



TITLE VI PLAN

**For the Federal Transit Administration and Washington
State Department of Transportation**

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CCAP
101 East Market Street
Aberdeen, Washington 98520
(360) 533-5100
www.coastalcap.org

1. Executive Summary

Coastal Community Action Program (Coastal CAP) is committed to providing transportation programs and activities without discrimination on the basis of race, color, or national origin, consistent with Title VI of the Civil Rights Act of 1964 and U.S. Department of Transportation (USDOT) implementing regulations. Coastal CAP will also take reasonable steps to provide meaningful access to its programs, services, information, and important documents for persons who are limited English proficient (LEP).

This Title VI Plan is tailored to Coastal CAP's role as a community-based transportation provider/sub recipient. Coastal CAP's transportation activities include demand-response services serving rural, low-income, disabled, and other special-needs populations, including the Driven to Opportunity program. Publicly available WSDOT grant information identifies Coastal CAP transportation awards serving Grays Harbor and Pacific Counties and describes the service as demand-response transportation for low-income, disabled, and special-needs populations.

Because Coastal CAP's transportation program is primarily demand-response rather than a large fixed-route system, this program emphasizes the FTA Chapter III requirements applicable to recipients/sub recipients: nondiscrimination, public notice, a complaint procedure and complaint form, complaint/investigation tracking, meaningful language access, inclusive public participation, staff training, monitoring of contractors/partners, recordkeeping, and periodic reporting/review.

This document is designed to be used with the applicable WSDOT grant agreement, WSDOT Title VI tools, Coastal CAP's Language Assistance Plan, ADA policies, procurement/contract provisions, and program-specific operating policies. Where a grant agreement or current FTA/WSDOT directive is more specific, the more specific requirement will control.

2. Title VI Policy Statement

It is the policy of Coastal Community Action Program that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination under any program or activity receiving federal financial assistance.

Coastal CAP will administer its transportation programs and activities in a manner that provides meaningful and equitable access to services and information. Coastal CAP will not intentionally discriminate and will take reasonable steps to identify and address practices that result in discriminatory treatment or deny meaningful access.

This policy applies institution-wide to transportation programs and activities supported with federal financial assistance, including activities carried out by employees, volunteers, contractors, consultants, partner organizations, and other agents acting on Coastal CAP's behalf.

3. Authority and Applicable Requirements

- Title VI of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000d–2000d-7.
- 49 CFR Part 21, Nondiscrimination in Federally-Assisted Programs of the Department of Transportation—Effectuation of Title VI.
- FTA Circular 4702.1B, Title VI Requirements and Guidelines for Federal Transit Administration Recipients.
- USDOT Title VI and LEP guidance applicable to recipients of federal financial assistance.

- Executive Order 13166 and applicable federal LEP guidance, to the extent currently applicable to the federally assisted program.
- Applicable WSDOT Title VI/LEP policies, grant agreements, sub recipient requirements, complaint procedures, monitoring requirements, and reporting forms.
- Applicable Washington State nondiscrimination, public records, accessibility, and civil-rights requirements that apply to Coastal CAP's transportation activities.

4. Organization, Responsibility, and Accountability

Coastal CAP's governing body or authorized decision-making body is responsible for adopting this Title VI Plan and ensuring that adequate resources are available to implement it. The Executive Director is responsible for agency-wide compliance, while the designated Title VI contact is responsible for day-to-day implementation and documentation.

Role	Responsibility
Governing Board / Authorized Body	Adopts the Title VI Plan; receives periodic compliance reports; supports corrective actions and resources.
Executive Director	Provides executive oversight; ensures Title VI is integrated into agency policies, contracts, training, public outreach, and transportation decisions.
Transportation Program Management	Implements nondiscriminatory eligibility, scheduling, dispatch, customer service, service-denial, vehicle assignment, and communication practices; identifies service-access concerns.
Human Resources / Training	Supports nondiscrimination training and maintains training records.
Procurement / Contract Management	Includes applicable Title VI assurances and nondiscrimination requirements in covered contracts and agreements; monitors compliance where required.
All Employees, Drivers, Volunteers, and Agents	Treat riders and applicants without discrimination; provide requested language assistance consistent with the Language Assistance Plan; promptly report complaints or concerns.

