the Federal Administration and is binding on it, other recipients, subgrantees, contractors, subcontractors, transferees, successors in interest and other participants in the Federal Transit Administration programs.

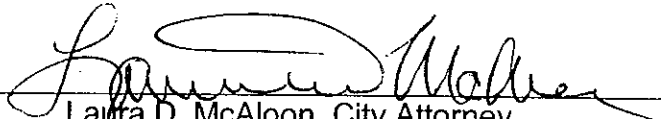
The person(s) whose signature appears below, are authorized to sign these assurances on behalf of the grant applicant or recipient.

Date: 10/22/09



Mark D. Workman, P.E., Public Works Director
City of Pullman

Date: 10/22/09



Laura D. McAloon, City Attorney
City of Pullman

IV. GENERAL GUIDELINES/REQUIREMENTS

a. Annual Certification and Assurance

As stated in Section I, COP shall submit annually, their Title VI assurance, as part of their annual Certification and Assurance submission to the FTA.

b. Complaint Procedures

In compliance with 49 CFR Section 21.9(b), COP has developed procedures for investigating and tracking Title VI complaints filed against them. Such procedures shall be made available to the public upon request. COP's complaint procedures and complaint form are contained herein as **APPENDIX A**.

c. Record Title VI Activities

In compliance with 49 CFR Section 21.9(b), COP shall prepare and maintain a list of any active investigations conducted by entities other than the FTA, lawsuits, or complaints naming COP that allege discrimination on the basis of race, color, or nation origin. Such list shall include:

- 1) Date the investigation, lawsuit, or complaint was filed;
- 2) Summary of the allegation(s);
- 3) The status of the investigation, lawsuit, or complaint; and
- 4) Actions taken by the COP in response to the investigation, lawsuit or complaint.

d. Access for LEP Persons

COP shall take steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP). COP will assist persons with limited English proficiency to participate in the transportation planning process. COP Staff will make every effort to provide translators and document translation, where feasible, upon request. COP's Limited English Proficiency (LEP) Plan is contained herein as **APPENDIX B**.

e. Public Notification

In compliance with 49 CFT Section 21.9(d), COP shall provide information to the public regarding their Title VI obligations and apprise members of the public of the protections against discrimination afforded to them by the Title VI. COP complaint procedures and public notification information are contained herein as **APPENDIX A.**

f. Additional Information

COP acknowledges that, at the discretion of the FTA, information other than that which is required by FTA C 4702.1A, may be requested in writing of COP, to investigate complaints of discrimination or to resolve concerns about possible noncompliance with Title VI.

g. Timely Submission

COP acknowledges that their Title VI submissions and/or updates thereto, shall be supplied to their FTA Regional Office once every three (3) years. The submission shall include, but is not limited to:

- 1) A summary of public outreach and involvement activities undertaken since the last submission and a description of steps taken to ensure that minority and low-income people had meaningful access to these activities;
- 2) COP's process for persons with limited English proficiency (LEP);
- 3) Title VI Complaint and Tracking procedures;
- 4) A list of any Title VI investigations, complaints or lawsuits filed since the last submission; and
- 5) A copy of COP's public notice regarding Title VI compliance and public access and instructions to COP Title VI complaint procedures.

Portions of the Plan which have not changed since the last submission will not be resubmitted, however, COP shall include a statement to this effect in lieu of copies of the original documents in order to eliminate redundancy in resubmissions.

h. Environmental Analysis of Construction Projects

COP shall integrate an environmental justice analysis into their National Environmental Policy Act (NEPA) documentation of construction projects of which require NEPA. If a Categorical Exclusion (CE) is performed, COP shall

complete the FTA's standard CE check-list which includes a section on community disruption and environmental justice. While preparing an Environmental Assessment (EA) or Environmental Impact Statement (EIS), COP shall integrate into their documents, the following:

- 1) A description of the low-income and minority population within the study area affected by the project, and a discussion of the method used to identify this population;
- 2) A discussion of all adverse effects that would affect the identified minority and low-income population;
- 3) A discussion of all positive effects that would affect the identified minority and low-income population;
- 4) A description of all mitigation and environmental enhancement actions incorporated into the project to address the adverse effects, including, but not limited to, any special features of the relocation program that go beyond the requirements of the Uniform Relocation Act and address adverse community effects such as separation or cohesion issues, and the replacement of the community resources destroyed by the project, if applicable;
- 5) A discussion of the remaining effects, if any, and why further mitigation is not proposed; and
- 6) For projects that traverse predominantly minority and low-income and predominantly non-minority and non-low-income areas, a comparison will be completed of mitigation and environmental enhancement actions between the two stated areas. If there is no basis for such a comparison, COP shall describe why this is so.

