



## Title VI Plan

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**Policy Number:** 0003

**Effective Date:** June 16, 2023

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## I. 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.

Snotrac 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.A

## II. Title VI Complaint Procedures

The Snohomish County Transportation Coalition (Snotrac) is committed to ensuring that no person is excluded from participation in, or denied the benefits of its mobility management services on the basis of 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 Snotrac which may be completed for this purpose (Attachment B).

**The complaint may also be filed in writing with Snotrac at the following address:**

In-Person:  
Snotrac, Title VI Coordinator  
3201 Smith Ave, Ste 411  
Everett, WA 98201

By Mail:  
Snotrac, Title VI Coordinator  
3201 Smith Ave, Ste 215  
Everett, WA 98201

*NOTE: Snotrac 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.*

### What happens to your complaint after it is submitted to Snotrac?

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

In instances where additional information is needed for investigation of the complaint, Snotrac will contact the complainant in writing. Please note that in responding to any 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 Snotrac, a written response will be drafted subject to review by the transit's attorney. If appropriate, Snotrac's attorney may administratively close the complaint. In this case, Snotrac will notify the complainant of the action as soon as possible.

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

Snotrac will send a final written response to the complainant and advise the complainant of his or her right to 1) appeal within 7 calendar days of receipt of the final written decision from Snotrac, 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.

In addition to the complaint process described above, a complainant may file a Title VI complaint with the following offices:

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

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

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

### **IV. Limited English Proficiency (LEP) Plan**

Snotrac 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 denials of services. These individuals may be entitled to language assistance with respect to a particular type of service. The federal government and those receiving assistance from the federal government must take reasonable steps to ensure that LEP persons have meaningful access to the programs, services, and information those entities provide.

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

According to the 2017-2021 American Communities Survey (ACS), 8.5% of individuals are non-English speaking. The following represents the percentage of individuals who are non-English speaking, broken down by language spoken at home (ACS 2011-15):

| Language          | %     |
|-------------------|-------|
| Spanish           | 6.23% |
| Korean            | 0.87% |
| Vietnamese        | 0.78% |
| Chinese           | 0.65% |
| Russian           | 0.47% |
| Tagalog           | 0.41% |
| African Languages | 0.24% |

## ANALYSIS OF FACTORS

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

Snotrac jurisdiction covers all of Snohomish County, which is largely English speaking. The vast majority of the population with which we do business (individuals wishing to ride transit) speak English, though we strive to serve community members who speak English less than very well.

| Language Spoken at Home | Total Number | Percentage |
|-------------------------|--------------|------------|
| Speak only English      | 565,114      | 80.79%     |
| Speak other Language    |              | 19.21%     |
| Spanish                 | 43,783       | 6.26%      |
| Korean                  | 10,133       | 1.45%      |
| Vietnamese              | 9,299        | 1.33%      |
| Chinese                 | 8,720        | 1.25%      |
| Tagalog                 | 8,052        | 1.15%      |
| Russian                 | 6,978        | 1.00%      |
| African Languages       | 5,939        | 0.85%      |
| Arabic                  | 2,983        | 0.43%      |
| Mon-Khmer               | 2,948        | 0.42%      |
| <b>Total:</b>           |              |            |

In Snohomish County, 62,456 people (8%) are non-English speaking; that is, they speak English less than

“very well”. In Snohomish County, of those persons with limited English proficiency, about 46% speak Asian and Pacific Island languages, 27% speak Spanish, 21% speak other Indo-European languages, and 6% speak other languages.

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

All contacts with Snotrac are made through in-person, phone, or electronic engagements. We may serve LEP persons via a variety of mobility management programming. However, from 2019 to 2022, Snotrac Mobility Management has provided no direct services to LEP clients or persons. Snotrac has administered community surveys that were translated into Spanish; none of these surveys were completed.

**Factor No. 3: The nature and importance of service provided by Snotrac.**

Snotrac engages the public in conversations about mobility issues and conducts community needs assessments. Snotrac does not typically provide direct services to members of the public, but the LEP individuals may miss out on opportunities to influence public policy or the delivery of other agencies’ services if they are not able to participate in Snotrac activities.

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

Snotrac works to employ a workforce that supports the diversity of our clientele.

