

Effective Date:
Nov 19, 2020

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POLICY 117: TITLE VI PLAN

Cancels:
See Also:

Approved by: Board of Directors

POL-311: TITLE VI PLAN

This policy applies to Twin Transit's compliance with Title VI of the Civil Rights Act of 1964 and as amended.

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, national origin, religion, sex, sexual orientation, marital status, age or disability in accordance with applicable law in programs and activities receiving federal financial assistance.

1. Twin Transit Committed to Ensuring No Person is Excluded

- a. Twin Transit ensures that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, national origin, religion, sex, sexual orientation, marital status, age or disability as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.B.
- b. Any person who believes they have been subjected to discrimination under Title VI may file a complaint.

2. Twin Transit Provides Complaint Procedure

- a. Customers may file a signed, written complaint up to one hundred and eighty (180) days from the date the complainant became aware of the incident.
- b. Customers may access online complaint forms at: www.twintransit.org.
- c. Customers may also file a complaint in writing to Twin Transit Administrative Offices, 212 E Locust Street, Centralia, WA 98531.

- i. Twin Transit encourages complainants to certify all mail that is sent through the U.S. Postal Service and/or ensure that all correspondence can be tracked easily.
 - d. Complaints include the following information:
 - i. Customer name, mailing address and preferred method of contact (i.e. telephone number, email address, etc.).
 - ii. Statement by customer of how, when, where and why they believe they were discriminated against.
 - 1. Include location, names and contact information of any witnesses.
 - iii. Other information customer deems significant.

3. Twin Transit Immediately Addresses Title VI Complaints

- a. Twin Transit's Senior Managers address all complaints alleging discrimination based on race, color or national origin within five (5) days of receipt of complaint.
- b. Twin Transit provides appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English.
- c. Twin Transit contacts the complainant using contact information provided in complaint when additional information is needed.
- d. Twin Transit's Chief Executive Officer (CEO), along with Senior Managers, review the complaint once sufficient information for investigation is received.
 - i. Review team conducts investigation by interviewing appropriate personnel and witnesses.
 - ii. Review team uses available technology, such as cameras or other recording devices, to assess incident.
- e. Chief Executive Officer, with support from Senior Managers, prepares investigation report detailing:

- i. Incident;
 - ii. Investigation process; and
 - iii. Results of investigation.
- f. Twin Transit notifies complainant of outcome within seven (7) days of completion of investigation.
 - i. Twin Transit uses the contact information provided by the complainant for notification purposes.
 - ii. Twin Transit advises the complainant of their right to:
 - 1. Appeal; or
 - 2. File complaint externally with the U.S. Department of Transportation and/or the Federal Transit Administration.
- g. Customers may file Title VI complaint by the process listed above or with the following offices:
 - i. Washington State Department of Transportation, Public Transportation Division, Attn: Title VI Coordinator, PO Box 47387, Olympia, WA 98504-7387
 - ii. Federal Transit Administration Office of Civil Rights, Attn: Title VI Program Coordinator, East Building, 5th Floor – TCR, 1200 New Jersey Ave SE, Washington, DC 20590
 - iii. United States Department of Justice, Civil Rights Division, Coordination and Review Section – NWB, 950 Pennsylvania Ave NW, Washington, DC 20530

4. Twin Transit Maintains Record of Complaints

- a. Twin Transit maintains a record of Title VI or other civil rights complaints, investigations and lawsuits (*see APP-117A: Record of Title VI and Civil Rights Complaints*).

5. Twin Transit Implements a Limited English Proficiency (LEP) Plan

- a. *See APP-117B: Limited English Proficiency Plan.*

- b. Twin Transit reviews the LEP Plan annually, including any contacts with LEP persons to determine the frequency of contacts, the language used and how the contacts were handled.

6. Twin Transit Provides Information Related to Title VI Obligations and Protections

- a. Twin Transit post statement of rights and policy statement online at www.twintransit.org, which complies with 49 CFR 21.9(d).

7. Twin Transit Implements a Public Participation Plan (PPP)

- a. Twin Transit seeks out and welcomes viewpoints of minority and low-income populations when conducting public outreach.
- b. Twin Transit uses its Public Participation Plan (*see APP-117C: Public Participation Plan*) to engage the public in its planning and decision-making processes.

8. Twin Transit Tracks Service Information

- a. Twin Transit uses quantitative standards for fixed route operations to better understand and track the performance of service to minority, low income and LEP populations.
 - i. Vehicle load [max capacity for each vehicle in fixed route]
 - ii. Vehicle headways [amount of time between vehicles traveling in the same direction on a route]
 - iii. On-time performance [Are runs on schedule? How is this measured?]
 - iv. Service availability [How are routes distributed in the service area?]
- b. Standards demonstrate that fixed route services are provided to the general public regardless of race, color or national origin.

9. Twin Transit Incorporates Fixed Route Policy Standards

- a. Twin Transit follows policy standards to ensure service is provided regardless of race, color or national origin.
 - i. Twin Transit assigns vehicle to areas based on ridership data showing which areas need larger vehicles.
 - ii. Twin Transit ensures equitable distribution of, and access to, transit amenities based on best practices established by ridership data and community feedback.