i. Public Participation


The COP shall seek out and consider viewpoints of minority, low-income, and LEP populations in the course of conducting public outreach and involvement activities in regards to proposed transportation decisions. COP shall make every effort to include the following practices:

- 1) Coordination with individuals, institutions, or organizations and implementing community-based public involvement strategies to reach out to members in the affected minority and/or low-income communities;
- 2) Provision of opportunities for public participation through means other than written communication, such as personal interviews or use of audio or video recording devices to capture oral comments;

- 3) Utilization of locations, facilities and meeting times that are convenient and accessible to low-income and minority communities;
- 4) Utilization of different meeting sizes or formats, or varying the type and number of news media used to announce public participation opportunities; and
- 5) Implementation of DOT's policy guidance regarding COP's responsibilities to LEP persons.

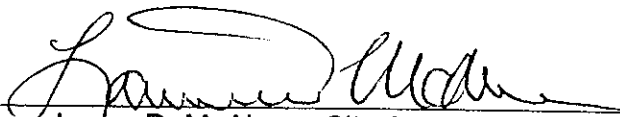
The person(s) whose signature appears below, are authorized to sign on behalf of the grant applicant or recipient.

Date: 10/22/09



Mark D. Workman, P.E., Public Works Director
City of Pullman

Date: 10/22/09



Laura D. McAloon, City Attorney
City of Pullman

APPENDIX A
Public Notice of Rights / Complaint Process

TITLE VI PUBLIC NOTICE OF RIGHTS / COMPLAINT PROCESS
CITY OF PULLMAN, WASHINGTON (COP)

Public Notice of Rights

The following statement shall be posted on site at the COP transit office, on the COP website (www.pullman-wa.gov); permanently displayed on public transit vehicles; and other appropriate materials made available to the public: (*Documents will be translated into languages other than English, upon request.*)

Non-Discrimination - Your Rights Under Title VI of the Civil Rights Act of 1964

The United States Department of Transportation (DOT) ensures full compliance with Title VI of the Civil Rights Act of 1964 by prohibiting discrimination against any person on the basis of race, color or national origin in the provisions of benefits and services resulting from federally assisted programs and activities. Any person, who believes the City of Pullman (COP) has violated his /her Title VI protections, should contact the COP at 509-338-3207 karen.sires@pullman-wa.gov. COP has also developed a policy to assist individuals who are Limited English Proficient (LEP).

Translation services in order to assist LEP individuals shall be made available to COP's customers upon request. COP's Title VI policy, complaint procedures and LEP Plan shall be made available upon request by contacting the COP Human Resources Director at the above-noted information.

For federal Title VI information please contact the Federal Transit Administration (FTA), Region 10 at 206-220-4462. Federal Title VI information, including filing complaints, can also be accessed on the FTA web site at: www.fta.dot.gov.

Title VI Information, Limited English Proficient (LEP) information and Complaint Process (for printed materials, website, and other mediums upon request)

The City of Pullman (COP) grants all citizens equal access to all its transportation services. It is further the intent of the COP that all citizens are aware of their rights to such access. This is designed to serve as an educational tool for citizens so that they may understand one of the civil rights laws that protect their benefit of the COP programs and services, specifically, as it relates to Title VI of the Civil Rights Act of 1964.

What is Title VI?

Title VI is a section of the Civil Rights Act of 1964 requiring 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 subjected to discrimination under any program or activity receiving federal financial assistance."

Note that Title VI does not address gender discrimination. It only covers race, color and national origin. Other Civil Rights laws prohibit gender discrimination.

What is LEP?

As part of Title VI requirements, the COP has developed a Limited English Proficiency (LEP) Plan to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to COP services as required by Executive Order 13166 "Improving Access to Services for Persons With Limited English Proficiency," reprinted at 65 FR 50121 (August 16, 2000). A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

COP's Complaint and Investigation Procedures

These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990, for alleged discrimination in any program or activity administered by the COP.

