



TITLE VI CIVIL RIGHTS

POLICY

(Approved March 2003)

&

PROCEDURES

(Revised and Approved January 2012)

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Section 1: POLICY STATEMENT

Skagit Transit assures that no person shall on the grounds of race, color, national origin, or sex as provided by Title VI of the Civil Rights Act of 1964, and the Civil Rights Restoration Act of 1987 (P.L. 100.259) be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity. Skagit Transit further assures every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs and activities are federally funded or not.

In the event that Skagit Transit distributes federal assistance funds to another governmental entity or contractor, Skagit Transit will include Title VI language in all written agreements and will monitor for compliance.

Skagit Transit assures that:

1. No person on the basis of race, color or national origin will be subjected to discrimination in the level and quality of transportation services and transit-related benefits.
2. Skagit Transit will compile, maintain, and submit in a timely manner Title VI information required by FTA Circular 4702.1A and in compliance with the Department of Transportation's Title VI regulations, 49 CFR Part 21.9.
3. Skagit Transit will make it known to the public that those person or persons alleging discrimination on the basis of race, color, or national origin as it relates to the provision of transportation service and transit-related benefits may file a complaint with the Federal Transit Administration and/or the U.S. Department of Transportation.

The Executive Director for Skagit Transit shall be the Title VI Director and will have the ultimate authority and responsibility for the agency's adherence to the Skagit Transit Title VI Policy. The Title VI Director shall delegate duties to achieve the policy goals as necessary.

The Manager of Finance and Administration shall be delegated as the Title VI Manager. In that capacity, this manager is responsible for managing and implementing all aspects of the Title VI Program. A Title VI Coordinator shall be delegated to perform the administrative, day-to-day functions of the Title VI Program.

Detailed duties functions of all Title VI authorities are outlined in Section 9, Program Administration.

Authorities

Title VI of the 1964 Civil Rights Act provides that no person in the United States shall, on the grounds of race, color, national origin, or sex be excluded from participation in, be denied the benefits of or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance (please refer to 23 CFR 200.9 and CFR 21)

Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of terms "programs or activities" to include all programs or activities of Federal Aid recipients, subrecipients, and contractors, whether such programs and activities are federally assisted or not (P/L. 100-259 [S.557] March 22, 1988).

Federal Circular FTA C 4702.1A details the requirements necessary for compliance and administration of a Title VI program.

Additional Authorities and Citations Include:

Title VI of the Civil Rights Act of 1964, 42 USC 2000d to d000d-4; 42 USC 4601 to 4655; 23 USC 109(h); 23 USC 324; DOT Order 1050.2; EO 12250; EO 12898; 28 CFR 50.3

Dale O'Brien
Executive Director

Date

Section 2: OVERVIEW OF TITLE VI COMPLIANCE

A. General Reporting Requirements (see also Section 3)

Requirements and guidelines for general reporting are contained in Circular 4702.1A – Chapter IV.

Requirements include:

- Report must be received and approved by the FTA prior to the approval of any grant application or, at minimum; it must be updated once every three years.
- Signed Civil Rights and standard DOT Title VI Assurances.
- List of any active lawsuits or complaints which allege discrimination.
- Description of all pending and current federal financial assistance.
- Summary of all civil rights compliance review activities conducted by the FTA.
- Special requirements for federally funded construction projects.
- Information on changes in service features which effect minority communities and transit users.
- Description of methods used to inform minority communities of service changes.

B. Public Information Requirements (see also Section 4)

Skagit Transit is required to ensure that the public and any interested party is informed of our Title VI obligations. Skagit Transit must display posters and inform the public in languages other than English if necessary.

C. Complaints of Discrimination Procedure (see also Section 5)

Requirements and guidelines for operating a complaints procedure is contained in Circular C 4702.1A – Chapter IX.

Procedure will:

- Inform the public as to Skagit Transit's Title VI obligations.
- Inform the public how to enter a complaint of discrimination.
- Implement and maintain a procedure for receiving, administering, investigating and resolving complaints.