**Interpretation Services**

Nearly all Snotrac Mobility Management meetings are held online. Captioning and translation services would be made available for persons who provide notice of translation service needs.

**Outreach & Program Materials**

Snotrac has translated surveys and informational fliers into multiple languages, including Spanish, Chinese, Russian, and Tagalog.

## **V. Implementation Plan**

Snotrac will implement 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 actively partnering with community-based organizations that serve LEP populations, including resettlement agencies, social service organizations, and immigrant advocacy agencies. Mobility Management fliers and outreach materials are translated into the core languages when public outreach is conducted, especially in local geographies known for higher proportions of LEP persons. Snotrac’s Title VI policy and a Complaint Form are available on our website. All Mobility Management print materials, agendas, and newsletters will contain our Title VI policy. Additionally, staff are trained on how the Title VI plan works so that they are consistent in their application.

In order to comply with 49 CFR 21.9(d), Snotrac 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. Snotrac has established a statement of rights and a policy statement.

## **VI. 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.

## **VII. Analysis of Construction Projects**

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

## **VIII. Inclusive Public Participation**

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

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

Snotrac Mobility Management hosts regular mobility coalition meetings across Snohomish County, with over 100 unique organizations participating in 2022. From time-to-time, we may 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 engagement, including posting on social media, our website, and e-newsletters.

**ATTACHMENT A**  
**Snotrac 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. Snotrac 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 Snotrac's Title VI Coordinator. For additional information regarding Title VI complaint procedures and/or information regarding our non-discrimination obligations, please contact Snotrac's Title VI Coordinator at (425) 780-6052 or [info@gosnotrac.org](mailto:info@gosnotrac.org).*

If information is needed in another language, contact (425) 780-6052.

Si necesita información en otro idioma, llame al (425) 780-6052.

如果需要其他語言的信息，請致電 (425) 780-6052.

Nếu cần thông tin bằng ngôn ngữ khác, liên hệ (425) 780-6052.

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

**Attachment B**  
**Snotrac Title VI, ADA, and General Complaint Form**

Nature of Complaint:  ADA  Title IV  General

**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 person on whose behalf you are filing:

Please explain why you have filed for a third party:

Have you received permission from the third party to file on their behalf?  Yes  No

**Section III: TITLE VI ONLY**

I believe the discrimination I experienced was based on (check all that apply):

Race

Color

National Origin

Date of incident:

Please explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as the names and contact information for any witnesses (if known).

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

**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 complaint with any other Federal, State, or local agency, or with any Federal or State Court?  
 Yes  No

If yes, please check all that apply

- Federal Agency     State Agency     Local Agency
- Federal Court     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:

Please email this form to [info@gosnotrac.org](mailto:info@gosnotrac.org) or mail to:

ATTN: Executive Director  
Snotrac  
3201 Smith Ave, Ste 215  
Everett, WA 98201

## ATTACHMENT C

### Snotrac Public Participation Plan

#### **Purpose**

The purpose of this Public Participation Plan (PPP) is to establish procedures that encourage the full participation of all community members in the Snotrac 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 lay out procedures to provide opportunities for all area citizens to participate in the development of short- and long-term plans for Snotrac's services. Where appropriate, Snotrac 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 of Snotrac's service area to participate in the development of short- and long-term plans. In support of this goal, our objectives are:

- To determine what non-English languages and other cultural barriers exist to public participation within Snotrac'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 reasonably 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 including but not limited to charts, graphs, photos, and maps.

#### **Identification of Stakeholders**

Stakeholders are those who are either directly, or indirectly, affected by a plan, or the recommendations 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 broken down into several groups: general citizens, minority and low income persons, public agencies, and private organizations and businesses.

**Community Members:** Snotrac serves all of Snohomish County, Washington. In Snohomish County, 62,456 people (8%) are non-English speaking; that is, they speak English less than "very well". Of those persons with limited English proficiency, about 46% speak Asian and Pacific Island languages, 27% speak Spanish, 21% speak other Indo-European languages, and 6% speak other languages.

In order to engage community members, we perform in-person outreach at public gathering spaces, including senior centers, community centers, medical facilities, libraries, and housing complexes. Staff administers surveys in multiple languages and leverages ethnic media and social media to encourage participation from the non-English-speaking public.