APPENDIX A (Continued)
TITLE VI PUBLIC NOTICE OF RIGHTS / COMPLAINT PROCESS
CITY OF PULLMAN, WASHINGTON (COP)

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. Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation meeting(s) between the affected parties and the COP may be utilized for resolution. Any individual, group of individuals or entity that believes they have been subjected to discrimination prohibited under Title VI and related statutes may file a complaint.

The following measures will be taken to resolve Title VI complaints:

- 1) A formal complaint must be filed within 180 days of the alleged occurrence. Complaints shall be in writing and signed by the individual or his/her representative, and will include the complainant's name, address and telephone number; name of alleged discriminating official, basis of complaint (race, color, national origin, sex, disability, age), and the date of alleged act(s). A statement detailing the facts and circumstances of the alleged discrimination must accompany all complaints.

The COP strongly encourages the use of the attached **COP Title VI Complaint Form** when filing official complaints.

The preferred method is to file your complaint in writing using the **COP Title VI Complaint Form**, and sending it to:

Title VI Coordinator
Human Resources Director
City of Pullman
325 SE Paradise Street
Pullman, WA 99163

- 2) In the case where a complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to the COP Title VI Coordinator. Under these circumstances, the complainant will be interviewed, and the COP Title VI Coordinator will assist the Complainant in converting the verbal allegations to writing.
- 3) When a complaint is received, the Title VI Coordinator will provide written acknowledgment to the Complainant, within ten (10) days by registered mail.
- 4) If a complaint is deemed incomplete, additional information will be requested, and the Complainant will be provided 60 business days to submit the required information. Failure to do so may be considered good cause for a determination of no investigative merit.
- 5) Within 15 business days from receipt of a complete complaint, the COP will determine its jurisdiction in pursuing the matter and whether the complaint has sufficient merit to warrant investigation. Within five (5) days of this decision, the Title VI Coordinator or his/her authorized designee will notify the Complainant and Respondent, by registered mail, informing them of the disposition.
 - a. If the decision is not to investigate the complaint, the notification shall specifically state the reason for the decision.

APPENDIX A (Continued)

TITLE VI PUBLIC NOTICE OF RIGHTS / COMPLAINT PROCESS
CITY OF PULLMAN, WASHINGTON (COP)

- b. If the complaint is to be investigated, the notification shall state the grounds of the COP's jurisdiction, while informing the parties that their full cooperation will be required in gathering additional information and assisting the investigator.
- 6) When the COP does not have sufficient jurisdiction, the Title VI Coordinator or his/her authorized designee will refer the complaint to the appropriate State or Federal agency holding such jurisdiction.
- 7) If the complaint has investigative merit, the Title VI Coordinator will instruct the Transit Manager or his/her authorized designee to fully investigate the complaint. A complete investigation will be conducted, and an investigative report will be submitted to the Title VI Coordinator within 60 days from receipt of the complaint. The report will include a narrative description of the incident, summaries of all persons interviewed, and a finding with recommendations and conciliatory measures where appropriate. If the investigation is delayed for any reason, the Title VI Coordinator will notify the appropriate authorities, and an extension will be requested.
- 8) The Title VI Coordinator or his/her authorized designee will issue letters of finding to the Complainant and Respondent within 90 days from receipt of the complaint.
- 9) If the Complainant is dissatisfied with the COP's resolution of the complaint, he/she has the right to file a complaint with the:

Federal Transit Administration
Region 10
Office of Civil Rights
915 Second Ave, Suite 3142
Seattle, WA 98714
206-220-4462
Fax 206-220-7959

FTA Complaint procedures can also be found on the FTA web site at: www.fta.dot.gov. These procedures are also outlined in FTA Circular 4702.1A, Chapter IX.

APPENDIX A (Continued)
TITLE VI PUBLIC NOTICE OF RIGHTS / COMPLAINT PROCESS
CITY OF PULLMAN, WASHINGTON (COP)

Title VI

Complaint Form

Complaint Form

Instructions: If you would like to submit a Title VI complaint to the City of Pullman (COP), please fill out the form below and send it to: Title VI Coordinator, Attn: Human Resources Director, 325 SE Paradise St., Pullman, WA 99163. For questions or a full copy of COP's Title VI policy and complaint procedures call 509-338-3207 or email karen.sires@pullman-wa.gov.