5. Notice to the Public

Coastal CAP will notify passengers, applicants, employees involved in transportation activities, and other interested persons of their Title VI rights and Coastal CAP's obligations. The notice will be posted in public areas of transportation offices, on the Coastal CAP website, and in other locations or media appropriate to the transportation program, including vehicles or rider materials when practical.

The public notice will state that Coastal CAP operates transportation programs without regard to race, color, or national origin; identify how to request additional information; and explain how to file a Title VI complaint. Notices and complaint information will be translated or otherwise made accessible when required by Coastal CAP's Language Assistance Plan and applicable FTA/WSDOT requirements.

5.1 Public Notice – Standard Text

NOTICE OF TITLE VI RIGHTS

Coastal Community Action Program operates its transportation programs and activities without regard to race, color, or national origin. If you believe Coastal CAP has discriminated against you on the basis of race, color, or national origin, you may file a Title VI complaint. To request additional information about Coastal CAP's Title VI obligations or to obtain a complaint form, contact Coastal Community Action Program at (360)-533-5100, email coastalcap.org. You may also submit a written complaint using Coastal CAP's Title VI complaint procedure.

6. Title VI Complaint Procedure

Any person who believes that Coastal CAP or one of its employees, contractors, volunteers, or agents has discriminated against them on the basis of race, color, or national origin in connection with a federally assisted transportation program may file a Title VI complaint.

1. Complaints should ordinarily be filed within 180 days of the alleged discrimination, consistent with applicable USDOT/FTA requirements. Coastal CAP will forward or refer complaints when a different federal or state agency has jurisdiction or when required by WSDOT or the applicable grant agreement.
2. Complaints may be submitted in writing, by email, by mail, or through another accessible method. If a complaint is made orally, Coastal CAP will assist the complainant in documenting the allegation to the extent necessary and appropriate.
3. The complaint should identify the complainant's contact information; the basis of the complaint; the person(s) or organization(s) alleged to have discriminated; a description of the alleged discriminatory conduct; the date(s) of the alleged conduct; and any supporting information available.
4. Coastal CAP will acknowledge receipt, review jurisdiction and completeness, conduct or coordinate an appropriate investigation, document findings, and communicate the disposition consistent with applicable confidentiality, personnel, and legal requirements.
5. A complainant may file a complaint directly with the applicable federal funding agency. Filing with Coastal CAP does not eliminate any independent right to file with WSDOT, FTA, or another agency with jurisdiction.
6. Coastal CAP will not retaliate against a person because the person filed a Title VI complaint, participated in an investigation, or otherwise exercised rights protected by Title VI.

6.1 Complaint Contact

Coastal Community Action Program
Email – coastalcap.org
Phone – (360)-533-5100

6.2 Complaint Tracking

Coastal CAP will maintain a Title VI complaint log identifying, at minimum, the date received, complainant, basis, program/service involved, summary of allegation, status, actions taken, disposition, and date closed. The log will be maintained securely and will contain only the information needed for compliance and reporting. Complaints and investigation records will be retained for the period required by the applicable grant agreement, WSDOT/FTA requirements, and Coastal CAP's records-retention schedule.

7. Limited English Proficiency (LEP) and Language Assistance

Coastal CAP recognizes that persons who are limited English proficient may require language assistance to obtain meaningful access to transportation programs, services, information, and vital documents. Coastal CAP will take reasonable steps to provide meaningful access, consistent with applicable federal LEP guidance and the agency's Language Assistance Plan.

7.1 Four-Factor Analysis

Coastal CAP will periodically consider the following four factors when evaluating language-assistance needs:

- The number or proportion of LEP persons eligible to be served or likely to be encountered by the program.
- The frequency with which LEP individuals come into contact with the program.
- The nature and importance of the program, service, or activity to people's lives.
- The resources available to Coastal CAP and the overall costs of providing language assistance.

7.2 Language Assistance Measures

- Identify languages likely to be encountered in the service area using available demographic data, customer information, staff observations, and community partner input.
- Provide interpreter or translation assistance when necessary for meaningful access, using qualified resources when practicable.
- Translate vital documents into languages meeting applicable thresholds or otherwise provide effective alternative access consistent with federal guidance.
- Use plain language and accessible communication methods for transportation eligibility, scheduling, rider rights, service changes, complaints, and other important information.
- Train transportation staff and drivers on how to recognize an LEP need and how to obtain language assistance.
- Document significant language-access requests, unmet needs, and corrective actions.

