

Spokane Regional Health District Title VI (Non-Discrimination) Plan



1 INTRODUCTION

Spokane Regional Health District (SRHD) is a Federal Transit Administration (FTA) sub-recipient of Spokane Transit Authority (STA). STA contracts with SRHD to fund commuter incentives, employer programs, and other transportation demand management efforts. SRHD does not directly provide any transit services.

To meet Title VI program requirements, SRHD has its own procedures to meet certain requirements, such as a complaint process and public participation. SRHD will rely upon the analysis and overall program efforts conducted by STA to meet requirements.

Since SRHD does not operate any transit service, this plan only addresses the general reporting requirements.

2 GENERAL REPORTING REQUIREMENTS

2.1 Title VI Notice to the Public

SRHD notifies the public that it complies with the requirements of Title VI and related statutes and regulations. Notices are posted in the entranceway of SRHD and on the agency's website. The wording of the notice is as follows:

The Spokane Regional Health District (SRHD) hereby gives public notice that it is the policy of the agency to assure full compliance with Title VI of the Civil Right Act of 1964, as amended, the Civil Rights Restoration Act of 1987, Executive Order (E.O.) 12898, and related statutes and regulations in all programs and activities. Title VI requires that no person in the United States of America shall, on the ground of race color, sex or national origin be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the agency received federal financial assistance.

Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with SRHD. Any such complaint must be in writing and filed with the Administration Office of the Spokane Regional Health District within one hundred eighty (180) days following the date of the alleged discriminatory occurrence.

In accordance with Title VI of the Civil Rights Act of 1964, SRHD does not discriminate based on 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 SRHD Administration office at 509-324-1500 or 1101 West College Avenue, Suite 330, Spokane, WA 99201.

If information is needed in another language, contact 509-324-1500.

Si necesita información en otro idioma, comuníquese al 509-324-1500.

Для получения информации на другом языке звоните по тел. 509-324-1500.

Nếu quý vị cần thông tin bằng một ngôn ngữ khác, xin vui lòng gọi số 509-324-1500.

2.2 Title VI Complaint Process and Form

A Title VI complaint form and instructions for filling out a Title VI complaint can be obtained from the Administration Office of SRHD. See Appendix A.

2.3 Title VI Investigations, Complaints, and Lawsuits

SRHD has had no Title VI complaints, investigations, or lawsuits related to transit during the past three (3) years.

2.4 Public Participation Plan

SRHD fully encourages public involvement and participation in decision making processes. As part of the STA work plan for public transit projects, SRHD adopts the public participation plan of STA Title VI Program Report and will coordinate with STA in public participation efforts related to transit projects being managed by SRHD. See Appendix D

2.5 Language Assistance Plan

SRHD relies upon the limited English proficiency analysis conducted by STA that summarizes the outreach efforts made to engage minority and limited English proficiency groups. See Appendix E.

2.6 Non-Elected Committees and Councils

SRHD does not have any transit-related committees or councils. SRHD will conduct an analysis of the ethnic and racial breakdown of their non-elected committees, councils, and advisory boards; when complete, results of the analysis will include as an appendix of this plan.

2.7 Monitoring Sub-Recipients

SRHD has no sub-recipients. It will cooperate with STA in providing information and attending meetings as required by STA in its monitoring procedures of our efforts.

2.8 Review of Facilities Constructed

SRHD did not build any storage facilities, maintenance facilities, or operations centers and did not modify any facilities that require Title VI analysis.

2.9 Documentation of Governing Body Review and Approval of the Title VI Plan

On [date], the SRHD Board of Health (BOH) adopted this Title VI plan and signed the Title VI Non-Discrimination Certification. See Appendix B and C.

3 APPENDICES

3.1 Appendix A – SRHD Title VI Complaint Process and Form

3.2 Appendix B – SRHD BOH Resolution

3.3 Appendix C – SRHD Title VI Certification

3.4 Appendix D – STA Public Participation Plan

3.5 Appendix E – STA Language Assistance Plan



Title VI Complaint Process and Form

COMPLAINT OF DISCRIMINATION ON THE BASIS OF TITLE VI AGAINST THE SPOKANE REGIONAL HEALTH DISTRICT

Who can file a Title VI complaint?

Any individual, group of individuals, or entity that believes they have discriminated against based on race, color, sex, or national origin as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987.

Any individual having filed a complaint or participating in the investigation of a complaint shall not be subjected to any form of intimidation or retaliation. Individuals who have cause to think that they have been subjected to intimidation or retaliation can file a complaint of retaliation following the same process for filling a discrimination complaint.

How do I file a complaint?

A formal complaint must be filed within one hundred and eighty (180) calendar days of the alleged occurrence. To file a formal complaint, fill out and submit the completed form to the Administration Office of the Spokane Regional Health District (SRHD). SRHD will not officially act or respond to complaints made verbally.

What happens when I file a complaint?

Upon receiving the written complaint, SRHD will appoint coordinator to investigate and adjudicate the complaint. The coordinator will send a letter of acknowledgement within ten (10) days of receiving the complaint.

The coordinator will determine the complaint's jurisdiction, acceptability, need for additional information, and the investigative merit of the complaint. SRHD has forty-five (45) days to investigate the complaint. If more information is needed to resolve the case, the coordinator may contact the complainant.

After the coordinator reviews the complaint, they will issue one of two (2) letters of resolution; a closure letter or a letter of finding.

- A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.
- A letter of finding summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur.

What if I don't agree with the agency's letter of resolution?

A complainant who does not agree with the letter of resolution may submit a written request for a different resolution to the Administration Office of SRHD within thirty (30) days of the date of the letter. SRHD will analyze the facts of the case and will issue its conclusion to the appellant within 60 days of the receipt of the appeal.

Do I need an attorney to file or handle a complaint?

No, however, a complainant may wish to seek advice from private counsel regarding their rights under the law.

Submit completed complaint form to:

Spokane Regional Health District
Administration Office
1101 W. College Avenue, Suite 330
Spokane, WA 99201



Title VI Complaint Process and Form

Section I: Complainant Contact Information			
Last Name:		First:	M.I.:
Address:		City:	State: Zip Code:
Phone #:		Email Address:	
Section II: Other Party			
Are you filing this complaint on your own behalf? <input type="checkbox"/> Yes <input type="checkbox"/> No			
If yes, go to Section III. If no, please complete the following information:			
Name:		Relationship to the Complainant:	
Phone #:		Email Address:	
Please confirm that the Complainant knows you are filling this complaint. <input type="checkbox"/> Yes <input type="checkbox"/> No			
Section III: Allegation			
I believe the alleged discrimination I experienced was based on (check all that apply):			
<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> Sex	<input type="checkbox"/> National Origin
Date of Alleged Discrimination (month/day/year):			
As clearly as possible describe the alleged discrimination. Explain what happened and who you believe was responsible. Please attach extra pages if additional space is needed.			
Please provide the name, phone number, and mailing address for anyone who witnessed the alleged discrimination:			
Name:		Phone #:	
Address:		City:	State: Zip Code:
Name:		Phone #:	
Address:		City:	State: Zip Code:
Section IV:			
Have you filed this complaint with any other agency? <input type="checkbox"/> Yes <input type="checkbox"/> No			
Agency Name:		Contact Name:	Phone #

Note: You may attach any written materials or other information that you think is relevant to your complaint.

I hereby certify that the information provided is true and correct to the best of my knowledge.

Signature

Date

**BEFORE THE BOARD OF HEALTH
SPOKANE REGIONAL HEALTH DISTRICT**

RESOLUTION #17-04

RE: ADOPTING SRHD TITLE VI NON-DISCRIMINATION PLAN AND APPROVAL FOR BOARD CHAIR TO SIGN TITLE VI NON-DISCRIMINATION

WHEREAS, the Board of Health recognizes that as a sub-recipient of Federal Transit Administration funds, Spokane Regional Health District is required to comply with Civil Rights Act Title VI requirements.

NOW, THEREFORE, BE IT HEREBY RESOLVED BY THE BOARD OF HEALTH, that the attached Spokane Regional Health District Title VI Non-Discrimination Plan is adopted, and

BE IT FURTHER RESOLVED, that the Board gives approval for the Chair to sign the Title VI Non-Discrimination Certification.

BE IT FURTHER RESOLVED, that the provisions of the attached Spokane Regional Health District Title VI Non-Discrimination Plan shall be effective immediately upon adoption.

Signed this 27th day of April, 2017 in Spokane, Washington.

SPOKANE REGIONAL HEALTH DISTRICT
BOARD OF HEALTH


BREEAN BEGGS, COUNCILMEMBER

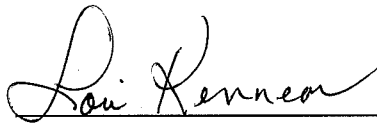

SUSAN BOYSEN, BOARD MEMBER


KEVIN FREEMAN, CHAIR

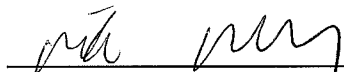
AL FRENCH, COMMISSIONER


CHUCK HAFNER, BOARD MEMBER


JOSH KERNS, COMMISSIONER

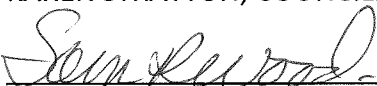

LORI KINNEAR, COUNCILMEMBER


BOB LUTZ, BOARD MEMBER


MIKE MUNCH, COUNCILMEMBER

SHELLY O'QUINN, COMMISSIONER


KAREN STRATTON, COUNCILMEMBER


SAM WOOD, COUNCILMEMBER

Title VI (Non-Discrimination) Certification

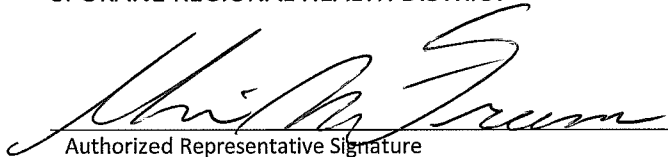


Spokane Regional Health District agrees that it must comply with applicable federal civil rights laws, regulations, requirements, and guidance, and follow applicable federal guidance, except as the Federal Government determines otherwise in writing. Therefore, unless a recipient or a federal program is specifically exempted from a civil rights statute, Federal Transit Administration (FTA) requires compliance with that civil rights statute, including compliance with the Non-Discrimination – Title VI of the Civil Rights Act.

Spokane Regional Health District will:

1. Prohibit discrimination based on race, color, or natural origin,
2. Comply with:
 - a. Title VI of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000d *et seq.*,
 - b. U.S. DOT regulations, "Nondiscrimination in Federally-Assisted Programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act of 1964," 49 C.F.R. part 21, and
 - c. Federal transit law, specifically 49 U.S.C. § 5332, and
 - d. Follow:
 - i. The most recent edition of FTA Circular 4702.1.B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients," to the extent consistent with applicable federal laws, regulations, requirements, and guidance,
 - ii. U.S. DOJ, "Guidelines for the enforcement of Title VI, Civil Rights Act of 1964," 28 C.F.R. § 50.3, and
 - iii. All other applicable federal guidance that may be issued.

SPOKANE REGIONAL HEALTH DISTRICT


Authorized Representative Signature

4/27/2017
Date

Kevin M. Freeman
Print Name

Chair SRHD Board
Print Title

Who by this signature certifies their authority to agree to comply with Title VI requirements on behalf of the Spokane Regional Health District.