D. Record Keeping Requirements (see also Section 6)

Records must be maintained in all areas of the Title VI program. Documents must be available for compliance review audits.

E. Compliance Reviews/Audits (see also Section 7)

After a grant has been awarded, FTA may conduct reviews as part of its ongoing monitoring responsibilities, pursuant to its authority under 49 CFR Section 21.11(a). These reviews exist

separate and may be in addition to the Triennial Review, State Management Review, or Planning Certification Review and will be conducted either as a desk audit or at an on-site visit. They may cover all or a portion of the recipient's compliance with the requirements of this circular. Such reviews are conducted at the discretion of FTA, and their scope is defined on a case-by-case basis.

F. Remedial Actions and Enforcement Procedures (see also Section 8)

Remedial actions are necessary when it is found (by an FTA audit or internally through complaint or other procedures) that Skagit Transit is noncompliant with Title VI provisions. Failure to take action may result in the suspension or termination of Skagit Transit's existing federal financial assistance or refusal by FTA to grant additional assistance.

Section 3: GENERAL REPORTING REQUIREMENTS

(C-4702.1A, Chapter IV)

At least once every three years, Skagit Transit must submit a Title VI Program report to FTA. It will include:

- 1) A summary of public outreach and involvement activities undertaken since the last submission and a description of steps taken to ensure that minority and low-income people had meaningful access to these activities.
- 2) A copy of the agency's plan for providing language assistance for persons with limited English proficiency that was based on the DOT LEP Guidance or a copy of the agency's alternative framework for providing language assistance.
- 3) A copy of the agency procedures for tracking and investigating Title VI complaints.
- 4) A list of any Title VI investigations, complaints, or lawsuits filed with the agency since the time of the last submission. This list should include only those investigations, complaints, or lawsuits that pertain to the agency submitting the report, not necessarily the larger agency or department of which the entity is a part.
- 5) A copy of the agency's notice to the public that it complies with Title VI and instructions to the public on how to file a discrimination complaint.

Section 4: PUBLIC INFORMATION REQUIREMENTS

(C 4702.1A, Chapter IV)

Skagit Transit will disseminate Title VI Program information to Skagit Transit employees, contractors, subcontractors, and beneficiaries as well as the general public. Public dissemination will include the posting of public statements, inclusion of Title VI language in contracts, on the Skagit Transit Web Site, poster in buses and in the Rider Guides.

- 1) Triennial reports sent to FTA, Skagit Transit's Title VI Policy and any other related information will be available to the public upon request.

- 2) Posters shall be displayed which include at least the following:
 - That Skagit Transit operates programs that are subject to the nondiscrimination requirements under Title VI;
 - A summary of the requirements under Title VI;
 - An explanation that Title VI information is available from Skagit Transit;
 - A brief explanation regarding the procedures for filing a complaint.
 - References to other publications containing Title VI information.
- 3) More detailed information regarding complaint procedures and Title VI civil rights will be included in handbooks, pamphlets, and other materials ordinarily distributed to the public by Skagit Transit.

Section 5: COMPLAINTS OF DISCRIMINATION PROCEDURE

(C 4702.1A Chapter IX)

These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Civil Rights Restoration Act of 1987, and the Americans with Disabilities Act of 1990, relating to any program or activity administered by Skagit Transit as to consultants, and contractors. Intimidation or retaliation of any kind is prohibited by law. The procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies or to seek private counsel for complaints alleging discrimination. Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation meeting(s) between the affected parties and the Title VI Coordinator may be utilized for resolution.

