### Title VI Plan For the Federal Transit Administration And Washington State Department of Transportation

July 1, 2024 to June 30, 2026

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#### Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color and national origin in programs and activities receiving Federal financial assistance.

Hopelink is committed to ensuring that no person is excluded from participation in or denied the benefits of its transit services based on race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.A

#### **Title VI Complaint Procedures**

Hopelink is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services based on race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.A If you believe you have been subjected to discrimination under Title VI, you may file a complaint.

#### How to file a Title VI Complaint

You may file a signed, written complaint up to one hundred and eighty (180) days from the date of alleged discrimination. The complaint should include the following information:

- Your name, mailing address, and how to contact you (i.e., telephone number, email address, etc.)
- How, when, where, and why you believe you were discriminated against. Include the location, names, and contact information of any witnesses.
- Other information that you deem significant

A form is available at Hopelink and our website which may be completed for this purpose (Attachment B). Web Location: <u>https://www.hopelink.org/programs/transportation/</u>

#### The complaint may also be filed in writing with Hopelink at the following address:

Hopelink, Title VI Coordinator VP of Transportation 8990 154th Avenue Northeast Redmond, Washington 98052

Or via email: TitleVI@hopelink.org

NOTE: Hopelink encourages all complainants to certify all mail that is sent through the U.S. Postal Service and/or ensure that all written correspondence can be tracked easily. For complaints originally submitted by facsimile, an original, signed copy of the complaint must be mailed to the Title VI Coordinator as soon as possible, but no later than 180 days from the alleged date of discrimination.

#### Reasonable accommodations, translation, and interpretive services

Upon request, Hopelink can provide this policy and the agency's comment form in alternate formats (i.e. Braille, large print, audio version) and languages other than English.

For customers who speak a language other than English, Hopelink will use the services of Language Line to facilitate calls.

What happens to your complaint after it is submitted to Hopelink?

Hopelink will directly address all complaints alleging discrimination based on race, color, or national origin in a service or benefit provided by Hopelink. Hopelink shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. Additionally, Hopelink shall make every effort to address all complaints expeditiously and thoroughly.

If additional information is needed to investigate the complaint, Hopelink will contact the complainant. Please note that in responding to requests for additional information, a complainant's failure to provide the requested information may result in the administrative closure of the complaint.

Once sufficient information for investigating the complaint is received by Hopelink, a written response will be drafted subject to review by the agency's attorney. If appropriate, Hopelink's attorney may administratively close the complaint. In this case, Hopelink will notify the complainant of the action as soon as possible.

#### How you will be notified of the outcome of your complaint

Hopelink will send a final written response to the complainant and advise the complainant of their right to 1) appeal within seven calendar days of receipt of the final written decision from Hopelink, and/or 2) file a complaint externally with the U.S. Department of Transportation and/or the Federal Transit Administration. Every effort will be made to respond to Title VI complaints within 60 working days of receipt of such complaints, if not sooner.

A review team consisting of Hopelink's Transportation Directors, Hopelink Leadership Team, and at least one other staff member will review customer appeals. If the customer is not satisfied with the outcome of the appeals process, or how Hopelink handled their complaint, the customer may file a complaint with any of the following organizations:

Washington State Department of Transportation Public Transportation Division	Federal Transit Administration Office of Civil Rights	U.S. Department of Justice Civil Rights Division
	Attn: Complaint Team	Attn: Coordination and
Attn: ADA & Title VI	East Building, 5th Floor –	Review Section - NWB

Coordinator	TCR	950 Pennsylvania Ave
PO Box 47387	1200 New Jersey Avenue, SE	NW Washington, DC
Olympia, WA 98504-7387	Washington, DC 20590	20530-0001
transit@wsdot.wa.gov	FTACivilRights	
	Communications@dot.gov	

#### **Reporting and Tracking**

Hopelink will retain complaint files a minimum of 6 years beyond the end of the project in compliance with the Washington State Archives Office's Common Records Schedule and the WSDOT Consolidated Grant Program requirements. Hopelink's complaint files will include:

- Date Hopelink received the complaint.
- Summary of the complaint's allegations.
- Status of the complaint.
- Actions taken by Hopelink, including, if applicable, the forwarding of a complaint for investigation by WSDOT, the Federal Transit Administration, or the U.S. Department of Justice.

#### I. Record of Title VI or Other Civil Rights, Investigations, Complaints or Lawsuits

To date, there have been no Title VI investigations, complaints or lawsuits.