SECTION 5 PUBLIC PARTICIPATION PLAN

Overview

To ensure public participation in Spokane Transit planning activities, the STA Board of Directors adopted a list of Communication Public Outreach goals, principles, and policies as part of the STA comprehensive plan, *Connect Spokane*, in September 2010. These policies are incorporated into the Title VI program. STA will apply these adopted measures when performing outreach efforts to minority, low-income, and limited English proficient (LEP) populations and will use the appropriate outreach tools depending on the scale of projects including major service and fare changes.

In addition to the public outreach techniques addressed in the comprehensive plan, STA works with Spokane Regional Transportation Council (SRTC) in conducting other outreach efforts aimed specifically at minority, low-income, and LEP populations, when conducting joint planning efforts pertaining to regional transportation.

Communications and Public Input Policies

The following Goals, Principles, and Policies were adopted by the STA Board of Directors as part of STA's Connect Spokane Comprehensive Plan.

Communications and Public Input

As a public agency, Spokane Transit Authority believes that proper communications and public input is of the highest importance. To ensure transparency, accountability, and fairness, STA must use a broad range of communication tools to reach as many people as possible. As technology improves, the amount of information available and the speed at which it can reach those interested increases daily, creating both opportunities and challenges. Fortunately, STA is able to use a variety of communications tools to both inform and gather information. The following list is not intended to be a complete list of communications tools which may be used but a sample of some strategies that STA may use for a variety of purposes. **(Connect Spokane page 65, along with the Table 2 below)**

Table 1 Public Outreach Tools

Outreach Tool	Definition
Public Hearing	A meeting during which public testimony may be heard and formal action may be taken on any measure before the STA Board of Directors
Legal Notice	Public posting or advertising in newspapers to announce a legal action or intent

Display Ads in Newspaper	Paid advertisement in the newspaper to alert readers about an upcoming event or action
Website/Online Social Media	Updates to the website and social media are quick and efficient ways of getting notice to the public quickly
Mobile Device Alerts	Messages alerting customers to important real-time information
Signs	Signs on buses, at stop locations, and at transit centers can help to reach people who use transit services
Rider Alerts	Notifications of route, frequency, or other information that is of particular interest to riders
Direct Mailings	Mail sent to an affected group or area to educate, notify, or request input
Workshops/Open Houses/Town Halls	Types of meetings where staff and public interact and discuss various issues
Surveys (scientific and self-selected)	Surveying opinions and ideas can help public agencies understand how to better serve the constituency
On-board Information	Pamphlets and posters that alert riders to information
Displays at Transit Centers	Permanent or temporary displays at transit centers are able to reach a large number of system riders
SEPA	The public outreach requirements of Washington State's State Environmental Protection Act (SEPA) are an effective tool for communicating with the public about proposed actions

Communications and Public Input Goal

STA will promote openness, honesty, and fairness through appropriate public outreach efforts.
(Connect Spokane page 66)

Communications and Public Input Principles

These principles (Connect Spokane) describe the foundation for the policies found in this element:

1. Continuous Communication

Open, honest, early, and continuous communication with all stakeholders increases public confidence in STA.

Changes in STA's operations impact many stakeholders, both within and outside the agency. For this reason, care should be taken to ensure all stakeholders are identified and remain well-informed.

2. Accountable

A public account of decisions made and responses to public input regarding these decisions increases STA's accountability to its customers.

Thorough recordkeeping helps to ensure a common understanding of decisions, policies, and responses. Sharing records with the public demonstrates the transparency with which STA conducts its business.

3. Accessible Information

Providing access and non-technical explanations of relevant reports, records, and documents demonstrates STA's commitment to transparency.

STA conducts its business in a fair, honest, and legal manner. For that reason, providing access to relevant documents broadens the public's perception of STA's high operating standards.

4. Two-way Communications

Consideration of the views of regulators, stakeholders, and the general public in making decisions demonstrates STA's commitment to fairness and equity.

Transit agencies exist to serve the community. To that end, community members have the right to share their views regarding transit service.

5. Timely

The provision of sufficient time for full public participation, including advance notice of activities and steps in the public process, demonstrates fairness and respect.

Scheduling events and the overall public process with an appreciation of today's busy lifestyles allows for the broadest public participation process possible.

6. Purposeful

Questions pertinent to issues under consideration should be answered by knowledgeable staff.

One can appreciate the frustration stemming from poorly-answered questions. Providing complete, accurate information increases the public's confidence in STA.

Communications and Public Input Policies

Note: These Public Input Policies will apply when planning outreach efforts to engage low-income, minority, and LEP populations, along with other affected or disadvantaged groups and the general public.

CI-1.0 – Public Outreach

The following policies are intended to serve as a guide describing public outreach/input requirements for each action. In cases where there are federal or state requirements for public outreach/input, STA will meet the minimum requirements. In cases where STA has requirements in addition to those defined by the state or federal government, STA will follow both.
(Connect Spokane, page 67)

1.1 Service Changes

In addition to following Federal Transit Administration guidelines for public outreach for service reductions, STA will also comply with the policy found in Table 3.

How to read the following table:

- 1) Determine cost and ridership impacts.
- 2) Consider exceptions.
- 3) The more severe cost or ridership impact determines the category (ex. Cost impacts fall into Category II but ridership impacts fall into Category I, follow the decision making and input/outreach process of Category II)

(Note: Category III in Table 2 Indicates a Major Service Change. The combined definition of Category III Cost Impacts and Ridership Impacts are where STA derives its Title VI Major Service Change Definition.)

Any fixed route adjustment or elimination which would change the paratransit boundary enough to eliminate service from at least one active customer* will trigger a Category II process.

*Active customer is someone who has used paratransit services within a year of the public hearing date.

(Connect Spokane, page 67)

Table 2 Public Input Categories

Public Input Categories				
		I-Minor	II-Moderate	III-Major
Determining Threshold	Cost Impacts	Less than 1.0% growth or reduction in revenue hours of service in any calendar year	1.0% up to 5.0% growth or reduction in revenue hours of service in any calendar year	More than 5.0% reduction in revenue hours of service in any calendar year
	OR Ridership Impacts	OR Less than .5% of annualized system ridership negatively impacted by loss of bus stop, trips or route at any given service change	OR .5% up to 5.0% of annualized system ridership negatively impacted by loss of bus stop, trips or route at any given service change	OR 5% or more of annualized system ridership negatively impacted by loss of bus stop(s), trip(s) or route(s) at any given service change
	Exceptions	Construction-related or emergency changes necessary for a period not exceeding 180 days for changes that would otherwise be moderate or major	Changes that would normally be classified as minor changes, but require a higher classification because of significant public interest or board involvement	None
	Input and Outreach	Employee and customer input, etc. Documented informal outreach for feedback on changes; may include survey or other tools	Outreach activities including driver and rider input, surveys, meetings with community groups, or other tools. Report to Board on activities.	Public Outreach Plan approved by Board in advance of outreach, which may include outreach to affected community groups, employers, etc.
Resulting Actions	Decision Making Process	CEO or designee; staff report detailing changes submitted to the Board at least 50 days prior to changes enacted (except for exceptions that are reported at least 30 days after)	Public hearing prior to Operations Committee and Board action.	At least one public hearing. Board action following Operations Committee recommendation with Title VI report.
	Examples	<ul style="list-style-type: none">• Running time adjustments• Departure time adjustments• Minor bus reroutes• Changes to bus stop locations (Per CI 1.4)	<ul style="list-style-type: none">• Significant route changes• Addition or deletion of service to a large area	<ul style="list-style-type: none">• A large service reduction• A restructure of the network
Public Input Categories				

1.2 Fare Increases

Fare increases of more than 10% in any three-year period shall be considered through the public outreach process as a Category III-Major Change as defined in Policy 1.1. For cumulative changes, the Category III-Major Change public process will only be applied to the increase which breaks the 10% threshold, not the previous increases.

(Connect Spokane, page 69)

1.3 Grants

Table 3 Public Process for Grants

Grant Condition	Public Process
Grants in Capital Improvement Program (CIP)	Adoption of CIP will serve as the public process
Grants applications less than \$1 million*	Notice on STA's website
Grants applications at least \$1 million*	Adoption by Board of Directors

*If grant application project is not contained in the Capital Improvement Program

1.4 Stop Changes

If the cumulative stop changes that take place within a calendar year affect the boardings of 10% of a route's annual ridership, STA will use the tools described in the beginning of this element to gather public input before a final decision is made.

A stop serves as the point at which a rider can access the transit service. The placement of this access is important for the rider, driver, and riders already on board. STA is continually evaluating stop locations along all transit routes by considering safety, stop spacing, and proximity to destinations. (Connect Spokane, page 69)

1.5 Transit Development Plan

STA will hold at least one public hearing while developing its program for each annual update.

As a public transportation benefit area authority in Washington State, STA is required to prepare a six-year transit development plan and annual report. This document provides updated information to the Washington State Department of Transportation on the various activities of STA.

(Connect Spokane, page 69)

1.6 Comprehensive Plan

STA will undertake public outreach efforts for subsequent updates to the Comprehensive Plan and allow an opportunity for public testimony prior to any substantive amendments.

Any change which affects the substance of the Comprehensive Plan will require a public hearing and supporting public outreach. (Connect Spokane, page 69)

1.7 Disadvantaged Business Enterprise (DBE)

The DBE goals will be available on STA's website for no less than 15 days prior to adoption by the Board. (Connect Spokane, page 69)

1.8 Title VI Reporting

During major service reductions and fare increases, STA will conduct an analysis to verify that no discrimination of protected classes takes place.

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."

(Connect Spokane, page 70)

1.9 Major Capital Projects

During the annual Capital Improvement Program (See System Infrastructure Policy 4.0) update process, which identifies all major capital projects, appropriate public outreach and a public hearing shall take place prior to adoption. Amendments to the Capital Improvement Program will follow a similar process.

Any capital project requiring board approval and outside of the normal budgeting process shall be subject to a public hearing to receive public input and testimony.

(Connect Spokane, page 70)

1.10 HPT Corridor Planning

During any Alternatives Analysis for a High Performance Transit corridor, STA or its consultant will develop a public outreach plan to both gather input and provide information about the project being evaluated. (Connect Spokane, page 70)

1.11 Budget

STA shall hold at least one public hearing prior to the adoption of the annual budget.

Each year the Board of Directors adopts an annual budget that outlines how the agency intends to spend tax, fare, grant and advertising monies. (Connect Spokane, page 70)

1.12 NEPA/SEPA/Environmental outreach

Where appropriate or required, STA shall incorporate public outreach and SEPA and NEPA evaluations, with the intent to exceed minimum requirements. (Connect Spokane, page 70)

CI-2.0 – Service Communication

2.1 Branding

All branding shall be part of a coordinated system-wide branding plan developed to better the customer experience.

Effective branding can help the customer by conveying simple messages about frequency, span, destinations, and connectivity. By creating a larger branding plan, STA will be consistent with branding styles and purposes. (Connect Spokane, page 70)

2.2 Technology

Use improving technology to increase the amount of ridership information available to customers.

By using new and existing technologies, STA can increase ridership by creating a more pleasant experience for transit riders. Technology can decrease wait time, improve decisions about mode choice, increase safety, etc. (Connect Spokane, page 70)

2.3 Public Education

Invest resources in educating existing and potential customers about travel options.

