



**Title VI Plan**  
**FOR THE FEDERAL TRANSIT ADMINISTRATION**  
**AND WASHINGTON STATE DEPARTMENT OF TRANSPORTATION**

**Adopted October 25, 2017**

## TITLE VI COMPLAINT PROCEDURES

### INTRODUCTION

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. Specifically, Title VI provides 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. (42 U.S.C. Section 2000d)*

People For People 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.B.

### HOW TO FILE A TITLE VI COMPLAINT

If anyone believes they have been subjected to discrimination under Title VI, they may file a complaint. The complaint must be written, signed, and submitted within 180 days from the date the complainant became aware of the incident. The complaint should include the following information:

- Complainant's name, mailing address, and how to contact them (i.e., telephone number, email address, etc.).
- How, when, where and why the complainant believes they were discriminated against. Include the location, names and contact information of any witnesses.
- Other information that the complainant deems significant.

A complaint form (English or Spanish versions) is available at People For People's website: [www.pfp.org](http://www.pfp.org). The complaint may be filed with People For People using one of the following methods:

**U.S. Mail:** People For People, 304 West Lincoln, Yakima WA 98902,  
Attn: Human Resource Representative

**Email:** [hr@pfp.org](mailto:hr@pfp.org)

**Fax:** (509) 457-7897, Attn: Human Resource Representative

**TTY or Language Line:** (509) 453-1302, TTY 711

For more information, contact People For People's Human Resource Representative at (509) 248-6726.

*People For People 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 easily tracked. For complaints originally submitted by facsimile, an original signed copy of the complaint must be mailed to People For People’s Human Resource Representative as soon as possible, but no later than 180 days from the date the complainant became aware of the incident.*

**HOW PEOPLE FOR PEOPLE PROCESSES A TITLE VI COMPLAINT**

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

People For People will mail a letter to the complainant acknowledging receipt of the complaint within five business days.

In instances where additional information is needed for investigation of the complaint, People For People will request the complainant to provide this needed information. A complainant’s failure to provide the requested additional information may result in the administrative closure of the complaint.

Once sufficient information for investigating the complaint is received, People For People will take up to ten business days to prepare a written response letter.

**COMPLAINANT’S RIGHTS TO APPEAL A TITLE VI COMPLAINT RESPONSE**

People For People will send the complainant a final written response letter within ten business days. In this response letter, People For People will advise the complainant of their right to either appeal People For People’s response and/or file a complaint to an external agency as follows:

- The complainant has seven calendar days, from the date of receipt of the final written response letter from People For People, to submit an appeal of the decision with People For People.
- The complainant has the right to file a complaint with the funding agency such as the U.S. Department of Transportation and/or the Federal Transit Administration. People For People will provide the contact information for the funding agency in their final written response letter.
- The complainant has the right to file a complaint with the following additional offices:

Washington State Department of  
Transportation  
Public Transportation Division  
Attn: Title VI Coordinator  
P.O. Box 47387  
Olympia, WA 98504-7387

Federal Transit Administration  
Office of Civil Rights  
Attn: Title VI Program Coordinator  
East Building, 5<sup>th</sup> Floor – TCR  
1200 New Jersey Ave., SE  
Washington DC, 20590

United States Department of  
Justice  
Civil Rights Division  
Coordination & Review Sect.– NWB  
950 Pennsylvania Ave. NW  
Washington DC, 20530

## INVESTIGATIONS, COMPLAINTS, OR LAWSUITS

All Title VI complaints will be tracked using the following information:

	<i>Complaint</i>	<i>Investigation</i>	<i>Lawsuit</i>
<i>Type</i>			
<i>Date</i>			
<i>Summary</i>			
<i>Status</i>			
<i>Action Taken</i>			

All documents will be retained for six years past the close of service or past the usage of the vehicle that the complaint was received.

## LIMITED ENGLISH PROFICIENCY (LEP) PLAN

### PEOPLE FOR PEOPLE'S COMMITMENT

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

### CENSUS DATA ON LIMITED ENGLISH PROFICIENCY

The United States is home to millions of national origin minority individuals who are Limited English Proficiency (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.

The estimated number of persons who are 5 years and older and have difficulty speaking English in People For People's transportation service area and it's 2-1-1 service area (Region 7 Greater Columbia) are shown in the following table (U.S. Census Bureau, American Community Survey 5-Year Estimates, 2011-2015).