#### II. Limited English Proficiency (LEP) Plan

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

#### Census.

The United States is home to millions of national origin minority individuals who are Limited English Proficient (LEP). That is, their primary language is not English, and they cannot speak, read, write or understand the English language at a level that permits them to interact effectively with recipients of Federal financial assistance.

Because of language differences and the inability to effectively speak or understand English, persons with LEP may be subject to exclusion from programs or activities, experience delays or denial of services. These individuals may be entitled to language assistance concerning a particular type of service. The federal government and those receiving assistance from the federal government must take reasonable steps to ensure that LEP persons have meaningful access to the programs, services, and information those entities provide.

This will require agencies to establish creative solutions to address the needs of this ever-growing population for whom English is not the primary language.

According to the 2018 American Community Survey Data for King County, English is spoken by 89.5% of King County. The following represents the percentage of non-English proficiency households by language.

In King County, 214,094 people (10.5%) have limited English proficiency; that is, they speak English less than "very well". Of those persons with limited English proficiency, about 49% speak Asian and Pacific Island languages, 25% speak Spanish, 17% speak other Indo-European languages, and 9% speak other languages.

Language	% of LEP in King County
Spanish	27%
Chinese	15%
Vietnamese	10%
African Languages	7%
Korean	6%
Tagalog	5%
Russian	4%

#### **ANALYSIS OF FACTORS**

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

Hopelink jurisdiction covers all of King County, which is largely English-speaking. Most of the population with whom we do business (individuals wishing to ride transit) speak English, though we also strive to serve community members who don't speak English as well. Reviewing 2021 Census and OPSI data, below are the estimates for the top spoken languages in King County:

Language Spoken at Home	Total Number	Percentage
Speak only English	5,213,096	69.59%
Speak other Language	626,071	30.41%
Spanish	28,292	10.87%
Chinese-Mandarin	5,747	2.21%
Vietnamese	5,183	1.99%
Somali	3,610	1.39%
Russian	3,028	1.16%
Chinese-Cantonese	2,074	0.80%
Arabic	1,910	0.73%
Korean	1,815	0.70%
Hindi	1,761	0.68%
Ukrainian	1,776	0.68%

Table 1:

https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fofm.wa.gov%2Fsites%2Fdefault%2Ffiles%2Fpublic%2Fdataresearch%2 Fpop%2FLEP%2Fofm\_pop\_limited\_english\_proficiency\_estimates\_2021.xlsx&wdOrigin=BROWSELINK

#### Factor No. 2. The frequency with which LEP individuals come into contact with the service.

All contacts with Hopelink are made through in-person or phone engagements. We serve LEP persons daily via our five service centers, non-emergency medical transportation call center, or a variety of mobility management programming. In fiscal year 2024, Hopelink Mobility Management provided services to 247 clients through our public transit orientations, which target immigrants and refugees with limited English.

#### Factor No. 3: The nature and importance of service provided by Hopelink.

Hopelink provides essential services to the public through its integrated array of programs that enable families in crisis to progress toward self-sufficiency. Hopelink's programs focus on food, housing, family development, adult education (including literacy programs), transportation, and emergency financial assistance.

Delays in Hopelink's services due to language barriers would adversely affect its clients. For example, Hopelink's non-emergency medical transportation for Medicaid clients provides much-needed healthcare access for many low-income individuals with Limited English Proficiency.

For many King County residents, an inability to understand or navigate the public transportation system becomes a barrier to access. This is especially true for vulnerable populations and those who are new to this country, including people with disabilities, older adults, low-income individuals, and those with limited English proficiency. Hopelink's Mobility Management team provides education and resources through various travel training programs throughout King County. Programs provide information about travel options, trip plans, one-on-one transportation assistance, and training for partners who work with clients. In 2023, 12,345 people received resources through these programs.

**Factor No. 4.** The resources available to the recipient of the federal funds to assure meaningful access to the service by LEP persons.

Hopelink employs a workforce that supports the diversity of our clientele. We also use Language Line and onsite video translation services to meet the needs of our clients.

Brochures for the Medical Transportation program are translated in Russian and Spanish. Community Services provides outreach materials in multiple languages, as well as signage in our grocery store model food bank. Hopelink has also translated informational forms, surveys and other forms as needed. In Mobility Management, over \$7,000 was spent in translation and interpretation services in FY2024.

#### III. Implementation Plan

Hopelink has implemented its plan and will review it annually, including any contacts with the LEP persons, to determine the frequency of contacts, the language used, and how the contacts were handled.