**Public Agencies:** Public agencies can provide valuable input to the planning process. Pertinent public agencies include those that have clients who fall into under-represented populations, including but not limited to 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 a number of 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 times cross over into those in the low-income, minority and limited English proficiency demographic. One of the most successful ways for Snotrac 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. This includes:

- 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 Snotrac Mobility Management with comments and/or to request additional information. Requests can be made via telephone by contact Snotrac Mobility Management at 425-780-6052 or by contacting us through our website at [www.gosnotrac.org](http://www.gosnotrac.org).

Snotrac Mobility Management partnered with over 200 unique agencies, organizations, and entities from 2019 to 2023. A sample of who we engage with regularly follows:

AARP Washington  
AcutanzaSTS  
AGC Biologics Bothell  
Alta Planning  
American Cancer Society  
Anest Adult Family Home  
Arc of Snohomish County  
Arlington Resource Center

AtWork!  
B.I.K.E.S. Club of Snohomish  
Bethany at Silver Lake  
Better Environmentally Sound Transportation (BEST)  
BIKES Club of Snohomish County  
Boeing  
Boys & Girls Club - Monroe  
Bridgeways

Brookdale Monroe Senior Living Solutions  
C. Hoki Design LLC  
Camano Center  
Camelot Society  
Camp Fire Snohomish County  
Cascade Bicycle Club  
Catholic Community Services of Western  
Washington  
Center for Independence  
Citrine Health  
City of Arlington  
City of Bothell  
City of Bothell  
City of Brier  
City of Darrington  
City of Edmonds  
City of Everett  
City of Everett  
City of Gold Bar  
City of Granite Falls  
City of Issaquah  
City of Lake Stevens  
City of Lynnwood  
City of Marysville  
City of Mill Creek  
City of Monroe  
City of Mountlake Terrace  
City of Mukilteo  
City of Seattle  
City of Shoreline  
City of Snohomish  
City of Stanwood  
City of Sultan  
ComEngage  
Community & Family Services Foundation  
Community Foundation of Snohomish County  
Community Resource Center of Stanwood-Camano  
Community Transit  
Commute Seattle  
Congressional Office  
Connect Casino Road  
CTAA  
CTANW  
Darrington Clinic  
Darrington Family Outreach  
Darrington Fire  
Darrington Food Bank  
Darrington Forest Ranger District

Darrington School District  
Disability Rights Washington  
Downtown Everett Association  
DSHS  
Eagle Wings disAbility Ministry  
Early Childhood Mobility Coalition  
Eastrail Coalition  
Economic Alliance Snohomish County  
Edmonds Bicycle Advisory Group  
Edmonds Parks Director  
Everett Bike Walk  
Everett Community College  
Everett Herald  
Everett Housing Authority  
Everett School District  
Everett Station District Alliance  
Everett Transit  
Everett Transitional Care Services  
EvergreenHealth Monroe Foundation  
ForeverGreen Trails  
Forterra  
Front & Centered  
Full Life Care  
Glacier Peak Institute  
Granite Falls Community Coalition and Food Bank  
Hampton Lumber  
Hoff Foundation  
Homage Senior Services  
Hopelink  
HopeWorks  
Housing Consortium of Everett & Snohomish County  
Housing Hope  
Huitt-Zollars, Inc.  
IBEW Local 191  
Island County  
Island RTPO  
Island Transit  
Josephine Caring Community  
Kaiser Permanente  
King County  
King County Metro  
King County Mobility Coalition  
Kitsap County Non-Motorized Committee  
Kitsap Public Health District  
Lake Forest Park Citizen's Commission  
Lake Stevens Community Resource Center  
Lake Stevens Senior Center  
Lakewood School District

