



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

July 1, 2019 to June 30, 2021

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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.

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.A

II. 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 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 Hopelink which may be completed for this purpose (Attachment B).

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

Hopelink, Title VI Coordinator
PO Box 3577
Redmond, WA 98073-3577

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.

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

All complaints alleging discrimination based on race, color or national origin in a service or benefit provided by Hopelink will be directly addressed 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 in an expeditious and thorough manner.

In instances where additional information is needed for investigation of the complaint, Hopelink 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 Hopelink, a written response will be drafted subject to review by the transit'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 his or her right to 1) appeal within 7 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.

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, 5th 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

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

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 are 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	1,499,312	70.54%
Speak other Language	626,071	29.46%
Spanish or Spanish Creole	154,437	7.27%
Chinese	99,096	4.66%
Vietnamese	41,373	1.95%
Amharic, Somali, or other Afro-Asiatic languages	35,080	1.65%
Hindi	26,836	1.26%
Tagalog	24,734	1.16%
Korean	24,099	1.13%
Russian	18,653	0.88%
Telegu	13,402	0.63%
Japanese	10,048	0.47%
Total:	2,125,383	100.00%

In King County, 214,094 people (10.5%) have limited English proficiency; that is, they speak English less than “very well”. In King County, 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.

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 variety of mobility management programming. In 2019, Hopelink Mobility Management provided services to 233 clients through our public transit orientations, which targets immigrants and refugees with limited English.

In 2019, Hopelink Non-Emergency Medical Transportation program served 17% non-English speaking clients. At Hopelink Community Services, 19% of clients served were limited English. In addition, Hopelink's English For Work program served 260 students in 2019.

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

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

Delays in the provision of Hopelink's services as a result of language barriers would adversely impact its clients. For example, Hopelink's non-emergency medical transportation for Medicaid clients provide much-needed healthcare access for many low-income individuals with Limited English Proficiency.

In addition, Hopelink's English for Work classes help immigrants and refugees improve their English skills to prepare for—and retain—employment in the United States. Classes focus on helping students learn specific job-search skills such as writing a resume and cover letter and preparing for interviews. Hopelink staff also teach skills needed on the job, such as communicating with diverse groups, working in a team and using a computer. Of those who completed the course, 81 percent had significant gains in their English language skills. Of all employed students who completed the course, their average wage when exiting the course was \$19.02 per hour.

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.

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

Hopelink works to employ a workforce that supports the diversity of our clientele. We also use language line and other interpretation and translation services to meet the needs of our clients, as described below.

Telephone Interpretation Services

For Non-Emergency Medical Transportation, Hopelink used language line services for almost 19,000 calls during the last fiscal year (July 2019 to June 2020). At a cost of \$0.98 per minute, we spent more than \$21,000 on these interpretation services.

Bilingual Staffing & Volunteers

Hopelink currently has 13 bilingual staff and many bilingual volunteers who speak a variety of languages including: Russian, Spanish, Hebrew, Cambodian, Cantonese, Japanese, and Farsi.

From July 2019 – June 2020, our Transportation division received 12,251 calls on the dedicated Russian and Spanish interpretation line for our non-emergency medical transportation brokerage, at an average cost per call of \$2.68 and a total cost of about \$32,878. This line is staffed by Hopelink employees who are fluent in Russian and Spanish.

Outreach & Program Materials

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 \$10,000 was spent in translation and interpretation services in FY2019.

V. 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 actively partnering with community-based organizations that serve LEP populations, including resettlement agencies, social service organizations, and immigrant advocacy agencies. Call takers are trained on how 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 both 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 so that they are consistent in their application.

In order 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.

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, Hopelink 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 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).

Hopelink Mobility Management hosts regular mobility coalition meetings across King County, with over 100 unique organizations participating in 2019. 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 engagement, 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 non-discrimination obligations, please contact Hopelink's Title VI Coordinator at (425) 869-6000 or TitleVI@hopelink.org.

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



I am filing a: Title VI Complaint ADA Complaint General Complaint

Section I:

Name:			
Address:			
Telephone:		Email:	
Accessible Format Requirements?	<input type="checkbox"/> Large Print	<input type="checkbox"/> TDD	
	<input type="checkbox"/> Audiotape	<input type="checkbox"/> Other:	

Section II:

Are you filing this complaint on your own behalf?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<i>If yes, skip to Section III</i>		
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?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Section III: TITLE VI ONLY

I believe the discrimination I experienced was based on (check all that apply)
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> 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)



ATTACHMENT C

Hopelink 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 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 lay out procedures to provide 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 of Hopelink'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 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 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: Hopelink serves all of King County, Washington. English is spoken by only 89.5% of King County's residents. Therefore, 10.5%, or over 214,094 people, have limited English

proficiency. In King County, of those persons with limited English proficiency, about 49% speak Asian and Pacific Island languages, 25% speak Spanish, and 17% speak other Indo-European 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. 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 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 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. 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 Hopelink Mobility Management with comments and/or to request additional information. Requests can be made via telephone by contact Hopelink Mobility Management at 425-943-6760 or by contacting our website at www.kcmobility.org.

Hopelink Mobility Management partnered with over 150 unique organizations in 2019. 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 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 Hopelink's 20-member Board as of June 2019.

Racial/Ethnic Breakdown of Hopelink's Board

Response Category	Percentage
Caucasian	75%
Black or African American	5%
American Indian and/or Alaska Native	5%
Asian	5%
Native Hawaiian and Other Pacific Islander	0.0%
Some Other Race	0.0%
Two or More Races	0.0%
Hispanic or Latino	10%
No Answer Provided	0.0%
Total	100%

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.