We identify LEP persons in the service area by partnering with community-based organizations that serve

LEP populations, including resettlement agencies, social service organizations, and immigrant advocacy agencies. Call takers are trained to use Language Line services. Most Mobility Management brochures and outreach materials are translated into the core languages, and our outreach e-newsletter is available in English and Spanish. Hopelink's Title VI policy and a Complaint Form are available on our website. All Mobility Management print materials, agendas, and newsletters contain our Title VI policy. Additionally, staff are trained on how the Title VI plan works to be consistent in their application.

To comply with 49 CFR 21.9(d), Hopelink and its sub-recipients must provide information to beneficiaries regarding their Title VI obligations and inform beneficiaries of the protections against discrimination afforded them by Title VI. Hopelink has established a statement of rights and a policy statement.

#### IV. Notifying Beneficiaries of their Rights under Title VI

- 1. Our website includes our Title VI policy and complaint form.
- 2. Our Title VI policy, which includes how to receive notice of this policy in four other languages, is displayed on our external coalition meeting agendas and e-newsletters to external partners.

#### V. Analysis of Construction Projects

Over the last three years, Hopelink has not completed a construction project requiring an environmental assessment (EA) or environmental impact statement (EIS).

#### VI. Inclusive Public Participation

Community Outreach is a requirement of Title VI. Recipients and sub-recipients shall seek out and consider the viewpoints of minority and low-income populations while conducting public outreach. Recipients have wide latitude to determine what specific measures are most appropriate. They should make this determination based on the composition of the affected population, the public involvement process, and the resources of Hopelink.

Hopelink has engaged the public in its planning and decision-making processes, as well as its marketing and outreach activities. Hopelink has developed a comprehensive Public Participation Plan (PPP), which outlines the goals and objectives for public participation (See Attachment C).

In March 2024, we integrated a new trip planner into our FindARide.org website. It focuses on the mobility needs of older adults and people with disabilities across Pierce, King, and Snohomish counties. The trip planner is Phase 1 of a multi-phase roadmap and our One-Call/One-Click development. Our trip planner's development was made possible by support from the Washington State Department of Transportation, King County Metro, Sound Transit, Hopelink, and other partners. The conceptualization of this tool came directly from inclusive planning.

Hopelink Mobility Management hosts regular mobility coalition meetings across King County, with over 100

unique organizations participating in 2024. We also conduct community outreach at partner locations, including resource fairs, housing complexes, libraries, food banks, medical facilities, senior centers, and social service organizations. In addition to in-person outreach, we perform a variety of virtual engagements, including posting on social media, our website, and e-newsletters.

#### ATTACHMENT A

#### Hopelink Title VI Notice to the Public

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color and national origin in programs and activities receiving Federal financial assistance. Hopelink is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.B

If you believe you have been subjected to discrimination under Title VI, you may file a complaint with Hopelink's Title VI Coordinator. For additional information regarding Title VI complaint procedures and/or information regarding our nondiscrimination obligations, please contact Hopelink's Title VI Coordinator at (425) 869-6000 or <u>TitleVI@hopelink.org</u>.

This notice is published in these locations:

Bellevue Center Lobby: 14812 Main St, Bellevue, WA 98007

Redmond Center Lobby: 8990 154th Ave NE, Redmond, WA 98052

If information is needed in another language, contact (425) 869-6000.

Si necesita información en otro idioma, llame al (425) 869-6000.

如果需要其他語言的信息,請致電(425)869-6000.

Nếu cần thông tin bằng ngôn ngữ khác, liên hệ (425) 869-6000.

다른 언어로 정보가 필요하면 (425) 869-6000 으로 연락하십시오.

#### ATTACHMENT B

#### Hopelink Title VI, ADA, and General Complaint Form

hopelink I am filing a: Title VI Complaint

 Section I:

 Name:

 Address:

 Telephone:
 Email:

 Accessible Format Requirements?
 Large Print
 TDD

 Audiotape
 Other:

Section II:			
Are you filing this complaint on your own behalf?	Yes	No	
If yes, skip to Section III			
If no, please supply the name and relationship of the p	person on whose	e behalf you are filing:	
Please explain why you have filed for a third party:			
Have you received permission from the third party to f	ile on their beha	alf? Yes No	

Section III:		TITLE VI ONLY			
I believe the Race		experienced was based National Origin	on (check all that a	pply)	
Date of incid				<u> </u>	
all persons w	ho were involve	possible what happened ed. Include the name and ell as the names and con-	d contact information	n of the person(s) wh	no discriminated