Coastal CAP will maintain a separate Language Assistance Plan (LAP) or incorporate the required content into this Title VI Plan, as directed by WSDOT or the applicable funding agreement. The LAP will be reviewed at least every three years and sooner when service area, demographics, program scope, or applicable requirements materially change.

8. Public Participation and Community Engagement

Coastal CAP will provide meaningful opportunities for public participation in transportation planning and significant program decisions. Engagement methods will be appropriate to the nature of Coastal CAP's demand-response services and the rural communities served.

- Provide reasonable advance notice of public meetings, surveys, listening sessions, proposed significant service changes, and other opportunities for input.
- Use multiple communication methods, such as website notices, printed materials, telephone outreach, community partners, rider communications, and public meetings.
- Select meeting times and locations that are reasonably accessible to affected riders and communities.
- Provide language assistance and accessible formats when needed to allow meaningful participation.

- Seek input from riders, prospective riders, minority communities, LEP communities, disability and senior-serving organizations, low-income residents, employers, workforce organizations, and other affected stakeholders.
- Document comments received and how they were considered in significant transportation decisions.

Because Coastal CAP's transportation services are primarily demand-response, public participation will focus on service eligibility, scheduling/access policies, service area changes, fare or rider-charge policies if applicable, major reductions or expansions, and other decisions that may materially affect access to transportation.

9. Nondiscrimination in Service Delivery

Coastal CAP will administer transportation services in a manner that does not discriminate on the basis of race, color, or national origin. Staff will apply eligibility, scheduling, trip prioritization, cancellation, denial, wait-list, customer-service, and complaint procedures consistently and according to written program rules.

- Transportation eligibility requirements will be based on applicable program rules and funding requirements, not race, color, or national origin.
- Trip scheduling and dispatch practices will not intentionally provide materially different service based on race, color, or national origin.
- Service denials, suspensions, or terminations will be based on documented program or safety criteria and will be communicated consistently.
- Rider information and service-change notices will be distributed using communication methods that reasonably reach affected populations, including LEP riders when applicable.
- Coastal CAP will monitor customer complaints and service data for patterns that may indicate barriers or discriminatory treatment and will take corrective action when warranted.

10. Contractors, Sub recipients, Partners, and Third Parties

Coastal CAP will include applicable federal and state civil-rights and Title VI requirements in contracts, subcontracts, purchase orders, memoranda of understanding, and other agreements supporting federally assisted transportation activities when required by the applicable funding source.

Coastal CAP will use appropriate assurances and contract language supplied by WSDOT, FTA, or the applicable federal funding agency. Where Coastal CAP relies on a third party to provide transportation or related services, Coastal CAP will maintain reasonable oversight to confirm that required nondiscrimination provisions are implemented.

11. Training and Internal Communication

Transportation employees, drivers, dispatchers, supervisors, managers, and other personnel whose duties materially affect riders or transportation decisions will receive Title VI and nondiscrimination training appropriate to their roles.

- Title VI rights and prohibited discrimination.
- How to respond to and document complaints.
- How to obtain language assistance for LEP riders
- Customer-service and communication expectations.
- Consistent application of eligibility, scheduling, service-denial, and other program rules.

- Non-retaliation and escalation requirements.
- Recordkeeping and reporting responsibilities.

Training will be provided at onboarding and periodically thereafter, with refresher training when policies or requirements materially change. Coastal CAP will maintain records showing training date, topic, trainer, and attendees.

12. Monitoring, Data, and Compliance Review

Coastal CAP will maintain sufficient information to demonstrate implementation of this Title VI Plan and to respond to WSDOT, FTA, or other oversight reviews.

- Title VI complaints, investigations, referrals, and dispositions.
- Public notices and outreach materials.
- Language-assistance requests and significant translation/interpreter activity.
- Public participation activities and comments received.
- Training records.
- Relevant transportation service data, including service denials/cancellations and other information that can reasonably be reviewed for nondiscrimination concerns.
- Contracts and agreements containing applicable Title VI provisions.
- Corrective actions and follow-up documentation.

At least annually, the designated Title VI contact will conduct or coordinate an internal review of implementation. The review will identify accomplishments, unresolved issues, training needs, complaint trends, language-access needs, public-engagement activities, and goals for the next review period.

13. Service and Fare/Charge Equity Review

If Coastal CAP proposes a fare, rider charge, eligibility rule, service-area change, major service reduction, or other material change that could affect access to transportation, the agency will evaluate the proposal for potential discriminatory effects and document the basis for the decision. The depth of analysis will be proportional to the size and nature of the change and will follow applicable WSDOT/FTA requirements.