STA offers a variety of transportation services (i.e. fixed route, paratransit, rideshare) that assist in providing solutions to many different customer needs. By investing in education, STA can help customers ensure that they are best using the transportation services which STA provides.

(Connect Spokane, page 71)

Public Outreach Techniques for Title VI Populations

These outreach strategies are based on techniques from the Spokane Regional Transportation Council (SRTC) Public Participation Plan. STA partners with SRTC when conducting joint-planning studies on regional transportation planning efforts, such as the Spokane County Coordinated Public Transit/Human Services Transportation Plan. The public participation strategies listed below are used by SRTC as part of the public outreach process for these plans and studies. The techniques listed below pertain to Title VI populations (minority, LEP, low-income).

SRTC Public Participation Techniques

Techniques to Involve Low Income Communities and Minority Communities

- Focus Groups
- Include information with meeting notices on how to request translation assistance
- Extensive use of visualization techniques including maps and graphics
- Consultation with the Washington Adult Literacy Council, which maintains data on low literacy and limited English Proficient Populations
- Consultation with Spokane Housing Authority on locations of low-income housing populations.
- Conduct an ongoing dialogue with groups representing potentially underserved populations, such as the elderly, youth, and non-native English speakers
- Notify agencies that work with minorities and low income populations of agency activities
- When multiple meetings are held for a single subject, efforts are made to use a diversity of meeting locations in an effort to reach all segments of affected populations
- Opportunities are sought out to speak at meetings of groups involving minority/low income and traditionally underserved populations
- Press releases are distributed to local media outlets to inform the public of meetings, open houses, and other SRTC activities

- All SRTC press releases and other notices include working to the effect that SRTC assures non-discrimination in accordance with Title VI of the Civil Rights Act of 1964 and that special accommodations can be arranged in advanced

Techniques to Involve Limited English Proficient Populations

- Translate outreach materials and have translators available at meetings as requested
- Include information on website and meeting notices on how to request translation or other assistance.
- Use visualization techniques such as maps and graphics to illustrate trends, proposed projects, etc.

2017 Title VI Update STA Public Outreach Strategies

This Outreach Plan details the strategies that will be employed to engage the public and stakeholders throughout the update of Spokane Transit's Title VI Program.

Goals of the Outreach Strategies

- Promote Inclusive public participation
- Engage stakeholders and members
- Provide transparency
- Educate stakeholders and decision makers about STA's responsibilities under Title VI

Overall Strategies

Website

Notice will be provided on STA's Title VI webpage that the update is underway and that input on the update is welcomed and encouraged. Drafts of the program will be posted for review.

Email Notice

STA will send email notice of the update to agencies and organizations that serve and advocate for minority and low income persons.

Community Center Outreach

Engage neighborhood community centers that serve minority and low-income populations.

Committee Engagement and Review

The STA Board Planning and Development Committee will be engaged periodically throughout the process.

Public Hearing

After the Planning and Development Committee makes a recommendation, the Board of Directors will hold a public hearing before taking action on the updates. The hearing notice will be published in the Spokesman Review and on STA's website.

Limited English Proficiency (LEP) Plan Strategies

Online Survey

STA will engage LEP serving agencies with an email invite to participate in a Survey Monkey survey regarding how their clients engage with STA.

Follow-up Interviews

After the Survey Monkey responses are submitted, STA will follow-up with respondents and schedule a meeting to further discuss the needs of their clients in regards to STA's service.

Table 4 2017 Title VI Public Outreach Efforts

Date	Item
August 11, 2016	Survey and Introductory e-mail Sent to LEP Agency Staff
October 10-19, 2016	Follow-up interviews with LEP Agency Staff
November 2, 2016	Updated the STA Board of Directors Planning & Development Committee
December 2, 2016	Notice of Title VI Program Update posted on STA website
December 12, 2016	Title VI survey sent to agencies that serve minority and low income people
December 15, 2016	STA Board of Directors adopts Outreach Strategies for the program update
January 22, 2017	Published public notice for Title VI hearing to be held on February 16, 2017
January 23, 2017	Draft Title VI Program available on STA website for public comment
February 1, 2017	Draft Title VI Program sent to FTA for comment
February 1, 2017	Present Draft Title Program with Planning and Development Committee
February 16, 2017	Public Hearing on the 2017 Title VI Program at the STA Board Meeting
March 1, 2017	Review public comments and changes with Planning and Development Committee
March 16, 2017	STA Board adopts 2017 Title VI Program
March 23, 2017	2017 Final Title VI Plan sent to FTA

2017 Limited English Proficiency (LEP) Analysis and Language Assistance Plan

Draft

January 23, 2017

Attachment A



Upon request, alternative formats of this document will be produced for people with disabilities. Please call 325-6094 or TTY WA Relay 711 or email smillbank@spokanetransit.com

Table of Contents

Introduction	3
The Four Factor Analysis	4
Four Factor Summary.....	4
Factor 1 The number and proportion of LEP persons served or encountered in the eligible population.	4
Factor 2 The frequency with which LEP individuals come in contact with a Spokane Transit Authority program, activity, or service	6
Factor 3 The nature and importance of the program, activity, or service provided by Spokane Transit Authority to the LEP Community	7
Factor 4 The resources available to Spokane Transit Authority and overall costs	8
Plan for Assisting Persons of Limited English Proficiency	10
Appendix	13
Attachment 1 Demographic Data	14
Attachment 2 LEP Organization Contacts	19
Attachment 3 Survey Introductory Email	20
Attachment 4 LEP Survey	21
Attachment 5 LEP Survey Results	24
Attachment 6 Survey and In-Person Meeting Analysis.....	26
Attachment 7 River Linguistics Reference Sheet	31
Maps	32
Table 1 Locations of High LEP Residential Settlement with Language Spoken	6
Table 2 Means of Transportation to Work and Ability to Speak English	6
Table 3 Potential Steps for Assisting LEP Transit Use and Relative Cost & Impact of Implementation	10
Table 4 Language Spoken at Home	14
Table 5 Language Spoken at Home by Ability to Speak English	15
Table 6 Spokane Transit Authority Public Transportation Benefit Area (PTBA) LEP Population by Census Tract	16
Table 7 2016 Survey Respondents	19
Table 8 2016 In-Person Meeting Participants	19
Table 9 2016 Survey Results with the Number of Organizations giving each Response	26
2	
Plan	
2017 Title VI Plan	
Attachment A—LEP	

Table 10 Barriers to Transit, and Number of Organizations Citing each Barrier	27
Table 11 Suggestions from In-Person Meetings for Assisting LEP Transit Use, and Relative Costs & Impacts of Implementation	28
Figure 1 Relative distribution of languages in the Spokane Transit service area	27
Map 1 LEP Population by Census Tract	33
Map 2 STA System Map	34

Introduction

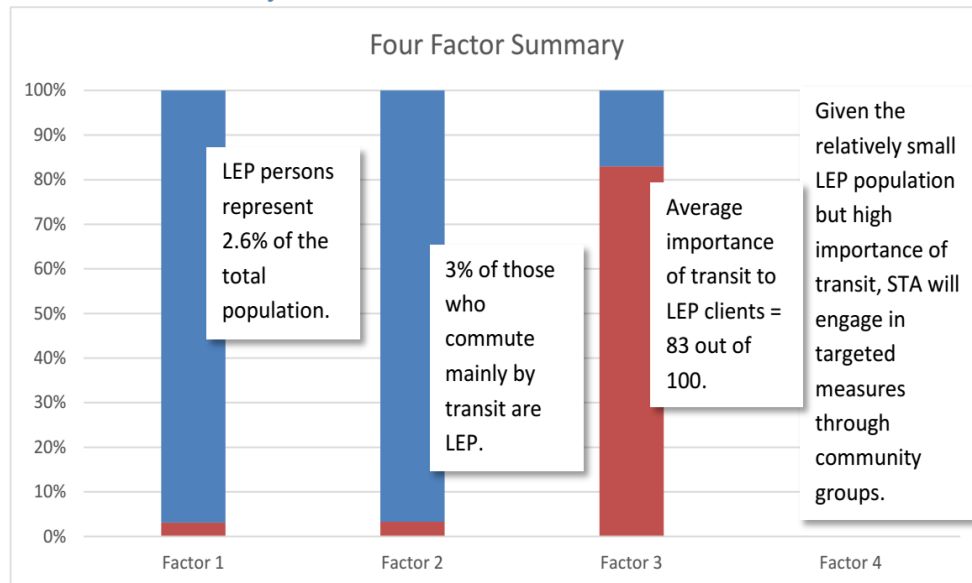
Spokane Transit Authority (STA) has conducted a Four Factor Analysis to meet the requirements under Title VI of the Civil Rights Act of 1964. The Four Factor Analysis provides a framework to conduct a needs assessment of people with Limited English Proficiency (LEP). Based on the needs assessment, a language assistance plan was developed that was consistent with the provisions of Section VII of the LEP guidance.

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., and its implementing regulations provide that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance. The Supreme Court, in *Lau v. Nichols*, 414 U.S. 563 (1974), interpreted Title VI regulations prohibits conduct that has a disproportionate effect on persons with Limited English Proficiency (LEP) because such conduct constitutes national origin discrimination.

According to the Federal Transit Administration Office of Civil Rights handbook dated April 13, 2007, *Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers*, "Individuals, who have a limited ability to read, write, speak, or understand English are limited English proficient or 'LEP.'"

The Four Factor Analysis

Four Factor Summary



Factor 1 The number and proportion of LEP persons served or encountered in the eligible population.

The purpose of Factor 1 is to determine the number and proportion of LEP persons served or encountered within the service area. In order to better understand the LEP population eligible to be served, Spokane Transit has identified the geographical service area boundary, reviewed U.S. Census data, and reached out to community organizations.

Service Coverage & LEP Utilization

The Spokane Transit Public Transportation Benefit Area (PTBA) includes the cities of Spokane, Airway Heights, Cheney, Liberty Lake, Medical Lake, Millwood, and Spokane Valley, as well as limited unincorporated areas of Spokane County. LEP persons may use transit to reach destinations throughout the PTBA – employment, the community colleges, health clinics, and housing.

Data and Information Gathering:

- Collected U. S. Census and American Community Survey Data on LEP populations by language, transportation mode, and census tract (Attachment 1, Tables 1, 2, 3, and Map 1).
- Identified and verified 26 community organizations that work closely with LEP populations. The list (Attachment 2) combined prior contacts with referrals from other organizations, and was verified through individual phone calls.

4
Plan

2017 Title VI Plan

Attachment A—LEP

- Distributed an introductory email (Attachment 3) and administered an online survey through SurveyMonkey (Attachment 4) to the list of organization contacts.
- Interviewed contacts in person.
- Described the Spokane Transit service area and concentrations of LEP populations (Maps 1 and 2) in the service area.

Based on the review of the information collected above (census data, online surveys responses and in-person interviews) the following characteristics of the LEP population in Spokane County are described below.

Census Overview

Individuals demonstrating a limited ability to read, write, speak, or understand English are considered to have limited English proficiency. According to the 2015 American Community Survey (ACS), 13,897 of Spokane County's 451,005 residents reported speaking English "less than very well", or 2.6% of the total population (Attachment 1, Table 1). The percentage of LEP persons is slightly higher within the Spokane Transit PTBA at 3.23% (13,348 out of 413,843 – Attachment 1, Table 3).