Complaint Procedure

1. Any individual, group of individuals or entity that believes they have been subjected to discrimination prohibited by nondiscrimination requirements may file a complaint with Skagit Transit. A formal complaint must be filed within one hundred and eighty (180) days of the alleged occurrence.
2. In cases where the complainant is unable or incapable of providing a written statement, a verbal complaint may be made. The Title VI Coordinator will interview the complainant and if necessary assist the person in converting verbal complaints to writing. All complaints must, however, be signed by the complainant or his/her representative.
3. Complaints shall state, as fully as possible, the facts and circumstances surrounding the alleged discrimination.
4. Skagit Transit will provide the complainant or his/her representative and any contractor (respondent) with a written acknowledgement that Skagit Transit has received the complaint within five (5) working days of receipt.
5. A copy of the complaint will be forwarded to Skagit Transit's legal counsel for review.

6. The Executive Director will assign an Investigator to the complaint (this may be the Title VI Coordinator or other designated staff).
7. The Investigator will determine if the complaint has investigative merit:
 - a. It was received within 180 days of the alleged occurrence.
 - b. It does not appear to be frivolous or trivial.
 - c. It involves Skagit Transit or Skagit Transit contractors and not another entity.
 - d. A complaint against a contractor involves a Skagit Transit federally funded contract.
8. The complainant and contractor, or other party to the complaint, will be notified of the status of the complaint within ten (10) days of receipt of the complaint, by registered mail that:
 - a. The complaint will not be investigated and the reasons why the complaint does not have investigative merit.
 - b. The complaint will be investigated and a request for additional information needed to assist the Investigator.
9. The complainant or contractor must submit the requested information within sixty (60) working days from the date of the original request. Failure of the complainant to submit additional information within the designated timeframe may be considered good cause for a determination of no investigative merit. Failure of the contractor to submit additional information within the designated timeframe may be considered good cause for a determination of noncompliance under the contract.
10. The internal Investigator and/or contractor must, within fifteen (15) working days, supply the Executive Director with status report of their investigation and/or resolution of the complaint.
11. Within sixty (60) working days of the receipt of the complaint, the Investigator will prepare a written report for the Executive Director that shall include:
 - a. A narrative description of the incident, including persons or entities involved.
 - b. A statement of the issues raised by the complainant and the respondent's reply to each of the allegations.
 - c. Citations of relevant federal, State and local laws, Skagit Transit policy, etc.
 - d. Description of the investigation, including list of the persons contacted and summary of the interviews conducted.
 - e. A statement of the Investigator's finding and recommendations for disposition.
12. The investigative report and findings of the complaint will be sent to legal counsel for review.
13. The Executive Director shall, based on the information before him or her and in consult with legal counsel, make a determination on the disposition of the complaint. Determination shall be made within 10 days from Executive Director's receipt of the investigator's report. Examples of disposition are as follows:
 - a. Complainant is found to have been discriminated against. Skagit Transit or Contractor is therefore in noncompliance with Title VI regulations. Reasons for the determination will be

listed. Remedial actions that Skagit Transit or the Contractor must take will be listed (see also Section 10).

b. Complaint is found to be without merit. Reasons why will be listed.

14. Notice of the Executive Director's determination will be mailed to the complainant and contractor. Notice shall include information regarding appeal rights of complainant and instructions for initiating such an appeal. Example of a notice of appeal follows:

a. Skagit Transit will only reconsider this determination, if new facts, not previously considered, come to light.

b. If the complainant is dissatisfied with the determination and/or resolution set forth by the same complaint may be submitted to the Federal Transit Administration (FTA) for investigation. For more information, please contact the Federal Transit Administration, Office of Civil Rights, 915 Second Avenue, Suite 3142 – Seattle, WA 98174-1002 / (206) 220-7954.

15. A copy of the complaint and Skagit Transit's investigation report/letter of finding and Final Remedial Action Plan will be issued to the FTA within ninety (90) days of the receipt of the complaint.

16. After receiving the FTA's comments, out briefings may be scheduled with all relevant parties to the complaint.

17. A summary of the complaint and its resolution must be included in the annual report to the FTA.

Section 6: RECORD KEEPING REQUIREMENTS

The Title VI manager shall ensure that all records relating to Skagit Transit's compliance to Title VI are maintained for a minimum of seven (7) years.

Records must be available for compliance review audits.