1. Name (Complainant):														
2. Phone:	3. Home address (street no., city, state, zip):													
4. If applicable, name of person(s) who allegedly discriminated against you:														
5. Location and position of person(s) if known:	6. Date of incident:													
<div>7. Discrimination because of:</div> <table style="width: 100%;"><tr><td><input type="checkbox"/> Race/Color</td><td><input type="checkbox"/> Sex (includes sexual harassment)</td><td><input type="checkbox"/> Vietnam Era Veteran</td></tr><tr><td><input type="checkbox"/> National origin</td><td><input type="checkbox"/> Sexual orientation</td><td><input type="checkbox"/> Disabled Veteran</td></tr><tr><td><input type="checkbox"/> Creed / religion</td><td><input type="checkbox"/> Marital status</td><td><input type="checkbox"/> Retaliation</td></tr><tr><td><input type="checkbox"/> Disability</td><td><input type="checkbox"/> Age</td><td></td></tr></table>			<input type="checkbox"/> Race/Color	<input type="checkbox"/> Sex (includes sexual harassment)	<input type="checkbox"/> Vietnam Era Veteran	<input type="checkbox"/> National origin	<input type="checkbox"/> Sexual orientation	<input type="checkbox"/> Disabled Veteran	<input type="checkbox"/> Creed / religion	<input type="checkbox"/> Marital status	<input type="checkbox"/> Retaliation	<input type="checkbox"/> Disability	<input type="checkbox"/> Age	
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<input type="checkbox"/> Disability	<input type="checkbox"/> Age													

8. Explain as briefly and clearly as possible what happened and how you believe you were discriminated against. Indicate who was involved. Be sure to include how you feel other persons were treated differently than you. Also, attach any written material pertaining to your case.

9. Why do you believe these events occurred?

10. What other information do you think is relevant to the investigation?

11. How can this/these issue(s) be resolved to your satisfaction?

12. Please list below any person(s) we may contact for additional information to support or clarify your complaint (witnesses):

Name:

Address:

Phone number:

13. Have you filed this complaint with any other federal, state, or local agency; or with any federal or state court?

☐ Yes

☐ No

If yes, check all that apply:

☐ Federal agency

☐ Federal court

☐ State court

☐ Local agency

☐ State agency

If filed at an agency and/or court, please provide information about a contact person at the agency/court where the complaint was filed.

Agency/Court:

Contact's Name:

Address:

Phone number:

Signature (Complainant):

Date of filing:

APPENDIX B
Limited English Proficiency (LEP) Plan

Limited English Proficiency (LEP) Plan

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I INTRODUCTION

The purpose of this limited English proficiency policy guidance is to clarify the responsibilities of recipients of federal financial assistance from the U.S. Department of Transportation (DOT) and assist them in fulfilling their responsibilities to limited English proficient (LEP) persons, pursuant to Title VI of the Civil Rights Act of 1964 and implementing regulations. It was prepared in accordance with **Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq.**, and its implementing regulations provide 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, and;

II EXECUTIVE ORDER 13166

Executive Order 13166 "Improving Access to Services for Persons With Limited English Proficiency," reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency that is subject to the requirements of Title VI to publish guidance for its respective recipients clarifying that obligation. Executive Order 13166 further directs that all such guidance documents be consistent with the compliance standards and framework detailed in the Department of Justice's (DOJ's) Policy Guidance entitled "Enforcement of Title VI of the Civil Rights Act of 1964--National Origin Discrimination Against Persons With Limited English Proficiency." (See 65 FR 50123, August 16, 2000 DOJ's General LEP Guidance). Different treatment based upon a person's inability to speak, read, write, or understand English may be a type of national origin discrimination.

Executive Order 13166 applies to all federal agencies and all programs and operations of entities that receive funding from the federal government, including state agencies, local agencies such as the City of Pullman (COP), and governments, private and non-profit entities, and subrecipients.

III PLAN SUMMARY

The COP has developed this Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to COP transit services as required by Executive Order 13166. A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training staff, how to notify LEP persons that assistance is available, and information for future plan updates.

In developing the plan while determining the COP's extent of obligation to provide LEP services, the COP undertook a U.S. Department of Transportation four factor LEP analysis which considers the following: 1) The number or proportion of LEP persons eligible in the COP service area who maybe served or likely to encounter an COP program, activity, or service; 2) the frequency with which LEP individuals come in

contact with an COP services; 3) the nature and importance of the program, activity or service provided by the COP to the LEP population; and 4) the resources available to the COP and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

IV FOUR FACTOR ANALYSES

1. The number or proportion of LEP persons eligible in the COP service area who maybe served or likely to encounter a COP program, activity, or service. The COP examined the US Census report from 2000 and was able to determine that approximately 15.2%, or 3,605 people spoke a language other than English. Of the 3,605 people reporting they speak other languages than English, 1375 or 5.8% of respondents speak English less than "very well." (See APPENDIX B.1 COP Languages Spoken at Home Chart).