Input from Community Organizations

- Based on survey responses, the most common languages encountered by community organizations are Spanish, Russian, and Arabic, followed by Marshallese, Burmese (including Chin and Karen), Vietnamese, Swahili, Ukrainian, Nepali, Chinese, Farsi, Somali, Kinyarwanda, Korean, Moldovan, Thai, French, Bosnian, and Kirundi. Other languages encountered by more than one organization included Amharic, Chuukese, Dari, Hindi, Japanese, Portuguese, Punjabi, Tagalog, and Tigrinya.
- Community organizations, on average, rated 74% of their LEP clients as literate in their native language (see Attachment 5).
- According to Spokane International Translation, the largest influx of LEP persons has been from Arabic-speaking countries in the last year, an influx which may not be reflected in the 2015 ACS estimates.
- In-person interviews with community organizations revealed that the current highest areas of LEP residential settlement include Division Street at Newport Highway, Nevada Street at Lincoln Road, and the Hillyard Neighborhood. These areas meet the two main requirements for refugee resettlement: adequate affordable housing and proximity to a transit line. Prior areas of settlement with significant LEP communities include the Lower South Hill at Freya Street, Spokane Valley, and Browne's Addition. Table 1 below lists the neighborhoods and any particular LEP language concentrations.

Table 1 Locations of High LEP Residential Settlement with Language Spoken

LOCATION	LANGUAGES
DIVISION AT NEWPORT HWY	Arabic, Swahili, French (Congolese), Russian
NEVADA AT LINCOLN RD	Russian
HILLYARD	Russian, Marshallese
LOWER SOUTH HILL	Burmese
SPOKANE VALLEY	Marshallese

Factor 2 The frequency with which LEP individuals come in contact with a Spokane Transit Authority program, activity, or service

In 2015, Spokane Transit fixed route service provided 10,815,736 passenger trips, Paratransit provided 464,449 passenger trips, and Vanpool provided 219,578 passenger trips,

Census Overview

The 2015 ACS 1-year estimates include data on main mode of commute to work among LEP and non-LEP populations. While the LEP proportion of the overall working population age 16 years and older is only 2.54%, the proportion of public transportation commuters who are LEP is slightly higher, at 3.13%. Conversely, the proportion of LEP workers who are using primarily public transportation is 172 out of 5,336, or 3.22%. Table 2 below shows percentages of LEP riders for each commute type.

Table 2 Means of Transportation to Work and Ability to Speak English

Subject	Spokane County, Washington	Speaks English less than “very well”	
	Estimate	# Persons	% of Total
Workers 16 years and over	209,689	5,336	2.54%
Car, truck, or van - drove alone	164,411	2,768	1.68%
Car, truck, or van - carpooled	18,466	1,664	9.01%
Public transportation (excluding taxicab)	5,489	172	3.13%
Walked	5,966	166	2.78%
Taxicab, motorcycle, bicycle, or other means	3,948	143	3.62%
Worked at home	11,409	423	3.71%

Source: U.S. Census Bureau, 2015 American Community Survey 1-Year Estimates. Table B08113: Means of Transportation to Work by Language Spoken at Home and Ability to Speak English.

Input from Community Organizations

Spokane Transit conducted interviews and requested input from community groups serving LEP persons through an online survey (Attachment 4). Of 26 total surveys sent, 17 contacts from 15 separate organizations returned a completed survey. When asked the importance of transit to their LEP clients on a scale of 0-100, survey respondents gave an average importance of 83. A summary of the returned surveys is provided (Attachment 6).

Input from STA Staff

- There were 28 requests for translation received during the 2014-2016 assessment period.
- According to the STA Driver Training staff, routes with the highest LEP ridership are Routes 94 and 20/33. Route 94 may serve as many as six riders speaking an Asian language two times per day, and Route 20/33 may serve over one hundred Japanese students in a day. It should be noted that one of the main reasons that the Japanese students attend Mukagawa Fort Wright Institute is to expand their English speaking abilities. In most communications with LEP persons on the bus, the passenger usually brings a map, either printed or on a smartphone, showing their destination.
- STA Security interacts with about five non-English speaking patrons a week, usually students from the Spokane College of English Language, which is across the street from the STA downtown transit center. The majority of questions are in regards to locating the correct boarding zone. A multilingual contract officer on staff is brought into conversations as needed for assistance.

Review

- Per ACS 2015 data, 3.1% of Spokane Transit regular commuters are LEP persons. Likewise, 3.2% of the LEP working population uses transit as their main mode of commute (Table 2).
- Community organizations ranked the importance of transit to their LEP clients at 83 out of 100.
- STA has received one request for written translation and infrequent requests for in-person verbal assistance.

Factor 3 The nature and importance of the program, activity, or service provided by Spokane Transit Authority to the LEP Community

Description of Services

As a regional public transportation agency, Spokane Transit Authority provides vital connections between residents and employers, educational institutions, medical centers, shopping malls, intermodal transportation centers such as the Spokane International Airport, and Fairchild Air Force Base. Serving downtown Spokane, Spokane Valley, and five other cities within the PTBA, Spokane Transit operates within an area encompassing approximately 248 square miles and 417,116 residents, or 85.0% of the county population (based on Washington State Office of Financial Management 2016 PTBA population estimates and US Census Bureau July 2015 county population estimates).

In addition to fixed route services, STA provides ADA Paratransit and Vanpool services. Paratransit is door-to-door service provided within a defined service area, during fixed route operating hours, to eligible individuals who are disabled and whose disability prevents them from using fixed route

bus service. Vanpool (Rideshare) service augments STA's public transportation system through the assignment of passenger vans to vanpool groups.

Input from Community Organizations

Spokane Transit conducted an online survey of and in-person interviews with community groups serving LEP persons (Attachments 4 and 5). Below is a compilation of survey responses and interview discussions as relating to importance of service to the LEP population.

- When asked to rate the importance of transit to their LEP clients on a scale of 0 ("not important") to 100 ("very important"), the 16 respondents to the question rated the importance of transit between 25 and 100, with an average of 83. Nine of the 16 respondents ranked the importance of transit at 98 or above.
- When asked how often LEP clients express difficulty using or accessing transit service on a scale of 0 ("never") to 100 ("very often"), the 14 respondents to this question gave answers from 0 to 90. There is no way to determine if the difficulty is related to their ability to speak English or other difficulties related to accessing transit.
- Local resettlement organizations are required to house newly-arrived refugees within a few blocks of a transit stop. Likewise, the Community Colleges of Spokane International Student Program places incoming students within a short distance of transit, with the intent to provide a commute to school of 40 minutes or less.
- According to the Spokane Community College ESL Program for adult learners, which offers career placement services, LEP persons often turn down jobs at locations without adequate transit access. LEP individuals are more likely to work in downtown Spokane where there is frequent and ubiquitous transit service.

Review

- Survey respondents reported that transit is of high importance to LEP populations and LEP persons fairly frequently express difficulty in using or accessing transit services. It is not clear of how much of this difficulty is attributable to a language barrier.
- The availability and accessibility of transit service influences where some LEP individuals live and work.

Factor 4 The resources available to Spokane Transit Authority and overall costs

Resources & Costs

- A number of local organizations serve LEP populations in a variety of ways including: translation, ESL education, networking, job training, housing and other basic services.
- The cost for telephonic translations is \$1.19 per minute for all languages plus a \$.35 cent fee for agent assisted connections through River Linguistics Inc.

- Written translations costs vary by language. For example the going rate through River Linguistics Inc. for Spanish (Latin America) translation is \$0.15/word, Russian is \$0.16/word, and Vietnamese is \$0.20/word.
- The list below outlines a number of resources offered within STA and among community organization for assisting LEP persons to ride the bus or otherwise overcome language barriers to reaching their destinations. Information on these resources was gained through interviews with LEP organizations and STA staff.

Resources currently available for assisting LEP persons in meeting transportation needs

- Spokane Transit website is translatable with Google Translate.
- Community Colleges of Spokane (CCS) International Students Program and Country Homes ESL School both help LEP persons to find transit commute options on an individual basis. CCS requires host families to be located within a short distance of transit and to ride the bus with students at least once to and from school.
- Spokane Community College Adult Education Program publishes a map showing their campus locations and the downtown Plaza.
- Refugee Connections posts community events on Facebook giving directions to the events.
- Community Colleges of Spokane International Students Program conducts a safety orientation for incoming students who will be riding the bus.
- One contract officer with STA Security is fluent in Arabic and one Human Resource employee is fluent in Spanish.
- STA's Mobility Training program can use telephonic interpreters when teaching an LEP person to ride the bus.
- STA contracts with River Linguistics to provide telephone interpretation. Spokane International Translation also provides interpretation services.

Following an analysis of various potential steps STA can take to further facilitate LEP ridership, the following potential actions are recommended for implementation. These are selected from ideas derived during LEP organization and STA staff interviews. The full list of potential actions from which this list is compiled is available in Attachment 6, Table 3.

Table 3 Potential Steps for Assisting LEP Transit Use and Relative Cost & Impact of Implementation

RESOURCE	COST	IMPACT	NON-COST BARRIERS (CULTURAL, LOGISTICS, TECHNOLOGY, ETC.)	STATUS
Make the Google Translate feature on the website more accessible	TBD	High	Medium	On 2017 web development list
Send link to current STA "How to Ride the Bus" video to LEP organization contacts	Low	High	Low	Complete
Attend student orientations at the colleges during the first week of classes. Bring info cards with key STA web links.	Med	High	Low	As requested.
Print large format maps of the stops on each route to be placed in overhead advertising spaces on new HPT buses (similar to route maps in US and European subways)	Med	High	Med	Will be considered in the implementation of new HPT lines.
Continue to build LEP topics into the vehicle operator and security personnel training curriculum	Med	High	Low	Ongoing
Provide an updated photo of security uniforms and rendering of the new security station at the Plaza to the Community Colleges of Spokane for their International Students Program safety orientation	Low	Med	Low	Complete
KEY				
COST		IMPACT		
Low Cost = \$10-50 to implement		Low Impact = 10-20 persons reached/year		
Med Cost = \$50-2000 to implement		Med Impact = 20-1000 persons reached/year		
Med-High Cost = \$2000-10,000 to implement		High Impact = 1000+ persons reached/year		
High Cost = \$10,000+ to implement				

Review

Balancing the relatively low LEP population in the service area with the high importance of transit to LEP persons, STA plans to implement select steps from above in conjunction with the local community organizations and resources. These steps are anticipated to have the highest impact relative to their cost.

Plan for Assisting Persons of Limited English Proficiency

In person and over the phone STA uses telephonic translation services currently provided through River Linguistics Inc.

Below is the procedure used by STA customer-facing employees to assist LEP persons using a telephonic translation service. For more detailed information, please refer to Attachment 7 for the River Linguistics Reference Sheet.

1. First attempt to identify the language. If the customer tells you the language or you can identify use the phrase: 'One Moment please'
2. Dial 1 855 800-5789
3. When greeted by a call center coordinator, please reply:
 - a. Your full name
 - b. Request the language needed, or ask for assistance in identifying the language.
 - c. Hold momentarily while your Interpreter is connected.
 - d. The coordinator will inform you that the interpreter is on the line and will provide you with the Interpreters ID number.
 - e. Explain the objective of the call to the Interpreter, then proceed by speaking directly to the Limited English Proficient speaker in the first person.
 - f. Upon completion of the call, all parties should simply hang up. Your time will be automatically recorded.