**General Complaint** 

Section IV:	TITLE VI ONLY				
Have you previously filed a complaint with this organization? Yes No					
Section V:	TITLE VI ONLY				
Have you filed this complain	t with any other Federal, State,	or local agency, or v	vith any Federal or State Cou	urt?	
Yes	No				
If yes, please check all that	apply				
Federal Agency:		State Agency:			
Federal Court:		Local Agency:			
State Court:					
Please provide contact information for the agency/court where the complaint was filed.					
Name:		Title:			
Agency:					
Address:					

Telephone:

**Section VI:** 

#### For ADA or General Complaints

Name of person or program this complaint is against:

For non-Title VI complaints, please use the space below to explain the issue/experience:

Signature

Date

Please email this form to <u>*TitleVI@hopelink.org*</u> or mail to: ATTN: Chief Operating Officer Hopelink PO Box 3577 Redmond, WA 98073-3577

#### ATTACHMENT C

#### **Hopelink Public Participation Plan**

The Public Participation Plan (PPP) aims to establish procedures that encourage the full participation of all community members in the Hopelink service area, including but not limited to low-income and minority individuals, and those with limited English proficiency. While traditional means of soliciting public involvement may not reach such individuals or might not allow for meaningful avenues of input, the intent of this effort is to take reasonable actions throughout the planning process to provide opportunities for historically under-served populations to participate.

This document will outline procedures for providing opportunities for all area citizens to participate in the development of short- and long-term plans for Hopelink's services. Where appropriate, Hopelink will make improvements to its public participation plan.

Goals and Objectives for the Public Participation Plan

The goal of the PPP is to offer opportunities for the engagement of all citizens in Hopelink's service area to participate in the development of short- and long-term plans. Our objectives are:

- To determine what non-English languages and other cultural barriers exist to public participation within Hopelink's service area.
- To provide a general notification of meetings, particularly forums for public input, in a manner that is understandable to all populations in the area.
- To hold meetings in locations which are accessible and welcoming to all area residents, including, but not limited to, low-income and minority members of the public.
- To provide avenues for a two-way flow of information and input from populations which are not likely to attend meetings.
- To provide a framework of actions appropriate to various types of plans and programs, as well as amendments or alterations to any such plan or program.
- To use various illustrative visualization techniques to convey the information such as charts, graphs, photos, and maps.

#### Identification of Stakeholders

Stakeholders are those affected, directly or indirectly, by a plan or recommendation of that plan. Those who may be adversely affected, or who may be denied the benefit of a plan's recommendation(s) are of interest in the identification of specific stakeholders. Stakeholders are divided into several groups: general citizens, minority and low-income persons, public agencies, and private organizations and

businesses.

**Community Members:** To engage community members, we perform in-person outreach at public gathering spaces, including senior centers, community centers, medical facilities, libraries, and housing complexes. Our website is also available in seven languages. Staff also administers surveys in multiple languages, conduct focus groups, leverage ethnic media, local media outlets, and social media to encourage participation from the public.

**Public Agencies:** Public agencies provide valuable input to the planning process. Pertinent public agencies include those with clients who fall into under-represented populations such as minorities, low-income and limited English proficiency households. All these agencies have insight into the transportation needs of their clients and are useful partners in overcoming barriers that may not be understood by professionals dealing more directly with the provision of services.

**Private Organizations and Businesses:** Private organizations and businesses offer several perspectives that are valuable to our planning processes. We have extensive contact with service providers who work closely with people with disabilities or older adults who often cross over into those in the low-income, minority and limited English proficiency demographic. One of the most successful ways for Hopelink to participate with private organizations and businesses has been through our mobility coalitions.

In addition to the processes set out in this policy, staff will use the following techniques during its planning studies and stakeholder engagement as deemed appropriate by staff. These include:

- Presentations to professional, citizen, and other organizations
- Articles in community newspapers
- Interviews with local radio stations (both English and Spanish speaking)
- Press releases
- Social media posts
- Interviews with individuals who are or may be affected by proposed plans
- User and non-user surveys
- Focus groups and listening sessions with impacted community groups
- Mobility coalition meetings
- Use of illustrative visualization techniques to convey the information including but not limited to, charts, graphs, photos, maps.

During any planning process, the public is invited to contact Hopelink Mobility Management with comments and to request additional information. Requests can be made via telephone by contacting Hopelink Mobility Management at 425-943-6760 or our website at www.kcmobility.org.