<b>County Residents With Limited English Proficiency</b>					
<i>County</i>	<i>Population During 5-Year Estimate Survey (5 + years)</i>	<i>Residents who Speak English less than “very well” (5 + years)</i>		<i>Residents who Speak English less than “very well” and speak Spanish (5 + years)</i>	
		<i>Number</i>	<i>% of Total</i>	<i>Number</i>	<i>% of Total</i>
<b>Public Transportation Service Area</b>					
Adams	16,992	4,599	27.1%	4,538	26.7%
Grant	84,033	15,285	18.2%	14,376	17.1%
Lincoln	9,857	41	0.4%	16	0.2%
Yakima	226,156	37,440	16.6%	36,161	16.0%
Total Public Transportation Area	337,038	57,365	17.0%	55,091	16.3%
<b>Remaining 2-1-1 Greater Columbia Service Area</b>					
Asotin	20,807	132	0.6%	69	0.3%
Benton	171,374	13,755	8.0%	11,088	6.5%
Chelan	69,163	6,885	10.0%	6,498	9.4%
Columbia	3,832	60	1.6%	60	1.6%
Douglas	36,767	4,799	13.1%	4,541	12.4%
Franklin	77,725	18,298	23.5%	17,273	22.2%
Garfield	2,083	16	0.8%	2	0.1%
Kittitas	40,104	1,298	3.2%	782	1.9%
Klickitat	19,645	669	3.4%	606	3.1%
Okanogan	38,584	3,962	10.3%	2,756	7.1%
Walla Walla	56,173	4,793	8.5%	4,196	7.5%
Whitman	44,720	2,021	4.5%	271	0.6%
Total 2-1-1 Greater Columbia Service Area	918,015	114,053	12.42%	103,233	11.25%

## **ANALYSIS OF FACTORS**

### **Factor No. 1: The number or proportion of LEP persons in the service area**

**Public Transportation Service:** People For People’s public transportation service is provided mainly in Adams, Grant, Lincoln, and Yakima counties. Additionally, People For People provides several transit routes that connect residents in these four counties to Benton, Chelan, Douglas, and Franklin counties. Of the total residents in Adams, Grant, Lincoln, and Yakima counties that are ages five and older, 83% speak English, 17% have difficulty speaking English, and 16% of the residents that have difficulty speaking English are Spanish speakers.

People For People mainly provides public transportation service for persons with special needs in rural areas: older adults, youth, persons with disabilities, and/or persons with limited incomes. Some of the transportation services are also available to the general public in the service area.

The rural areas of Adams, Grant, Lincoln, and Yakima counties are a thriving agricultural region of Washington State. Agricultural workers are needed to produce the region’s apples, grapes, potatoes, and other row crops. Many of these workers are Spanish speakers who originated from Mexico. This is the major reason why most of the persons who have limited English proficiency in this rural area are Spanish speakers.

**GC 2-1-1 Region 7 Greater Columbia:** People For People administers the Washington Information Network 2-1-1 for Region 7 Greater Columbia (GC 2-1-1). GC 2-1-1 includes the following 16 counties: Okanogan, Chelan, Douglas, Kittitas, Grant, Lincoln, Adams, Whitman, Yakima, Benton, Franklin, Walla Walla, Columbia, Garfield, Asotin, and Klickitat. Of the total residents in the GC 2-1-1 service area that are ages five and older, 88% speak English, 12% have difficulty speaking English, and 11% of the residents that have difficulty speaking English are Spanish speakers.

Information gathered from persons that have used the GC 2-1-1 service indicates between 9% and 10% have difficulty speaking English. In 2016, People For People handled a total of 34,962 GC 2-1-1 calls and approximately 3,229 were persons that have limited English proficiency.

<b>GC 2-1-1 Calls</b>			
<i>Year</i>	<i>Total Calls</i>	<i>LEP Calls (Spanish)</i>	<i>% of Total</i>
2015	36,233	3,606	10.0%
2016	34,962	3,229	9.2%

**Factor No. 2. The frequency that LEP individuals come into contact with the service**

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All contacts with People For People are made through its offices in Yakima and Moses Lake on a daily basis. These contacts are made through telephone calls directly to the offices (toll free), mail, website, email, and in person. People For People staff that answer the phone lines speak Spanish. Also, People For People has contracted with Language Line, a telephone interpreter service that provides access to over one-hundred languages, in the event translation services are needed for a different language. All written information on People For People’s services are translated in Spanish. The website has a translation button. Additionally, People For People’s Spanish speaking staff reach out to the community throughout the year at job fairs, senior expos, parent nights at local schools, community fairs, and other special events. People For People also provides regular outreach through the local Spanish radio station KDNA.