When approached by an LEP individual an STA customer-facing employee will ascertain the language the individual requires using the "Point to the Language Sheet" provided by River Linguistics Inc., or call the service and get help identifying the language.

Language Assistance Measures

The availability of language assistance will be posted at the Plaza and the STA website. Notice of translation service will be provided in Spanish, Russian, and Vietnamese, the three identified "Safe Harbor" languages.

Spokane Transit Staff Training

The LEP Plan is available for all customer-facing employees in hard copy. This information also will be part of the Spokane Transit staff orientation process for new customer-facing hires. Training topics include:

- STA's Title VI LEP policy and procedures;
- Language assistance offered by STA; and
- Procedures for accessing an interpreter.

Safe Harbor Provision

According to the US Department of Justice's (DOJ) Safe Harbor Provision, adopted by US Department of Transportation (DOT), if 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 2015 ACS 5-year estimates, Russian,

Spanish and Vietnamese qualify as “Safe Harbor” languages in Spokane County. STA will consider these as “Safe Harbor” languages in Spokane’s Public Transportation Benefit Area (PTBA).

Outreach Techniques

- Send updated information concerning fare changes or major service changes to community organizations (as identified in the distribution list) that have contact with LEP persons.
- Update the distribution list as needed.
- Send surveys to community organizations inquiring about the demographics of and the services provided to LEP persons.
- Work with community organizations to distribute STA information in needed languages.

Monitoring and Updating the LEP Plan

This plan is designed to be flexible and is one that can be easily updated. At a minimum, Spokane Transit will follow the Title VI program update schedule for 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 types of languages where translation services are needed?
- Is there still a need for continued language assistance for previously identified Spokane Transit programs? Are there other programs that should be included?
- Has Spokane Transit’s available resources, such as technology, staff, and financial costs, changed?
- Has Spokane Transit fulfilled the goals of the LEP plan?
- Were there any complaints received?

Dissemination of the Spokane Transit Limited English Proficiency Plan

Spokane Transit will post the LEP plan on its website at www.spokanetransit.com.

An LEP person may obtain copies of the plan upon request. Any questions or comments regarding this plan should be directed to:

Community Ombudsman and Accessibility Officer
1229 W. Boone Avenue
Spokane, WA 99201
(509) 325-6094
smillbank@spokanetransit.com

Appendix

13
Plan

2017 Title VI Plan

Attachment A—LEP

Attachment 1 Demographic Data

Table 4 Language Spoken at Home

S1601: Language Spoken at Home, 2015 American Community Survey

Subject	Spokane County, Washington		
	Total	Percent of specified language speakers	
		Speak English "very well"	Speak English less than "very well"
	Estimate	Estimate	Estimate
Population 5 years and over	461,320	97.40%	2.6%
Speak only English	92.7%	(X)	(X)
Speak a language other than English	7.3%	65.10%	34.9%
Spanish	2.4%	73.30%	26.7%
Other Indo-European languages	3.1%	66.10%	33.9%
Asian and Pacific Island languages	1.4%	51.80%	48.2%
Other languages	0.5%	57.00%	43%

Source: U.S. Census Bureau, 2015 American Community Survey 5-Year Estimates

Table 5 Language Spoken at Home by Ability to Speak English

Based on B16001: Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over, 2015 American Community Survey

Spokane County, Washington			
	Total Estimate	Speak English "very well"	Speak English less than "very well"
Total	451,005		
Speak only English	415,680		
Spanish or Spanish Creole	9,807	7,177	2,630
Russian	7,683	3,913	3,770
Vietnamese	2,005	710	1,295
Other Slavic languages	2,024	1,011	1,013
German	1,701	1,425	276
Other Pacific Island languages	1,208	459	749
Chinese	1,163	492	671
French (incl. Patois, Cajun)	1,006	820	186
Arabic	871	409	462
Tagalog	848	413	435
Korean	731	285	446
Italian	727	673	54
Other Indo-European languages	697	494	203
Japanese	618	438	180
Serbo-Croatian	598	373	225
African languages	593	188	405
Other Indic languages	369	111	258
Mon-Khmer, Cambodian	354	215	139
Hindi	243	228	15
Other West Germanic languages	238	230	8
Hmong	227	173	54
Other Native North American languages	218	199	19
Scandinavian languages	180	153	27
Urdu	172	149	23
Thai	147	73	74
Laotian	143	143	0
Other Asian languages	141	53	88
Persian	137	35	102
Hungarian	131	116	15
Polish	107	96	11
Portuguese or Portuguese Creole	96	50	46
Greek	49	49	0
Hebrew	49	39	10
French Creole	19	11	8
Other and Unspecified languages	16	16	0
Yiddish	9	9	0
Armenian	0	0	0
Gujarati	0	0	0
Navajo	0	0	0

**Table 6 Spokane Transit Authority Public Transportation Benefit Area (PTBA) LEP
Population by Census Tract**

Based on S1601, Language Spoken at Home by census tract, 2015 American Community Survey

CENSUS TRACT	POPULATION 5 YEARS AND OVER		
	Total	Speak English Less Than "Very Well"	
Census Tract 2	4,336	4.70%	205
Census Tract 3	4,712	4.00%	187
Census Tract 4	3,899	4.30%	168
Census Tract 5	2,970	0.00%	0
Census Tract 6	3,109	3.00%	94
Census Tract 7	4,129	1.80%	73
Census Tract 8	4,606	0.50%	23
Census Tract 9	6113	1.10%	66
Census Tract 10	5,125	0.60%	31
Census Tract 11	3,167	0.70%	21
Census Tract 12	1,992	0.60%	11
Census Tract 13	3,016	2.20%	66
Census Tract 14	5,828	5.30%	306
Census Tract 15	4,682	6.20%	290
Census Tract 16	3,296	16.70%	550
Census Tract 18	2,594	3.50%	90
Census Tract 19	3,165	1.20%	38
Census Tract 20	3,672	1.60%	59
Census Tract 21	2,219	2.80%	62
Census Tract 23	5,083	3.00%	155
Census Tract 24	2,789	3.20%	88
Census Tract 25	7,991	3.50%	279
Census Tract 26	4,932	9.20%	482
Census Tract 29	2,972	5.80%	173
Census Tract 30	2,434	6.80%	165
Census Tract 31	4,274	1.30%	55
Census Tract 32	2,537	1.50%	39
Census Tract 35	2,169	3.00%	66
Census Tract 36	4,030	3.60%	145
Census Tract 38	1,568	5.40%	85
Census Tract 39	1,964	2.40%	48
Census Tract 40	4,369	2.50%	110
Census Tract 41	2,102	1.20%	25
Census Tract 42	4,365	0.70%	29
Census Tract 43	3,207	3.00%	96
Census Tract 44	4,173	3.80%	159
Census Tract 45	3,282	0.5 %	18
Census Tract 46.01	3,460	7.70%	266
Census Tract 46.02	2,939	6.20%	182
Census Tract 47	5,897	4.20%	246
Census Tract 48	3,560	1.10%	39

16
Plan

2017 Title VI Plan

Attachment A—LEP

CENSUS TRACT	POPULATION 5 YEARS AND OVER		
	Total	Speak English Less Than "Very Well"	
Census Tract 49	5,630	2.50%	141
Census Tract 50	3,558	4.10%	147
Census Tract 101	5,737	2.40%	138
Census Tract 104.01	6,351	4.90%	314
Census Tract 104.02	6,790	4.60%	311
Census Tract 105.01	7,807	0.20%	17
Census Tract 105.03	7,289	0.40%	30
Census Tract 105.04	3,169	2.40%	64
Census Tract 106.01	3,401	1.10%	36
Census Tract 106.02	7,119	2.30%	166
Census Tract 107	5,973	2.70%	160
Census Tract 108	1,981	0.50%	10
Census Tract 109	4,865	1.60%	76
Census Tract 110	3,533	0.50%	16
Census Tract 111.01	5,137	6.90%	353
Census Tract 111.02	3,992	8.00%	321
Census Tract 112.01	7,179	10.90%	853
Census Tract 112.02	3,859	2.20%	84
Census Tract 113	6,969	4.30%	298
Census Tract 114	5,517	2.00%	108
Census Tract 115	1,394	2.10%	29
Census Tract 116	1,578	1.20%	19
Census Tract 117.01	2,083	1.10%	22
Census Tract 117.02	5,422	2.20%	147
Census Tract 118	3,861	2.50%	95
Census Tract 119	4,015	7.10%	284
Census Tract 120	3,806	4.90%	185
Census Tract 121	2,598	2.50%	66
Census Tract 122	2,166	6.60%	143
Census Tract 123	5,126	4.3%	222
Census Tract 124.01	3,931	1.90%	76
Census Tract 124.02	5,740	0.60%	32
Census Tract 125	3,539	4.80%	170
Census Tract 126	3,989	2.00%	79
Census Tract 127.01	3,621	0.70%	26
Census Tract 127.02	1,994	0.00%	0
Census Tract 128.01	3,801	2.20%	82
Census Tract 128.02	3,273	0.50%	18
Census Tract 129.01	3,073	2.60%	81
Census Tract 129.02	6,299	1.70%	105
Census Tract 130	7,423	3.90%	288
Census Tract 131	10,104	5.30%	538
Census Tract 132.01	7,475	2.00%	147
Census Tract 132.02	8,697	1.70%	147
Census Tract 134.01	4,600	2.80%	31
Census Tract 135	8,024	3.20%	260
Census Tract 136	4,376	2.90%	126
Census Tract 137	3,244	3.60%	118

17
Plan

2017 Title VI Plan

Attachment A—LEP

CENSUS TRACT	POPULATION 5 YEARS AND OVER		
	Total	Speak English Less Than "Very Well"	
Census Tract 138	2,463	1.60%	39
Census Tract 139	5,552	0.80%	45
Census Tract 140.01	5,412	3.20%	174
Census Tract 140.02	4,911	4.40%	214
Census Tract 141	5,520	0.80%	43
Census Tract 144	4,396	7.70%	339
Census Tract 145	1,754	1.40%	25
Total	413,638	3.23%	13,348

Attachment 2 LEP Organization Contacts

Table 7 2016 Survey Respondents

ORGANIZATION	CONTACT	
AHANA/Community Minded Enterprises	Ben Cabildo	Director
Catholic Charities Spokane Refugee and Immigration Services	Megan Case	Immigration Attorney
CCS International Students Program	Teresa Gay	Manager, Immigration & Student Success
CHAS Health	Lindsey Ruivivar	Public Policy & Development Manager
Country Homes Christian Church	Calli Foxworth	Director ESL
District 81 English Language Department	Heather Richardson	Director
East Central Community Center	JJ Jelinek	Executive Director
Global Neighborhood	Brent Hendricks	Executive Director
Gonzaga University English Language Center	Melissa Heid	Manager, Center for Global Engagement
Providence Sacred Heart Medical Center	Katy Roberts	Administrative Assistant, Case Management & Social Work Outreach Coordinator
Refugee Connections	Anna Bondarenko	
SCC ESL Program	Stoja Saric	Program Director
Spokane College of English Language	Joshua Porter	Director
Spokane International Translation	Laura Schwebs	Office Manager
World Relief Spokane	Katie Carver	Case Worker
World Relief Spokane	Sarah Smith	Case Worker
World Relief Spokane	Mark Finney	Case Worker

Table 8 2016 In-Person Meeting Participants

ORGANIZATION	CONTACT
CCS International Students Program	Teresa Gay
CHAS Health	Lindsey Ruivivar
Country Homes Christian Church	Calli Foxworth
Gonzaga University English Language Center	Amber McKenzie
Refugee Connections	Anna Bondarenko
SCC ESL Program	Stoja Saric
Spokane International Translation	Laura Schwebs

Attachment 3 Survey Introductory Email

Ben Cabildo
Director
AHANA/Community Minded Enterprises
25 W Main Ave, Suite 310
Spokane, WA 99201

Dear Mr. Cabildo:

As part of Spokane Transit's federal requirement under Title VI to provide equal access to transit for minority and low-income riders, we are updating our three-year LEP Plan ensuring access for persons with Limited English Proficiency (LEP). A crucial step in this process is gathering input from the agencies and community organizations who work most closely with LEP populations.