2. The frequency with which LEP individuals come in contact with a COP program, activity, or service

The COP assessed the frequency at which staff and drivers have or could possibly have contact with LEP persons. The COP seldom, if ever, receives a request for interpreters or request for translated COP documents. We may from time to time get an informational request where a staff person or a driver will utilize a third person to assist in understanding the request and conveying the requested information.

3. The nature and importance of the program, activity, or service provided by the COP to LEP community

There is no large geographic concentration of any one type of LEP individuals in the COP service area. The overwhelming majority of the population, 85% or 20,065, speak only English.

Therefore, there is a lack of any social, service, professional and leadership organizations within the COP service area that focuses on outreach or membership of LEP individuals.

4. The resources available to the COP and overall costs

The COP assessed its available resources that could be used for providing LEP assistance. This included identifying how much a professional interpreter and translation service would cost on as needed basis, which documents would be the most valuable to be translated if and when the populations supports, taking an inventory of available organizations that the COP could partner with for outreach and translation efforts, and what level of staff training is needed.

After analyzing the four factors, the COP developed the plan outlined in the following section for assisting persons of limited English proficiency.

V LIMITED ENGLISH PROFICIENCY PLAN OUTLINE

a) **How to Identify an LEP Person who Needs Language Assistance** - Below are tools to help identify persons who may need language assistance:

- Examine records requests for language assistance from past meetings and events to anticipate the possible need for assistance at upcoming meetings;
- When COP sponsored workshops or conferences are held, set up a sign-in sheet table, have a staff member greet and briefly speak to each attendee. To informally gauge the attendee's ability to speak and understand English, ask a question that requires a full sentence reply;
- Have the Census Bureau's "I Speak Cards" at the workshop or conference sign-in sheet table (contained herein as **APPENDIX B.2**). While staff may not be able to provide translation assistance at this meeting, the cards are an excellent tool to identify language needs for future meetings. Also, have the cards available at the COP Transit Office Area; and
- Frequently survey drivers and other first line staff of any direct or indirect contact with LEP individuals.

b) **Language Assistance Measures** - The COP has or will implement the following LEP procedures. The creation of these steps are based on the very low percentage of persons speaking other languages or not speaking English at least "well," and the lack of resources available in the COP service area:

- Census Bureau's "I Speak Cards" are to be located at their Customer Service locations at all times.
- The computer(s) located at the COP transit offices have AltaVista Babel Fish added to the favorites listing for easy access via Microsoft Internet Explorer for the translations of blocks of texts. This will aid the COP staff in the interpretation of services on a one-on-one basis for LEP individuals visiting the COP Transit Center.
- When the COP's website is redesigned, AltaVista Babel Fish translation will be an added feature.
- When an interpreter is needed, in person or on the telephone, and the COP staff has exhausted the above options, staff will first attempt to determine what language is required. Staff shall use the telephone interpreter service - Language Line Services at <http://www.language.com>. On the Language Line home page the staff will select the Need an Interpreter Now link and follow the directions to receive and access code.

c) **COP Staff Training** - All COP transit staff will be provided with the LEP Plan and will be educated on procedures to follow. This information will also be part of the

COP transit staff orientation process for new hires. Training topics are listed below:

- Understanding the Title VI policy and LEP responsibilities;
 - What language assistance services the COP offers;
 - Use of LEP "I Speak Cards";
 - How to access AltaVista Babel Fish via the transit computer(s);
 - How to use the Language Line interpretation and translation services;
 - Documentation of language assistance requests;
 - How to handle a Title VI and/or LEP complaint (this process is contained in APPENDIX A of the COP Title VI Plan)
- d) **Outreach Techniques** - As of this first draft of the COP LEP Plan dated July 2009, COP does not have a formal practice of outreach techniques due to the lack of LEP population and resources available in the service area. However, the following are a few options that the COP will incorporate when and/or if the need arises for LEP outreach:
- If staff knows that they will be presenting a topic that could be of potential importance to an LEP person or if staff will be hosting a meeting or a workshop in a geographic location with a known concentration of LEP persons, meeting notices, fliers, advertisements, and agendas will be printed in an alternative language, based on known LEP population in the area.
 - When running a general public meeting notice, staff will insert the clause, based on the LEP population and when relevant, that translates into "A (insert alternative Language) translator will be available". For example: "Un traductor del idioma español estará disponible" This means "A Spanish translator will be available".
 - Key print materials, including but limited to schedules and maps, will be translated and made available at the COP Transit Center, on board vehicles and in communities when a specific and concentrated LEP population is identified.
- e) **Monitoring and Updating the LEP Plan** - This plan is designed to be flexible and is one that can be easily updated. At a minimum, the COP will follow the Title VI Program update schedule for the LEP Plan. However, major updates most likely will not occur until the next Census in 2010 unless the COP finds it necessary and crucial for an update before such time.