On average, People For People staff speak to persons who have limited English proficiency one to four times a day or an average of 40 calls per month.

### **Factor No. 3: The nature and importance of service provided by People For People**

People For People provides important public transportation services mainly to persons with special needs in rural areas: older adults, youth, persons with disabilities, and/or persons with limited incomes. Some of the transportation services are also available to the general public in these rural areas.

Rural areas tend to have very limited transportation options. They are generally isolated and individuals must travel many miles for health care, social services, nutrition, employment, education, shopping, and other places to meet their daily basic human needs. Rural residents who cannot transport themselves have very limited options for transportation.

People For People's public transportation is a vital link to rural residents so that they are able to remain independent and remain contributing members of their communities. Transportation access is important for all community members, including persons who have limited English proficiency. The importance of public transportation in People For People's service area is also reported in Yakima Valley's Human Services Transportation Plan and QUADCO's Human Services Transportation Plan.

### **Factor No. 4. The resources available to assure meaningful access by LEP persons**

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People For People is capable of communicating with persons having limited English proficiency in over one-hundred languages. People For People recognizes that Spanish is the major language used by LEP persons in our service area, and therefore has several in-house staff that are fluent in both English and Spanish. People For People also recognizes the need to have language services in other languages besides Spanish, and therefore contracts with Language Line, an interpreter service, to provide translation services for over 100 languages if needed.

People For People's bilingual staff, that are fluent in both English and Spanish, are asked to deal directly with persons that have limited English proficiency. When bilingual staff members are unavailable or unknowledgeable in the language that a person is proficient in, People For People utilizes Language Line.

### **IMPLEMENTATION PLAN**

People For People has implemented its plan to provide services to persons with Limited English Proficiency (LEP). An annual review will take place to make sure that the LEP population is receiving the communication needed to fully utilize People For People's services. The implementation plan is as follows:

1. People For People will track requests for translation services, maintain a data base that indicates the frequency of LEP contacts, the language used, and how the contacts were handled with the LEP persons.

2. People For People will identify LEP persons in the service area by reviewing the latest U.S. Census Bureau, American Community Survey 5-Year estimates for People For People's service area.
3. People For People will encourage bilingual persons that can speak and write in English and Spanish to apply for positions of employment with the agency.
4. People For People will publish information on services in both English and Spanish.
5. People For People will maintain the Google feature to translate information in the appropriate language on its website.
6. People For People will contract with an interpreter to provide access to telephonic interpreter services such as with Language Line.

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

In order to comply with 49 CFR 21.9(d), People For People 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. People For People has established a statement of rights and a policy statement to inform individuals of their Title VI rights and posts this statement on People For People's website, buses, and informational brochures. The statement of rights is as follows:

People For People is an equal opportunity employer and provider of employment and training and other services. People For People does not discriminate in providing services on the grounds of race, creed, color, religion, national origin, gender, age, marital status or the presence of any sensory, mental, or physical handicap. Auxiliary aids and services are available upon request to persons with disabilities. To obtain more information on People For People's non-discrimination obligations or to file a Title VI complaint, contact:

Human Resource Representative  
People For People  
304 West Lincoln  
Yakima, WA 98902  
(509) 248-6726  
TTY 711

## INCLUSIVE PUBLIC PARTICIPATION

Community Outreach is a requirement of Title VI. Recipients and sub-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 People For People. People For People has engaged the public in its planning and decision-making processes, as well as its marketing and outreach activities. Elements of People For People's public involvement process are described below:

### **Public Meetings**

People For People convenes public meetings to obtain input regarding service changes and planning future activities. These meetings are advertised in local newspapers, on Facebook, and in flyers posted in places frequented by riders. Flyers inviting persons to participate are provided in both English and Spanish. Meetings are held in several different locations within the service area, near bus stops, and at different time periods in order to give individuals various options to participate. The goal of holding several meetings at various times and places is to maximize participation of persons with viewpoints of minority and low-income populations.