Lane Transit District  
 Leafline Trail Coalition  
 Lee Associates  
 Lincoln Hill Retirement Community  
 Lutheran Community Services  
 Lyft  
 Medstar Transportation  
 Modaxo Americas  
 Monroe Community Senior Center  
 Monroe Gospel Women's Mission  
 Monroe Police and Fire  
 Move Redmonds  
 Navy Federal Credit Union  
 Nelson\Nygaard  
 North Counties Communities Collaborative  
 North Counties' Family Services  
 North County Fire EMS  
 North King County Mobility Coalition  
 North Sound Transportation Alliance  
 North Urban Human Services Alliance  
 Northshore Senior Center  
 Northwest ADA Center  
 NW Research Group LLC  
 Outdoors For All  
 Parametrix  
 Partner Therapeutics  
 People First and Allies in Advocacy  
 Perteet, Inc  
 Phoenix Strategies  
 Pierce County  
 Pierce County Coordinated Transportation Coalition  
 Pierce County Human Services  
 Providence Hospital  
 PRR  
 PSRC  
 Public Health Seattle/King County  
 Red Cross  
 Resilience Collaborative NW  
 Rolland Associates  
 Sauk-Suiattle Tribe  
 Schetky Bus and Van Sales  
 Seagan Inc.  
 SeaMar  
 Seashore Transportation Forum  
 Seattle CityClub  
 Seattle Department of Transportation  
 Sequoia High School (Everett)  
 SHAG  
 Sharing Wheels Community Bike Shop  
 Sherwood Community Services  
 Shockey Planning Group, Inc.  
 Skagit Transit  
 Skagit Transit Community Advisory Committee  
 Snokey Point Behavioral Hospital  
 Sno-Isle Libraries  
 Snohomish City Council  
 Snohomish County 911  
 Snohomish County Committee for Improved  
 Transportation  
 Snohomish County Council  
 Snohomish County Department of Health  
 Snohomish County Emergency Management  
 Snohomish County Executive  
 Snohomish County Human Services  
 Snohomish County Parks  
 Snohomish County Public Works  
 Snohomish PUD  
 Snohomish School District #201  
 Snohomish Senior Center  
 Snoqualmie Valley Transportation  
 Snotrac  
 Sound Communities  
 Sound Generations  
 Sound Transit  
 Stanwood School District  
 Stanwood Schools  
 State Legislators  
 Stillaguamish Senior Center  
 Stillaguamish Tribe of Indians  
 Stilly Valley Health Connections  
 Streamkeepers  
 Sunrise of Edmonds  
 SUNY Buffalo IDEA Center  
 Tacoma Downtown on The Go  
 Thurston Regional Planning  
 Toole Design Group  
 Town of Darrington  
 Town of Skykomish  
 Trails Coalition of Snohomish County  
 TransDev  
 Transit Riders Union  
 Transpo Group  
 Transportation Choices Coalition  
 Transportation Solutions, Inc.  
 Tulalip Tribes  
 United Way of Snohomish County

United Way Snohomish County  
USFS Darrington District  
Valley Industry and Commerce Association  
Verdant Health Commission  
Village Community Services  
Vineyard Park at Mountlake Terrace  
Volunteers of America of Western Washington  
Wahkiakum On the Move  
Washington Area Bicyclist Association  
Washington State Department of Health  
Washington Trails Association

West Sound Cycling Club  
Whatcom Council of Governments  
Whatcom Transportation Authority  
Workforce Snohomish  
World Relief  
WSDOT  
WSP-USA, Inc  
WSU Everett  
YMCA of King & Snohomish County  
YWCA of Snohomish County

**ATTACHMENT D**  
**Racial Breakdown of Snotrac’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 broken down 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 Snotrac’s 11-member Board as of June 2023.

**Racial/Ethnic Breakdown of Snotrac’s Board**

| <b>Response Category</b>                   | <b>Percentage</b> |
|--|-------------------|
| Caucasian                                  | 100%              |
| Black or African American                  | 0%                |
| American Indian and/or Alaska Native       | 0%                |
| Asian                                      | 0%                |
| Native Hawaiian and Other Pacific Islander | 0%                |
| Some Other Race                            | 0%                |
| Two or More Races                          | 0%                |
| Hispanic or Latino                         | 0%                |
| No Answer Provided                         | 0%                |
| <b>Total</b>                               | <b>100%</b>       |

Board membership is primarily determined by representation from key partner organizations, and their representation is determined by those organizations. Additional potential Board members may be recommended by the Executive Director or other Board members and are voted on by majority approval of the Board. It is Snotrac’s goal to maintain an inclusive and diverse board and we will work to increase our board’s diversity over the next two years.