Copies of the following material will be kept available by the Title VI Coordinator for dissemination to the public upon demand:

- Skagit Transit's Title VI policy.
- Triennial reports to FTA.
- Audit report findings and recommendations.
- Summaries of actions taken by Skagit Transit to remedy audit findings.
- Complaints received and a summary of their disposition.
- Annual report to Executive Director regarding Title VI compliance.
- Final report of level and quality of service to minority areas as compared to non-minority areas.

Section 7: COMPLIANCE REVIEWS / AUDITS

(C 4702.1A, Chapter VIII)

After a grant has been awarded, FTA may conduct reviews as part of its ongoing monitoring responsibilities, pursuant to its authority under 49 CFR Section 21.11(a). These reviews exist separate and may be in addition to the Triennial Review, State Management Review, or Planning Certification Review and will be conducted either as a desk audit or at an on-site visit. They may cover all or a portion of Skagit Transit's compliance with the requirements of this circular. Such reviews are conducted at the discretion of FTA, and their scope is defined on a case-by-case basis.

Section 8: REMEDIAL ACTIONS AND ENFORCEMENT PROCEDURES

(C 4702.1A – Chapter VIII)

Remedial actions are necessary when it is found that Skagit Transit is in noncompliance with Title VI. Note: When a Skagit Transit federally funded Contractor found to be in noncompliance with Title VI, this means that Skagit Transit itself is not in compliance. Non-compliance may be found by FTA audit, internal Skagit Transit complaint procedure, or any other means.

DETERMINATIONS. After reviewing Skagit Transit's or a sub recipient's efforts to meet the general reporting and program-specific reporting sections of the circular, FTA will issue findings of no deficiency, deficiency or noncompliance.

- a. **Findings of no deficiency** are determinations that no deficiency was found in review of Skagit Transit's or sub recipient's Title VI program or after the results of an investigation or compliance review. Skagit Transit is not expected to take any corrective action in response to findings of no deficiency except with regard to advisory comments. Advisory comments are recommendations that Skagit Transit or sub recipient undertake activities in a manner more consistent with the guidance provided in the pertaining section of the circular. Skagit Transit and sub recipients are expected to notify FTA as to whether they will take action in response to the advisory comments.
- b. **Findings of deficiency** are determinations that Skagit Transit or the sub recipient has not complied with one or more of the pertinent provisions of this circular. Skagit Transit and subrecipients are expected to take corrective actions in response to findings of deficiency and the compliance review will provide specific instructions to the recipient on how the corrective action should be taken.
- c. **Findings of noncompliance** are determinations that the Skagit Transit or the sub recipient has engaged in activities that have had the purpose or effect of denying persons the benefits of, excluding them from participation in, or subjecting persons to discrimination on the basis of race, color, or national origin under the recipient's program or activity, FTA will consider the grantee to be non-compliant with the DOT Title VI regulations. If noncompliance cannot be corrected informally, Skagit Transit or the sub-recipient may be subject to remedial action or proceedings under Chapter X of this circular and the DOT Title VI regulations at 49 CFR Sections 21.13, 21.15, and 21.17.

RESULTS OF COMPLIANCE REVIEW ACTIVITIES. FTA will summarize the results of the review in a draft report, which will include findings of no deficiency, findings of deficiency and advisory comments, as appropriate. Skagit Transit or the sub-recipient will have the opportunity to review and respond to the draft report. After FTA has received and reviewed the agency's response, it will publish a final report that will be provided to Skagit Transit or the sub-recipient and will also be subject to requests from the public under the Freedom of Information Act (FOIA). If findings of deficiency remain in the final report, Skagit Transit or the sub-recipient will be required to take corrective action, develop a timeline for compliance, and report on its progress to FTA on a quarterly basis. Once FTA determines that Skagit Transit or the sub-recipient has satisfactorily responded to the review's findings, it will inform Skagit Transit that the review process has ended and release it from further progress reporting in response to the review. Compliance reviews may be followed up with additional reviews as necessary.