For demand-response services, the review may include comparison of affected rider populations, trip denials or unmet requests, geographic coverage, eligibility rules, communication/language access, and other factors relevant to whether similarly situated riders are treated consistently.

14. Recordkeeping

Coastal CAP will maintain Title VI records in accordance with applicable federal and state requirements, grant agreements, and its records-retention schedule. Records will be sufficiently organized to demonstrate implementation and permit oversight review.

- Current and prior Title VI Plans and approvals.
- Title VI notices and public communications.
- Complaint files and complaint logs.
- Language-access assessments, plans, requests, and materials.
- Public participation notices, sign-in sheets or participation records, comments, and responses.
- Training materials and attendance records.

- Applicable contracts and Title VI assurances.
- Annual accomplishments and goals reports and corrective-action documentation.

Appendix A – Title VI Notice to Public

Appendix B – Title VI Complaint Form

Use this form for allegations of discrimination in Coastal CAP's federally assisted transportation programs based on race, color, or national origin.

Complainant name: _____

Mailing address: _____

City/State/ZIP: _____

Phone: _____ Email: _____

Best time/method to contact you: _____

Basis of complaint: ☐ Race ☐ Color ☐ National origin / LEP

Date(s) of alleged discrimination: _____

Program/service involved: _____

Person(s)/organization(s) involved: _____

Describe what happened, including why you believe the treatment was discriminatory:

What remedy or action are you requesting?

Names/contact information of witnesses or other supporting persons:

Have you filed this complaint with another agency? ☐ Yes ☐ No

If yes, agency and date: _____

Signature: _____ Date: _____

Appendix C – Complaint Investigation Workflow

7. Receive complaint and date-stamp/log it.
8. Acknowledge receipt and provide the complainant with the process and contact information.
9. Determine whether the allegation falls within Title VI jurisdiction and whether another agency must be notified or involved.
10. Collect relevant records, interview appropriate persons, and preserve evidence.
11. Evaluate the facts under Title VI and applicable Coastal CAP, WSDOT, and FTA requirements.
12. Document findings and corrective actions, if any.
13. Issue a written disposition consistent with applicable requirements and confidentiality limits.
14. Forward or refer the matter to WSDOT, FTA, FHWA, USDOT, or another appropriate agency when required.
15. Update the complaint log and track corrective actions to completion.

Appendix D – Title VI Complaint Log

Case #	Date Received	Basis	Program/Service	Allegation Summary	Status	Disposition	Date Closed
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Appendix E – LEP Four-Factor Assessment Worksheet

Factor 1 – Number or proportion

Identify languages spoken by persons eligible to be served or likely to be encountered; note available Census/ACS or other demographic information.

Factor 2 – Frequency

Document frequency of contacts with LEP persons, interpreter requests, translated-material requests, or other language-access events.

Factor 3 – Importance

Identify transportation services and information for which denial or delay could have serious consequences, including access to employment, medical care, education, benefits, or other essential activities.

Factor 4 – Resources and costs

Document available staff, vendor/interpreter resources, translation costs, and practical alternatives.

Appendix F – References and Official Resources

- **FTA – Title VI Requirements and Guidelines for FTA Recipients (Circular 4702.1B):** <https://www.transit.dot.gov/regulations-and-guidance/fta-circulars/title-vi-requirements-and-guidelines-federal-transit>
- **FTA – Title VI Guidance:** <https://www.transit.dot.gov/regulations-and-guidance/civil-rights-ada/title-vi-guidance>
- **FTA – Public Involvement in Transit Decision-Making:** <https://www.transit.dot.gov/Public-Involvement>
- **FTA – Title VI of the Civil Rights Act of 1964:** <https://www.transit.dot.gov/title6>
- **WSDOT – Title VI / Limited English Proficiency:** <https://wsdot.wa.gov/about/title-vi-limited-english-proficiency>
- **WSDOT – Title VI Complaint:** <https://wsdot.wa.gov/about/title-vi-limited-english-proficiency/title-vi-complaint-form>
- **WSDOT – Public Transportation Grant Program Resources:** <https://wsdot.wa.gov/business-wsdot/grants/public-transportation-grants>
- **Coastal CAP:** <https://www.coastalcap.org/>