We have included a short survey on LEP persons [here](#). Please let us know if you will have any difficulty completing the survey before **August 31st**. We appreciate your help in gaining a clearer picture of the populations we serve, and how to better meet their needs.

We would also value the opportunity to meet with you in person for a more in-depth conversation during September or October. We will be in touch to schedule a time at your convenience, to learn more about specific steps we can take to make Spokane's transit system LEP-friendly.

We appreciate your time and insights. Should you have any questions, please do not hesitate to contact myself at (509) 232-6301 or Gordon Howell at (509) 325-6058.

Survey link: <https://www.surveymonkey.com/r/DK79NFD>

Sincerely,

Kathlyn Kinney
Transit Planning Assistant
Spokane Transit
(509) 232-6301
KKinney@spokanetransit.com

Gordon Howell
Planner VI, Grants Administrator
Spokane Transit
(509) 325-6058
GHowell@spokanetransit.com



Title VI, 42 U.S.C. § 2000d: "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."

Executive Order #13166: "[...] recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons."

Attachment 4 LEP Survey

Assisting Transit Use among Limited English Proficient (LEP) Populations

1. Please tell us your

Name

Agency

Email

Phone

2. About how many clients do you serve per month with limited English proficiency (LEP)?

☐ 10-20

☐ 20-50

☐ 50-100

☐ 100-500

☐ 500-1000

☐ 1000+

3. About how many of these are returning clients?

0% 100%

4. Giving your best guess, how many clients of each language do you serve per month?

	1-10	10-20	20-50	50-100	100+
Arabic	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Bosnian	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Burmese/Chin/Karen	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Chinese	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Farsi	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
French	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Kinyarwanda	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Kirundi	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

21
Plan

2017 Title VI Plan

Attachment A—LEP

Korean	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Marshallese	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Moldovan	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Nepali	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Russian	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Somali	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Spanish	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Swahili	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Thai	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ukrainian	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Vietnamese	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other (please specify below)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other languages

5. About what percent of your LEP clients are literate in their native language?

0%

100%

☐

6. About what percent can understand most verbal communication in English?

0%

100%

☐

7. About what percent can understand most written communication in English?

0%

100%

☐

8. How important is transit to your LEP clients?

Not important

Very important

☐


9. How often do LEP clients express difficulty using or accessing transit service?

Never

Very often

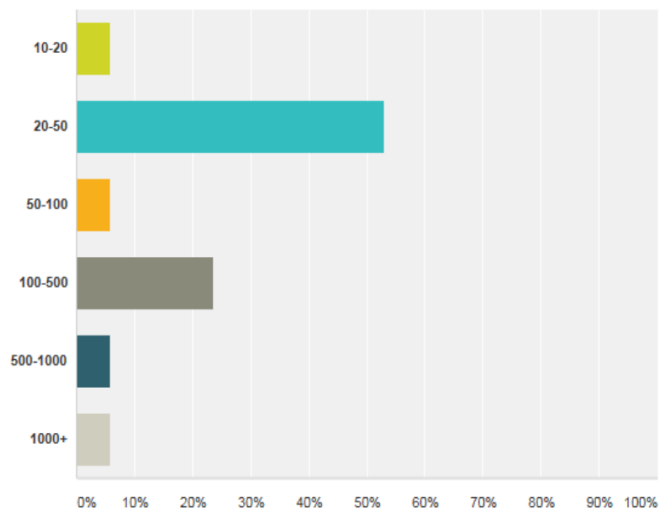
☐

10. What is the biggest difficulty expressed by LEP clients in using transit?

Powered by
 **SurveyMonkey®**
See how easy it is to [create a survey](#).

Attachment 5 LEP Survey Results

1. Participants gave their contact information.
2. About how many clients do you serve per month with limited English proficiency (LEP)?



3. About how many of these are returning clients? **65%**
4. Giving your best guess, how many clients of each language do you serve per month?

	1-10	10-20	20-50	50-100	100+	Total
Russian	6	5	2	0	3	16
Spanish	6	2	1	1	3	13
Arabic	4	4	3	1	2	14
Burmese/Chin/Karen	3	4	2	0	1	10
Marshallese	4	2	3	0	1	10
Bosnian	8	1	0	0	0	9
Chinese	7	2	2	0	0	11
Farsi	4	5	1	0	0	10
French	9	1	0	0	0	10
Kinyarwanda	2	4	1	0	0	7
Kirundi	5	2	0	0	0	7
Korean	11	0	1	0	0	12
Moldovan	6	0	1	0	0	7
Nepali	3	6	0	1	0	10
Somali	6	3	1	0	0	10
Swahili	6	3	1	1	0	11
Thai	12	0	0	0	0	12
Ukrainian	9	4	0	1	0	14
Vietnamese	4	3	2	2	0	11
Other	2	1	1	0	0	4

5. About what percent of your LEP clients are literate in their native language? **74%**
6. About what percent can understand most verbal communication in English? **43%**
7. About what percent can understand most written communication in English? **38%**
8. How important is transit to your LEP clients (on a scale of 0 = “not important” to 100 = “very important”)? **83**
9. How often do LEP clients express difficulty using or accessing transit service (on a scale of 0 = “never” to 100 = “very often”)? **47**
10. What is the biggest difficulty expressed by LEP clients in using transit?
 - a. **Stop locations in proximity to their residences. Price of transit. Weekend and Holiday schedule changes.**
 - b. **Understanding the routes and making transfers.**
 - c. **Length of time spend traveling on the bus; bus unavailability in certain parts of Spokane area during day.**
 - d. **They cannot read in English to understand the schedules.**
 - e. **Occasional harassment, limited access.**
 - f. **Cost and/or hours of operation.**
 - g. **Not being able to understand when to get off the bus.**
 - h. **Not being able to read maps because they are not available in their language.**
 - i. **Bus stops not conveniently located. They have to walk long ways.**
 - j. **infrequent service**
 - k. **Finding routes near their housing that can get them to SFCC or SCC within 50 minutes. They reside in heavier populated areas of Spokane and Spokane Valley.**
 - l. **The other issue is fear for Safety at the Plaza downtown while they must wait for buses.**

Attachment 6 Survey and In-Person Meeting Analysis

2016 LEP Outreach Goal and Information-Gathering Process

Building upon our last outreach process, the purpose of the current outreach was to gain new, updated information, and to translate this into viable action items. STA first evaluated survey results from three years prior, particularly the responses that detailed 1) difficulties in accessing transit, 2) ways for STA to assist, and 3) best ways of reaching out to LEP clientele. Responses of a similar nature were tallied together. Results were as follows.

Table 9 2016 Survey Results with the Number of Organizations giving each Response

DIFFICULTY		WAYS TO ASSIST		WAYS OF REACHING CLIENTELE	
Language barrier (written & spoken)	4	Presentations by STA	3	Organization staff	4
Infrequent bus service	3	Translated materials (written/ website)	3	Surveys - translated	3
Bus schedule navigation	2	More frequent/ direct routes	2	Brochures/posters	1
Bus service out of range	1	Schedules - larger print, online	2	Community leaders	1
Computer illiteracy	1	Translation services (phone)	2	Facebook	1
Unfamiliarity with system	1	Bilingual staff/language training	1	Friends/employers	1
		Presentations to STA	1	Mail info to organization	1
		Refugee advisory council	1		
		Visual aids	1		

For the 2017-2019 update, it was determined to do an online data-driven survey attempting to quantify more closely the relative populations of each LEP language in the service area, followed by in-person meetings covering certain topics in more depth, especially barriers to transit, and specific actions STA might take together with community organizations to overcome those barriers.

Online Survey

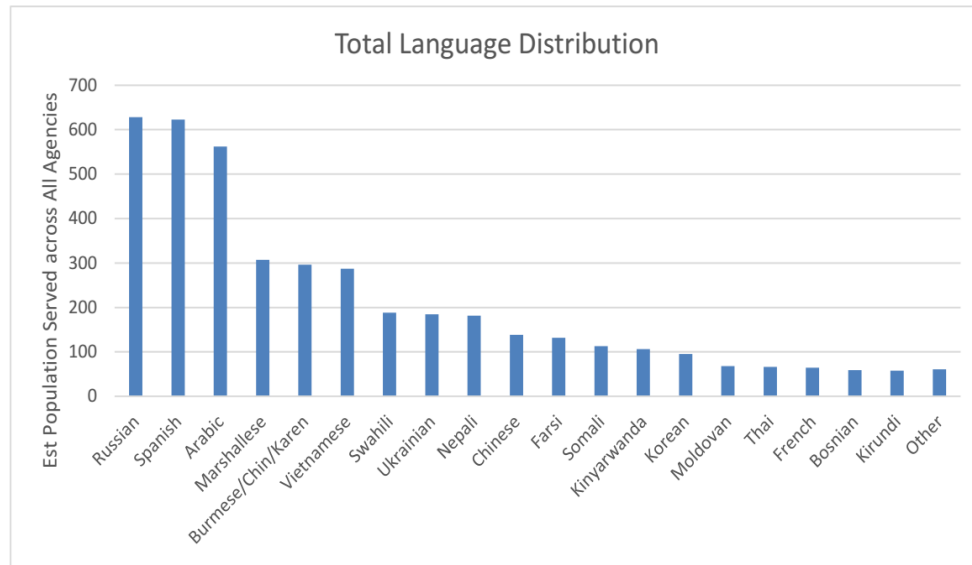
The online survey was administered through SurveyMonkey and can be found in Attachment 4. The list of respondents is found in Attachment 2, and their responses in Attachment 5.

LEP Language Distribution

Questions 2 and 4 dealt with the number of LEP persons encountered in an average month. Each agency stated a range for the population of each language served; the chart below averages each

range and adds these together over all the agencies surveyed. The result is a snapshot of the relative numbers of each LEP language in the service area.

Figure 1 Relative Distribution of Languages in the Spokane Transit Service Area



Barriers to Transit

Of the barriers to transit cited in the online survey, distance to stops was cited most frequently, followed by English-only information and limited service span, followed by cost, infrequent service, travel time, safety, and system understandability. System understandability includes items such as “making transfers” and “weekend/holiday schedule changes” (see Attachment 5).

Table 10 Barriers to Transit, and Number of Organizations Citing each Barrier

BARRIER	COUNT
Distance to stops	6
Information in English only	3
Limited service span	3
Cost	2
Infrequent service	2
Travel time	2
Safety	2
Understandability of system	2

In-Person Meetings

In-person meetings were scheduled to gain additional information and action items. The interviews consisted mainly of questions specific to each organization, as each has different resources and levels of contact with its LEP clients. In two cases, and a 90-second Post-It note brainstorming session was conducted on ways to overcome a particular transit barrier. The list of meeting participants can be found in Attachment 2. A full list of questions and responses is on file.