EFFECTING COMPLIANCE. Consistent with the provisions in Chapter X of C4702.1A, if the recipient or sub-recipient fails to take appropriate corrective action in response to the findings of deficiency in the report, FTA may initiate Effecting Compliance proceedings that could result in action taken by Department of Transportation (DOT) to suspend, terminate, refuse to grant or continue Federal financial assistance to a recipient or sub-recipient or a referral to the Department of Justice (DOJ) with a recommendation that appropriate proceedings be brought to enforce any rights of the United States under any law of the United States or any assurance or other contractual undertaking.

Contractor Compliance Enforcement

Skagit Transit will follow a similar procedure as described above to bring non-compliant contractors into compliance.

- Clauses (including termination for noncompliance with Title VI) and notices will be included in all bid packages and signed certifications will be required of contractors in all Skagit Transit contracts awarded with federal assistance.
- When it is found through FTA audit or other Skagit Transit internal procedure that a contractor is performing work under the contract that is in noncompliance with Title VI, the contractor shall be given a written Letter of Finding which details the noncompliance issues.
- Within thirty (30) days of the contractor's receipt of Letter of Finding, the contractor (in consult with Skagit Transit) shall develop a Remedial Action Plan to correct the deficiencies.
- Skagit Transit will agree or disagree with the contractors Remedial Action Plan and within thirty (30) days from receipt shall send the contractor a Final Remedial Action Plan.
- The contractor must, within fifteen (15) days from receipt of the Final Plan, either agree with the Plan and submit to Skagit Transit a written confirmation that the actions contained in the Plan shall be carried out, or it will disagree with the Plan and provide written reasons why.
- Within thirty (30) days of Skagit Transit's receipt of the contractor's disagreement with the Final Plan, a mutually agreeable Final Plan must be in place or Skagit Transit must seek to terminate the contractor's contract according to the noncompliance clauses set forth in the contract.

- When a contractor fails or refuses to voluntarily comply with requirements within the time frame allotted, and the FTA has not already determined the contractor to be in noncompliance, Skagit Transit will submit to the FTA two copies of the case file and a recommendation that the contractor be found in noncompliance.
- A finding of noncompliance and a refusal to voluntarily take steps necessary to correct the deficiencies; will be grounds for termination of the contractor's contract.

Skagit Transit will seek the cooperation of the contractors in correcting deficiencies found. Skagit Transit will also provide the technical assistance and guidance needed to aid the contractors to comply voluntarily. A follow-up review will be conducted within one hundred and eighty (180) days of the initial review to ensure that the contractor has complied with the Title VI Program requirements in correcting deficiencies previously identified.

Section 9: PROGRAM ADMINISTRATION

I. Title VI Director Duties:

- a. The Executive Director shall also be the Title VI Director.
- b. The Title VI Director shall have the final authority and responsibility for compliance with Title VI provisions.
- c. The Title VI Director may delegate to the Manager of Finance and Administration the responsibility for coordinating the overall administration of the Title VI Program.

II. Title VI Manager Duties:

- a. The Manager of Finance and Administration shall also be the Title VI Manager.
- b. Appoint and supervise a Title VI Coordinator who is charged with the responsibility of implementing, monitoring, and ensuring Skagit Transit's compliance with Title VI regulations in the day-to-day administration and annual reporting requirements of Skagit Transit's Title VI Program.
- c. Ensure that all department managers are aware of Title VI requirements.
- d. Develop long range plans with Skagit Transit's MPO that are consistent with Title VI requirements.
- e. Assist the Title VI Coordinator in gathering and organizing the Planning Office section of the Annual Title VI update report.

III. Title VI Coordinator Duties:

- a. Gather information necessary for general reporting requirements and report to the FTA.
- b. Process, record and disseminate Title VI complaints received by Skagit Transit.
- c. Monitor and ensure public information is available for Skagit Transit's Title VI Program.
- d. Develop Title VI information for dissemination to the general public and, where appropriate, in languages other than English.