### **Major Service Change or Fare Increase**

Prior to any major service changes or fare increases, People For People solicits public input on the proposed change by conducting a survey and holding public open houses or public meetings. All written information is provided in both English and Spanish and bilingual staff members are available for translation services during the public open houses or public meetings. Meetings are advertised in local newspapers, on Facebook, and in flyers posted in places frequented by riders. Meetings are held near bus stops, in several different locations of the service area, and during different time periods to encourage participation of individuals who represent viewpoints of minorities and low-income populations. After the surveys are completed and meetings are held, the final proposal is published in local newspapers at least 30 days prior to implementation.

### **Mobility Coordination**

People For People's 2-1-1 Mobility Management Transportation Specialist provides individuals with updated information on transportation options, eligibility requirements, and one-on-one assistance and problem solving to identify services and develop a travel plan. This Specialist is bilingual and provides assistance to any caller in the Greater Columbia 2-1-1 service area. Additionally, People For People has a bilingual Mobility Coordinator and Travel Trainer that assists clients in Adams, Grant, and Lincoln counties. Travel training typically involves learning how to read bus schedules and People For People's public transportation schedules are available in both English and Spanish. Travel training is available to all individuals in Adams, Grant, and Lincoln counties, no person is excluded from participating.

## **Customer Complaint Process**

Customer complaint forms are available in both English and Spanish at People For People's website: [www.pfp.org](http://www.pfp.org). Customers can also call in their complaint or use printed complaint forms that are available on all buses. People For People reviews and logs all complaints. Title VI and ADA complaints are addressed according to People For People's Title VI and ADA policies.

## **Bilingual Outreach**

People For People's bilingual staff reach out to the community throughout the year at job fairs, senior expos, parent nights at local schools, community fairs, and other special events. People For People also provides regular outreach through the local Spanish radio station KDNA. People For People make special efforts to reach out to persons protected under the Title VI Civil Rights Act.

## **Fixed Route Service Standards**

People For People has developed quantitative standards for fixed route operations to better understand and track the performance of our service to minority, low income and LEP populations. These standards apply to the fixed route portion of our services and are used to demonstrate that our fixed route services are provided to the general public regardless of race, color, or national origin.

People For People measures our fixed route system by using the following service standards

### **Vehicle Load**

The vehicles that serve People For People's fixed routes range in size from 14-passenger light duty cutaway buses to 28-passenger medium duty cutaway buses. The bus size used is dependent on the needed capacity of the fixed route. These fixed routes include:

- Yakima County Connector
- Lincoln County Community Connector
- Health Express Shuttle/Wenatchee-Quincy Express (between Grant, Douglas, and Chelan counties)
- Othello Connector (between Adams and Grant counties)

People For People's vehicle load performance standard is for each passenger boarding a People For People fixed route to have a secure place to sit.

### **Vehicle headways**

All of People For People fixed routes are provided in rural areas and have headways between 4 and 5 hours between vehicles traveling in the same direction on the route. Due to this long time period between vehicles, headways are not used as a quantitative standard for performance monitoring.

### **On-time performance**

The on-time performance is measured in real-time with tablets on each of the buses. This actual on-time performance is recorded in People For People's dispatch software RouteMatch to be used for analysis and reporting. People For People's performance standard is for all fixed route buses to not leave their fixed route stop prior to the time published in the route's schedule.

### **Service availability**

People For People determines where routes are needed in the service area through the Human Services Transportation Plan's gaps and needs analysis. This is a comprehensive analysis that takes special consideration of the needs of minority, low income, elderly, youth, veterans, and LEP populations. Service needs in People For People's service area of Adams, Grant, Lincoln, and Yakima counties are considered and evaluated. People For People will then develop grant applications for those needs and implement them if funds are awarded. People For People's performance standard is to evaluate the needs of individuals with special needs prior to implementing service expansions.

## **Fixed Route Policy Standards**

People For People has developed the following policy standards to describe how fixed route operations are provided to the general public regardless of race, color or national origin.

### **Vehicle Assignment**

People For People buses that are used for fixed route services are assigned based on the amount of capacity needed on that route. Currently, the Yakima County Community Connector and the Health Express Shuttle are served by buses having capacity greater than 14-passengers. The remaining fixed routes are served by 14-passenger buses. People For People's policy is to assign vehicles to fixed routes that provide for adequate capacity and operational condition -- not based on the race, color, or national origin of riders on that route.

### **Transit Amenities**

People For People's transit amenities are very limited and include bicycle racks on the buses used for fixed routes. People For People's policy is to place bicycle racks on vehicles serving fixed routes based on the bicycle usage in the region the fixed route is serving -- not based on the race, color, or national origin of riders on that route.