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 COP service area?
 - Has there been a change in the types of languages where translation services are needed?
 - Is there still a need for continued language assistance for previously identified COP programs? Are there other programs that should be included?
 - Have the COP's available resources, such as technology, staff, and financial costs changed?
 - Has the COP fulfilled the goals of the LEP Plan? and
 - Were any complaints received?
- f) **Dissemination of the COP Limited English Proficiency Plan** - The COP includes the LEP Plan with its Title VI Policy and Complaint Procedures. The COP's Notice of Rights under Title VI to the public is posted in the COP transit office, on all COP transit vehicles, and in selected printed materials and also refers to the LEP Plan's availability.

Any person, including social service, non-profit, and law enforcement agencies and other community partners with internet access will be able to access the plan.

Copies of the LEP Plan will be provided, on request, to any person(s) requesting the document via phone, in person, by mail or email. LEP persons may obtain copies/translations of the plan upon request.

Any questions or comments regarding this plan should be directed to the COP Title VI Coordinator.

COP Title VI Coordinator
 Human Resources Director
 325 SE Paradise Street
 Pullman, WA 99163
 Phone: 509-338-3207
 Email: karen.sires@pullman-wa.com

APPENDIX B.1
COP Languages Spoken at Home Chart

COP Languages Spoken at Home Based on 2000 Census		
LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER	Total	Percent of population
Total resident population 5 years and over:	23,670	100.0%
Speak only English	20,065	84.8%
Language other than English	3,605	15.2%
Speak English less than "very well"	1,375	5.8%
Speak Spanish	1,016	4.3%
Speak English less than "very well"	293	1.2%
Speak Other Indo-European Languages	884	3.7%
Speak English less than "very well"	199	0.8%
Speak Asian and Pacific Island Languages	1,574	6.6%
Speak English less than "very well"	854	3.6%
Final Findings on COP "Non" or "Limited" Spanish/Other Speaking Persons: There is a very small population of potential COP riders or current riders who speak Spanish/Other Languages, and those that do, the majority speak English "very well".		

APPENDIX B.2

Census Bureau's "I Speak Cards"

<div style="display: flex; justify-content: space-between; align-items: center;"> <div style="text-align: center;"> United States Census 2000 </div> <div style="text-align: center; font-size: small;"> U.S. Department of Commerce Bureau of the Census </div> <div style="text-align: center;"> LANGUAGE IDENTIFICATION FLASHCARD </div> </div>	
<input type="checkbox"/> أملا هذا المربع إذا كنت تقرأ أو تتحدث العربية.	Arabic
<input type="checkbox"/> Եթե դու կարդես կամ խոսես հայերեն, նշանակիր այս քառակուսին:	Armenian
<input type="checkbox"/> যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন	Bengali
<input type="checkbox"/> ប្រសិនបើ អ្នក ចេះ អាន ឬ ទស្សនា ភាសា ខ្មែរ ។	Cambodian
<input type="checkbox"/> Maten i kahhen kormu un telai pat un sang i Chamorro.	Chamorro
<input type="checkbox"/> 如果您具有中文阅读和会话能力，请在本表格内标上乱数。	Chinese
<input type="checkbox"/> Make kazyo sa a si ou li oswa ou pale kreyòl ayisyen.	Creole
<input type="checkbox"/> Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik.	Croatian (Serbo Croatian)
<input type="checkbox"/> Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky.	Czech
<input type="checkbox"/> Kruis dit vakje aan als u Nederlands kunt lezen of spreken.	Dutch
<input type="checkbox"/> Mark this box if you read or speak English.	English
<input type="checkbox"/> اگر خواندن و نوشتن فارسی بدوستان، این مربع را علامت بگذارید.	Farsi

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