Action Items Gleaned from In-Person Meetings

The table below provides a list of suggestions for assisting LEP transit use, identified during in-person meetings with LEP-serving agencies, as well as the estimated cost and impact of each step. The table serves as a tool to gauge the relative feasibility and effectiveness of implementing a given measure.

Table 11 Suggestions from In-Person Meetings for Assisting LEP Transit Use, and Relative Costs & Impacts of Implementation

RESOURCE	COST	IMPACT	NON-COST BARRIERS (CULTURAL, LOGISTICS, TECHNOLOGY, ETC.)
Create an STA-branded language assistance card for LEP persons to carry, to be passed out at information fairs or events.	Low	Med	Med
Make the Google Translate feature on the website more accessible	TBD	High	Med
Provide name badges for multilingual staff with “I speak _____” translated into each applicable language and a flag representing their country of origin	Low	Medium	High
Use in-house graphic design capabilities to create illustrated placards to be placed on buses showing how to use fareboxes, how to request a stop, etc.	High	High	High
Develop an online map tool that allows agencies to print out their own customized maps highlighting major locations and relevant bus routes. Inquire about using the SCC brochure as a base map	High	Low	High
Attend student orientations at the colleges during the first week of classes. Bring info cards with key STA web links.	Med	Med	Med
Place messages welcoming speakers of different languages on buses in overhead advertising spaces	Med	High	Med
Print large format maps of the stops on each route to be placed on buses in overhead advertising spaces (similar to route maps in US and European subways)	High	High	Med
Continue to build LEP topics into the vehicle operator and security personnel training curriculum	Med	High	Low

Create a “How to Ride the Bus” video on how to pay fares, etc., to be distributed to interested organizations and posted on website	Med-High	High	High
Post basic how-to and safety information, such as how to ride the bus, how to pay fares, and who to ask for help, in each of the major LEP languages, on an info board at the Plaza. Make the info board welcoming and artistic, with photos of representatives from each LEP community, and in a color scheme resonant with the flags from each country.	Med-High	High	Med
Conduct a focus group on usability of the STA website	High	High	Med
Provide an updated photo of security officers and rendering of the new security station at the Plaza to the Community Colleges of Spokane for their International Students Program safety orientation	Low	Med	Low
Place a Spokane International Translation language identification card on each of the fixed-route buses, where the driver can easily access it.	Low	Med	Med
Meet with Sterling International staff to brainstorm ways of facilitating commutes to the Spokane Industrial Park for LEP persons.	Low	Low	Low
Continue to contract with Spokane International Translation to translate vital documents on the STA website, including into Vietnamese.	Low	Med	Low
State a preference for multilingual skills in new STA hires	Low	Med	High
Include a written and spoken translation of upcoming stops into one to two top languages at major LEP-serving locations (ex. the SCC Adult Education Center and Hillyard CHAS Clinic)	High	Med	High
Publish a similar simplified map showing the transit routes that travel between those locations	Med	Med	Med
Provide a webinar at an LEP-serving organization such as CHAS Health	Med	Med	Med
Print translated route maps/schedules	High	Med	High
Conduct an operator survey of the frequency with which passengers encounter difficulty paying fares or requesting a stop due to language barriers	Med	Med	High
Conduct an LEP users’ focus group on the usability of the Real Time Info app	Med-High	Med	High
Conduct a focus group on the usability of STA telephone interpretation services	Med-High	Med	Med
Track usage of the Google Translate feature on the website	TBD	Med	TDB
Add a translate feature to the Real Time Info web-based app	TBD	Med	High

29

2017 Title VI Plan

Attachment A—LEP

Plan

Provide an in-person presentation at an LEP-serving organization such as CHAS Health	Med	Low	Med
KEY			
COST		IMPACT	
Low Cost = \$10-50 to implement		Low Impact = 10-20 persons reached/year	
Med Cost = \$50-2000 to implement		Med Impact = 20-1000 persons reached/year	
Med-High Cost = \$2000-10,000 to implement		High Impact = 1000+ persons reached/year	
High Cost = \$10,000+ to implement			

Attachment 7 River Linguistics Reference Sheet

31
Plan

2017 Title VI Plan

Attachment A—LEP



811 West 2nd Ave. Suite #208
Spokane, WA 99201
(509) 228-3521
sta@riverlinguistics.com
riverlinguistics.com

REFERENCE SHEET

Call toll free (855) 800-5789

When greeted by a call center coordinator, please relay:

1. Your full name
2. Request the language needed, or ask for assistance in identifying the language
3. Hold momentarily while your Interpreter is connected
4. The coordinator will inform you that the interpreter is on the line and will provide you with the interpreters ID number.
5. Explain the objective of the call to the interpreter, then proceed by speaking directly to the Limited English Proficient speaker in the first person.
6. Upon completion of the call, all parties should simply hang up. Your time will be automatically recorded.

Your Account Code is:

811 West 2nd Ave. Suite #208 Spokane, WA 99201

TIPS ON WORKING WITH INTERPRETERS

1. Speak at a reasonable pace (not too fast) and enunciate clearly.
2. Speak in short phrases and pause frequently so that the Interpreter can convey the information quickly and accurately. If you talk for too long, you will have to wait a while for the interpretation, and you run the risk that the Interpreter will forget details and may have to ask you to repeat something.
3. Address the Limited English Proficient (LEP) person directly (e.g., "What is your name" not "Ask him what his name is").
4. Speak "plain English" and avoid jargon or "shop talk" that may be specific to your work or industry.
5. Sometimes interpreters will require clarification of unfamiliar terms. If your Interpreter asks you to define a term, try to rephrase it in other words. The Interpreter may have to ask the LEP person to clarify terms as well, but will let you know before addressing the person in the other language.
6. Your Interpreter will let you know if he or she has problems hearing you or the other party, who may be calling on a cell phone or in a room with background noise.
7. Remember that interpreted communication typically takes twice as long as communication in the same language; please be patient.
8. It is our goal to make communication between you and your LEP clients or patients as smooth as possible. We appreciate your cooperation and encourage you to contact us should any issues arise.

IF YOU NEED AN INTERPRETER, PLEASE POINT TO YOUR LANGUAGE

IF YOU ARE UNSURE
WHICH LANGUAGE
YOU NEED, LET THE
OPERATOR KNOW AS
THEY ARE TRAINED
TO IDENTIFY YOUR
REQUIREMENTS

Albanian: Shqip Nëse keni nevojë për përkthyes, tregoni gjuhën tuaj. Armenian: Հայերեն Եթե դուք թարգմանիչի կարիք ունեւն, ինքզնուդ ներ ցանկանաճէք ձեր լեզուն:	Arabic: عربي إذا كنت في حاجة إلى مترجم، أشير إلى اللغة المطلوبة
Cambodian: ខ្មែរ បើអស់លោកត្រូវការអ្នកបកប្រែ សូមចង្អុលទៅកាន់ភាសារបស់ខ្លួន	Bosnian: Bosanski Ako vam je potreban prevodilac, označite vas jezik.
Dutch: Nederlands Als u een tolk nodig hebt, wijs dan uw taal aan.	Croatian: Hrvatski Ako vam je potreban prevodilac, označite vas jezik.
Finnish: Suomi Jos tarvitset tulkin, osoita haluumaasi kielivalintaa.	Farsi: فارسي اگر به مترجم احتیاج دارید لطفاً با انگشت زبان خود را نشان دهید.
German: Deutsch Bitte zeigen Sie auf Ihre Sprache, wenn Sie einen Dolmetscher brauchen.	French: Français Si vous avez besoin d'un interprète, indiquez votre langue.
Gujarati: ગુજરાતી જો તમને ભાષાંતરકર્તાની જરૂર હોય તો તમારી ભાષા તરફ ચીંટો.	Greek: Ελληνικά Εάν χρειάζεστε διερμηνέα, παρακαλώ δείξτε τη γλώσσα σας.
Hebrew: עברית אם הנכם זקוקים לתורגמן, הצביעו על השפה שלכם.	Haitian Creole: Kreyòl Ayisyen Si w bezwen yon entèprèt, montre ki lang ou pale.
Hmong: Hmoob Yog koj xav tau tus neeg pes lus, taw tes rau koj yam lus.	Hindi: हिन्दी यदि आप को भाषा अनुवादक की आवश्यकता हो, तो अपनी भाषा की ओर इशारा करें।
Ibo: Ibo Oburu na ichoro onye nkowa okwu, tuo aka na asusu gi	Hungarian: Magyar Ha tolmácsra van szüksége, mutasson anyanyelvére.
Japanese: 日本語 通訳をお捜しの場合、必要な言語を指し示してください。	Italian: Italiano Se avete bisogno di un interprete, puntate alla vostra lingua.
Laotian: ພາສາລາວ ຖ້າທ່ານຕ້ອງການຢາຍແຜ່ພາສາລາວ ຈົ່ງຊີ້ໃສ່ພາສາທີ່ທ່ານຕ້ອງການ	Korean: 한국어 통역서비스가 필요한 언어를 선택하십시오.
Norwegian: Norsk Pek på ditt språk hvis du trenger hjelp av en oversetter.	Latvian: Latviešu Ja Jums ir vajadzīgs tulks, lūdzu, norādiet Jūsu valodu.
Portuguese: Português Se precisa de um intérprete aponte para o nome da língua que fala.	Polish: Polski Jeśli potrzebują Państwo tłumacza, proszę wskazać na swój język.
Romanian: Română Daca aveti nevoie de un interpret, va rugam indicati catre limba vorbita	Punjabi: ਪੰਜਾਬੀ ਜੇ ਤੁਹਾਨੂੰ ਇੱਕ ਦੁਸਾਰੀ ਦੀ ਲੋੜ ਹੈ, ਤਾਂ ਕਿਰਪਾ ਕਰਕੇ ਆਪਣੀ ਭਾਸ਼ਾ ਵਲ ਸੰਕੇਤ ਕਰੋ।
Serbian: Српски Ako vam je potreban prevodilac, označite Vaš jezik.	Russian: Русский Если Вам нужен переводчик, укажите свой язык.
Spanish: Español Si necesita un intérprete, señale su idioma.	Somali: Soomaali Hadaad u baahan tahay qof kuu turjuma, tilmaamo luqadaada.
Tagalog: Tagalog Kung kailangan ninyo ng interpreter o tagasalin, ituro ang inyong wika.	Swedish: Svenska Om du behöver tolk, var god peka på ditt språk.
Thai: ไทย หากท่านต้องการล่าม กรุณาชี้ที่ภาษาของท่าน	Tamil: தமிழ் மொழிபெயர்ப்பு தேவையென்றால் தங்களுக்குள் மொழியைக் குறிப்பிட்டுக் கொடுக்கவும்.
Yiddish: אידיש אויב איר נויטיגט זיך אין א דאלמעטשער, ביטע צייגט אן אייער שפראך	Vietnamese: Tiếng Việt Nếu cần thông dịch viên xin hãy chỉ vào ngôn ngữ của quý vị. Yoruba: Ede Yoruba Ti o ba nilo ogbufọ, jọwọ tọka sí ede rẹ