Hopelink Mobility Management partnered with over 150 unique organizations in 2023. Through our outreach events, we connected 12,345 people to transportation resources to help them access various

services, including employment, medical, childcare, and recreation. A sample of who we engage with regularly is below:

#### Hopelink Mobility Management Partnerships

Aging and Disability Services Alliance of People with disAbilities American Cancer Society Asian Counselling and Referral Services AtWork! Auburn Senior Activity Center **Bellevue College** Bellevue Network on Aging **Bright Horizons Redmond** Byrd Barr Place **Capitol Hill Housing** CarePoint Casa Latina **Catholic Community Services** Childhaven **Chinese Information and Service Center** City of Auburn City of Bellevue City of Bothell **City of Carnation** City of Duvall City of Issaquah City of Kent City of Kirkland City of North Bend City of Redmond City of Renton City of Sammamish City of Seattle **City of Shoreline City of Snoqualmie** City of Tukwila Coalition of Inclusive Emergency Planning (CIEP) Community Health Plan of WA **Community Transit Compass Housing Alliance** 

Domestic Abuse Women's Network

DSHS

- **Duwamish Family Safe Streets**
- Eastside Friends of Seniors
- Eastside Legal Assistance Program
- Eastside Neighbors Network
- Encompass (Children's Services of Sno-Valley)
- Fall City Community Association
- Friends of Youth
- Greater Redmond Transportation Management Association
- Harborview Medical Center
- HealthierHere
- HealthPoint
- HERO House
- Hilltop House
- Imagine Housing
- Indian Association of Western Washington
- International Community Health Services
- International Drop In Center
- International Rescue Committee
- Issaquah/Sammamish Nourishing Networks
- Issaquah Valley Senior Center
- Jewish Family Service
- Kaiser Permanente
- King County Housing Authority
- King County Library System
- King County Metro
- King County Office of Emergency Management
- King County Sexual Assault Resource Center
- Kirkland Senior Council
- Lake City Community Center
- Lake Forest Park Citizen's Commission
- Lake Washington Technical College
- Latino Community Fund
- Literacy Source
- LWPTSA Council
- Meridian Center for Health
- Molina Healthcare
- Mt. Si Senior Center
- Muckleshoot Tribe
- Multi-Service Center
- MV Transit

NAMI – Eastside **Neighborhood House** North Seattle Community College North Sound 211 North Urban Human Services Alliance (NUHSA) Northshore Senior Center Northwest Center Northwest Healthcare Response Network **Old Friends Club Open Doors for Multicultural Families** Park Place Assisted Living Peter Kirk Community Center **Pierce County Community Connections** Pike Place Senior Center Port of Seattle **Project Access Northwest Proton Therapy Clinic** Public Health Seattle/King County Puget Sound Educational Service District **Puget Sound Energy** Puget Sound Regional Council **Rainier Foothills Wellness Foundation Rainier Valley Food Bank Red Eagle Soaring Redmond Community Court Redmond Senior Center Refugee NW Refugee Resettlement Office Renton Innovation Zone** ReWA **Riverview School District Ronald Commons** SE Seattle Senior Center SeaMar/Community Living Connections Seattle Central College Seattle Children's Hospital Seattle Department of Neighborhoods Seattle Department of Transportation Seattle Fire Department Seattle Goodwill Seattle Indian Health Board Seattle Public Library

Senior Center of West Seattle SHAG Shoreline Community College Shoreline/LFP Senior Center Snoqualmie Tribe Snoqualmie Valley Alliance Church Snoqualmie Valley Chamber of Commerce Snoqualmie Valley Community Network **Snoqualmie Valley Transportation SNOTRAC Sno-Valley Senior Center** Sophia Way Solid Ground Sound Cities Association Sound Generations Sound Transit South Park Senior Center **Transportation Choices Coalition U-District Food Bank** United Way of King County University of Washington VA Hospital Valley Medical Center Wallingford Community Senior Center Washington State Department of Health Washington State Dept of Transportation (WSDOT) WorkSource World Relief YWCA

#### ATTACHMENT D

#### Racial Breakdown of Hopelink's Board

Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar bodies must provide a table depicting the membership of those committees categorized by race. A description of efforts made to encourage the participation of minorities on such committees must also be provided. The table below summarizes the racial composition of Hopelink's 20-member Board as of June 2019.

Response Category	Percentage
Caucasian	67%
Black or African American	5%
American Indian and/or Alaska Native	0%
Asian	24%
Native Hawaiian and Other Pacific Islander	0%
Other Race	0%
Two or More Races	5%
Hispanic or Latino	10%
No Answer Provided	0.0%
Total	100%

#### Racial/Ethnic Breakdown of Hopelink's Board

Potential Board members may be recommended by the CEO or other Board members and are voted on by majority approval of the Board. It is Hopelink's goal to maintain an inclusive and diverse board. There is a policy in place that the Board is comprised of 1/3 low-income representatives, 1/3 community representatives, and 1/3 elected officials.