- e. Develop and disseminate public information posters and other item as necessary.
- f. Conduct surveys and other events to determine perceived quality of transit service in minority communities. Analyze to determine if quality of service is consistent among different user groups and the degree to which the service is responsive to minority needs.
- g. Determine areas of concern in transit service operations and assist Operations Department with remedies.
- h. Conduct annual reviews and update statistical information.
- i. Conduct Title VI reviews of consultant contractors, suppliers, and other recipients of federal assistance.
- j. Review program directives and, where applicable, include Title VI and related requirements.
- k. Conduct training programs on Title VI and related statutes for Skagit Transit employees.
- l. Prepare a yearly report of Title VI accomplishments for the past year and goals for the next year.
- m. Identify and propose ways to eliminate discrimination when found to exist.
- n. Establish procedures for promptly resolving deficiency status and reducing to writing the remedial action agreed to be necessary, all within a period not to exceed ninety (90) days.

Section 10: PROGRAM ESSENTIALS

Program Review

A review of the major components of the Title VI Program will be reviewed annually. This review will be in addition to day-to-day monitoring of the Program.

a. Internal Review will include:

- Remedial action taken on any compliance audit findings and their results.
- Frequency and effectiveness of training.
- Frequency and effectiveness of the display of Title VI public notices, posters, bid documents etc.
- Frequency of multilingual public notices & customer service.
- Frequency of complaints and effectiveness of complaint procedure.

b. Contractor Review will include:

- Continuation of original compliance to Title VI provisions.
- Operational guidelines will be reviewed to assure effectiveness in their compliance of Title VI provisions.
- Frequency of complaints.
- Changes in work flow or operations which may require additional attention or new provisions.
- Frequency of and effectiveness of training.
- Utilization of DBE subcontractors.

c. Remedial Action (see also Section 8)

It is the goal of Skagit Transit to eliminate discrimination. The annual program review is implemented to identify and eliminate discrimination when found to exist. Skagit Transit will actively pursue the prevention of Title VI deficiencies and violations and will take the necessary steps to ensure compliance with all program administrative requirements.

When irregularities occur in the internal administration of the program's operation, procedures will be promptly implemented to resolve Title VI issues. A written remedial action will be implemented within a period not to exceed ninety (90) days.

Annual Report

An annual report to the Executive Director will be produced following the annual program review. This report will include the following:

- Summary of Title VI annual accomplishments.
- Summary of Training frequency and effectiveness.
- Summary of the results from the program review.
- Analysis of Skagit Transit's current compliance with Title VI.
- Letters of finding or report detailing any found areas of noncompliance.
- Recommendations for policy changes or action.

General Reporting to FTA

As outlined in Section 3, Skagit Transit will be required to submit annual reports. The information obtained from the program monitoring, program review and annual report will be used to accomplish this requirement. Any changes to the policy approved by the Executive Director will be included in the report.

Section 11: EDUCATION AND TRAINING

Training will be conducted at least annually. A summary of training conducted, issues detected and processes employed will be included in the annual report to the Executive Director.

Internal Staff: Training will at minimum be given to all Skagit Transit managers, project administrators and supervisors. Training will include:

- a. Requirements of Title VI.
- b. Skagit Transit's obligations under Title VI.
- c. Required data that must be gathered, analyzed and maintained.
- d. Annual Summary of Title VI review to Executive Director.
- e. Findings and recommendations from FTA compliance reviews.
- f. Summary of Complaint procedures.

Contractors: Training is available to contractors upon request. Contractors found to be in non-compliance may be required to attend such training as part of the remedy of the situation. Training will include:

- a. Standard Title VI notices and information in bid packages and resulting contracts.
- b. Comprehensive review of Title VI provisions.
- c. Contractor's obligations under Title VI and its application to the work necessary under the contract.
- d. Contractor's obligations when subcontracting work.
- e. Required data that must be gathered and maintained.
- f. Procedures to become Title VI complaint.
- g. Processes for identifying Title VI issues and resolution of complaints.