HOW TO SAY "ONE MOMENT PLEASE" IN 20 LANGUAGES

Language:	Written in Language	Phonetic Pronunciation
Albanian:	Nje minutë ju lutem.	nee-yeh mee-noo-teh you loo-tem
Arabic:	دقيقة من فضلك	dakika meen fahdlock (masculine) dakika meen fahdlick (feminine)
Chinese:	请稍候	ching show hoe
French:	Un moment s'il vous plaît.	uhn moe-mon seal-voo-play
German:	Einen Moment bitte.	eye-nen moment bee-teh
Gujarati:	મેહરબાની કરીને એક પલ થોભશો	meherbani kariné ek pul thobso
Haitian Creole:	Tanpri fann yon ti moman.	tan-pree tan yaw tee moe-maw
Hindi:	कृपया एक पल प्रतीक्षा करें	kreepya ek pal prateeksha karen
Italian:	Un momento per favore.	oon moe-mento pair fah-vore-ay
Japanese:	少々お待ちください。	shosho omachi kudasai
Korean:	잠깐 기다리세요	jam-kan ki-da-ri-se-yo
Polish:	Moment, proszę.	moment prosheh
Portuguese:	Um momento, por favor.	um moe-mento, poor fah-vor
Russian:	Подождите, пожалуйста.	padazhdite, pazhalusta
Spanish:	Un momento por favor.	oon moe-mento poor fah-vor
Swahili:	Subiri kidogo	soo-bee-re key-dough-go
Tamil:	தயவு செய்து ஒரு நிமிடம்	dye-ya-vu seydu oru nimi-dom
Vietnamese:	Xin chờ một chút	sin char moe-chew
Marshallese:	Köttar joun minit	cut-tar jew-won minute
Amharic:	አንድ ጊዜ አባከዎኝ	and gee-zeh e-ba-kon

INTERPRETING SCENARIOS

SCENARIO #1

The LEP person will be present planned situations

- Organize the necessary telephone equipment such as a conference phone, a hands-free phone or a dual handset phone. If these are not available, you will need to share the handset with the LEP person
- Dial pre-assigned toll free number and request the language needed
- Provide access and department codes if required
- Remember you can also book an interpreter for future appointments
- When the interpreter comes on the line, introduce yourself and the LEP person to the interpreter. Clearly and briefly describe the purpose of the session and your location (e.g. hospital ward, front counter, private interview room). Advise the interpreter if it is an emergency situation
- Proceed with the session

SCENARIO #2

The LEP person is present unplanned situations

- Organize the necessary telephone equipment
- Dial the pre-assigned toll free number and provide information such as access and department codes and the language needed
- You will be placed on hold while we connect you with the interpreter. When the interpreter comes on the line, introduce yourself and proceed as in planned situations

LEP = Limited English Proficiency

🏢 811 West 2nd Ave. Suite #208 Spokane, WA 99201

INTERPRETING SCENARIOS

SCENARIO #3

The LEP person has phoned you

- Identify the language the LEP person speaks and ask for the person's name. We will provide tip cards and other reference material to help communicate with the non-English speaking person
- You will be placed on hold while the interpreter is connected
- When you are connected, introduce yourself and the LEP person to the interpreter. Ask the LEP person the purpose of their phone call. Proceed with the session using the Communication Tips

SCENARIO #4

You need to phone the LEP person

- Dial the pre-assigned toll free number and request a telephone interpreter. You will need to have access and department codes available as well as the required language
- You will be placed on hold while the interpreter is connected
- Once the interpreter is on the line tell him/her that you need to dial out to an LEP person and provide the phone number to dial. Also provide necessary instructions in case the number is busy or LEP is unavailable
- You will be placed on a brief hold while the interpreter is dialing the requested number
- When you are connected, introduce yourself and confirm that you are speaking with the right LEP person. Clearly and briefly describe the purpose of the session. Proceed with the session using the Communication Tips

LEP = Limited English Proficiency

🏢 811 West 2nd Ave. Suite #208 Spokane, WA 99201

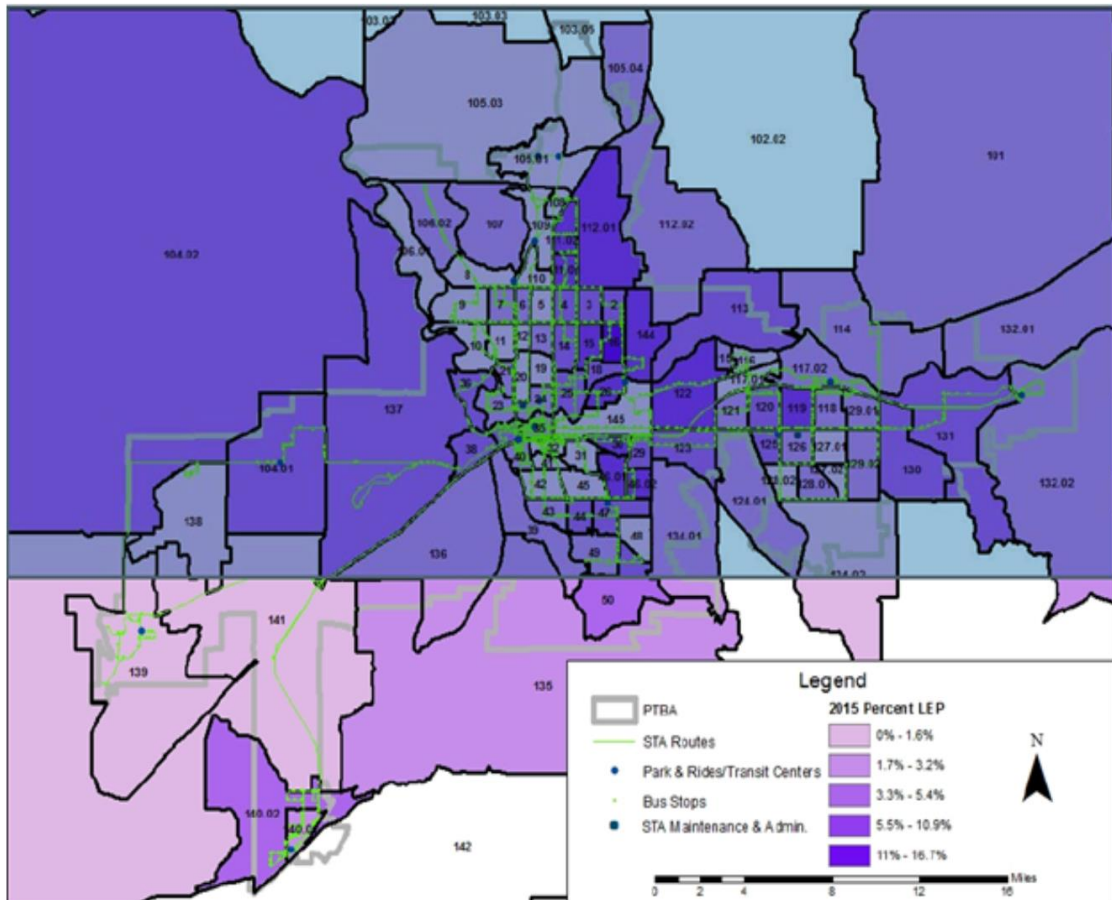
Maps

32
Plan

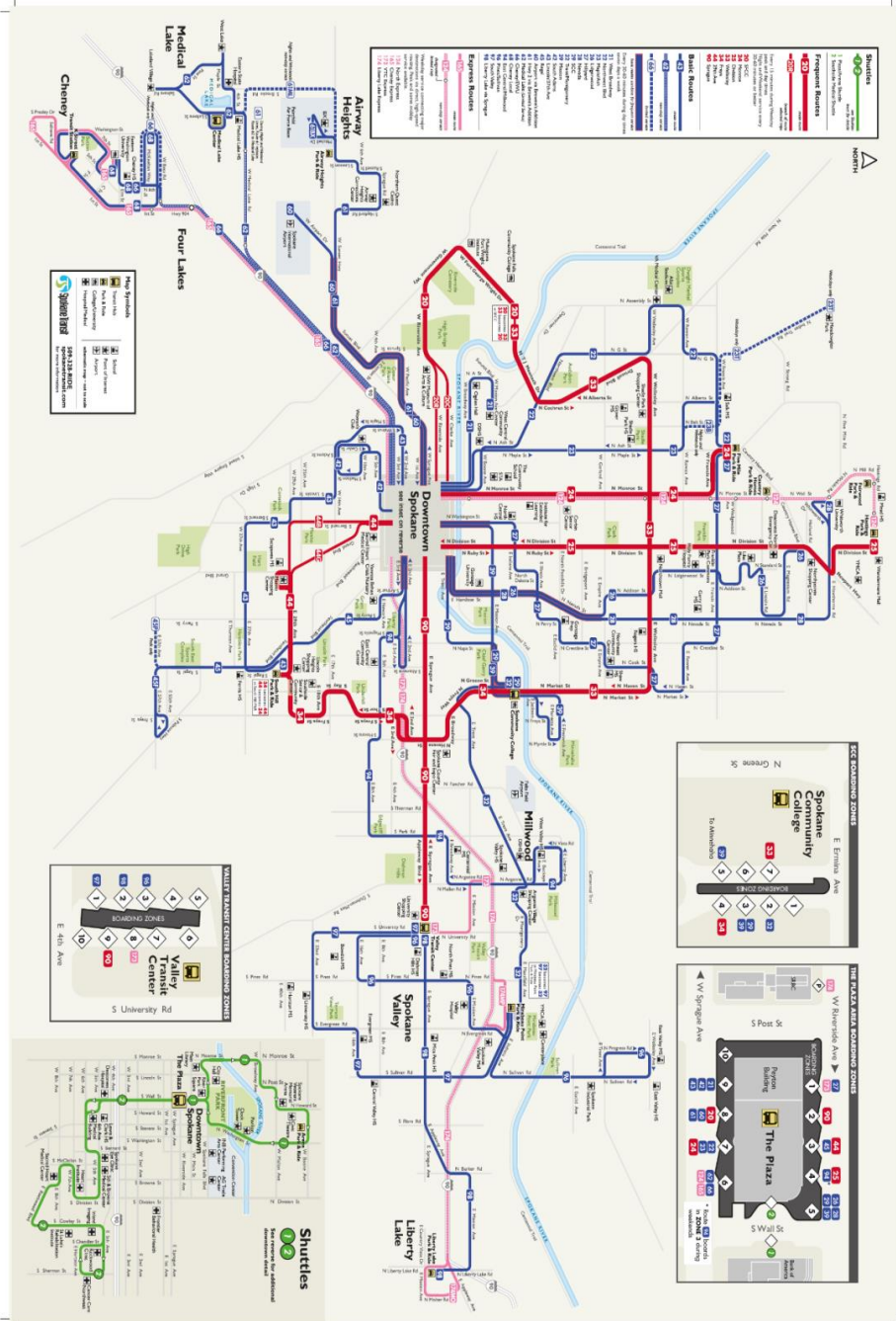
2017 Title VI Plan

Attachment A—LEP

Map 1 PTBA LEP Population by Census Tract



Map 2 STA System Map



34
Plan

2017 Title VI Plan

Attachment A—LEP

Spokane Transit assures nondiscrimination in accordance with Title VI of the Civil Rights Act of 1964 and the American Disabilities Act. For more information, visit www.spokanetransit.com. All phone numbers are accessible for people who are deaf or hard of hearing through Relay 711.

Upon request, alternative formats of this document will be produced for people who are disabled. Call (509) 325-6094 or email smillbank@spokanetransit.com.